



December 10, 2025

Daniel Kushner
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NOTICE OF NONPERFORMANCE

Mr. Daniel Kushner:

Pursuant to Government Code section 15472, et seq, the Office of Energy Infrastructure Safety (Energy Safety) has conducted an inspection of work completed by Pacific Gas and Electric (PG&E) in accordance with its 2025 Wildfire Mitigation Plan (WMP) and determined the existence of nonperformance requiring correction. Energy Safety therefore issues PG&E a Notice of Non-Performance (NON).

On November 6, 2025, Energy Safety conducted an inspection of PG&E's WMP initiatives in the vicinity of Meadow Vista, California. The inspection report is enclosed herewith. Energy Safety found the following deficiency:

Deficiency 1. Energy Safety observed that in implementing 2025 WMP initiative 8.2.2.2.3 Vegetation Management for Operational Mitigations (VMOM), PG&E failed to adhere to its protocol of wood and slash management near Pole ID 121477130, Vegetation Management ID RX-04390156, RX-04390169, and RX-04390160 at coordinates 39.01999336146545, -121.01424685533279. Energy Safety considers this nonperformance to be in the Moderate risk category.

Energy Safety provided the initial findings and supporting information regarding this deficiency to PG&E on November 12, 2025. Based on the information provided to PG&E before Energy Safety issued this NON, PG&E remediated the deficiency on November 20, 2025 and provided photographs to Energy Safety documenting the remediation. Energy Safety reviewed the photographs and determined that PG&E adequately completed the work. As a result, Energy Safety considers the NON closed and no further action is required by PG&E.

If you have any questions regarding the enclosed inspection report, please contact me or Elizabeth McAlpine at Elizabeth.McAlpine@energysafety.ca.gov.

Sincerely,

A handwritten signature in black ink that reads "Sheryl Bilbrey".

Sheryl Bilbrey
Program Manager | Environmental Science Division

Office of Energy Infrastructure Safety

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INSPECTION REPORT

Overview

The Office of Energy Infrastructure Safety (Energy Safety) conducts field inspections to verify the work performed by an electrical corporation as reported in an approved Wildfire Mitigation Plan (WMP), and to assess general conditions of electrical infrastructure that may adversely impact an electrical corporation's wildfire risk. A Notice of Non-Performance (NON) is issued for any instances of nonperformance identified during an inspection related to an electrical corporation's execution of its WMP initiatives.

Energy Safety has designated this finding of deficiency as "Moderate" risk. PG&E has since remediated the deficiency. This NON is considered closed, and no further action is needed of PG&E.



Inspection Summary

Energy Safety found a “Moderate” Adherence to Protocol deficiency near VMP IDs RX-04390156, RX-04390169, and RX-04390160 near pole 121477130 in HFTD Tier 2. PG&E did not perform its Wood and Slash Management (WMP Initiative 8.2.3.2) program as required in the WMP, instead slash was left piled on site.

The inspection location and WMP initiative summary are included in Table 1.

Table 1: Inspection Location and Initiative Summary

Electrical Corporation:	PG&E
Report Number:	ESD_PGE_GCA_20251106_1429
Inspector:	Gary Candelas
WMP Year Inspected:	2025
Quarterly Data Report (QDR) Referenced:	Quarter 2
Inspection Selection:	Energy Safety inspected the locations based on PG&E's Q2 QDR.
Relevant WMP Initiative(s):	8.2.3.2 Wood and Slash Management
Date of inspection:	November 6, 2025
City and/or County of Inspection:	Meadow Vista, Placer County

Inspection Findings

Deficiency 1

Relevant Requirement:

PG&E's WMP initiative 8.2.3.2 Wood and Slash Management states that, "Utility work on vegetation creates debris and wood products which, if left unmanaged, can become fuel for wildfire. PG&E is required to reduce or adjust live fuels as they are generated from programs developed to comply with PRC [Public Resources Code] 4293, General Order 95 Rule 35 and Pub. Util. Code [Public Utility Code] 8386."¹

PG&E's WMP initiative continues by stating, "PG&E's VM [vegetation management] Programs define debris as material less than 4 inches in diameter and large wood as material greater than 4 inches in diameter.... Debris less than 4 inches in diameter that is generated during pruning activities are chipped or lopped and scattered on the property in accordance with applicable regulations...."²

PG&E lists the following governing standard for its slash management program, "Best Management Practices (BMP) for Vegetation Management Activities (TD-7102P-01-JA01)."³ PG&E's protocol TD-7102P-01-JA01 states, "Woody debris created by chipping, lop and scatter, or brush mowing operations must be left at an average depth of less than 18 inches from the ground surface unless otherwise specified in an easement or landowner agreement."⁴

Findings:

Energy Safety considers this deficiency as a "Moderate" because the slash pile is over 18-inches in height, creating a potential fuel source for wildfire.

At VMP IDs RX-04390156, RX-04390169, and RX-04390160 near pole ID 121477130, PG&E reported it completed work under its VMOM program. PG&E's Q2 data reports that its crew removed three oak trees on May 18, 2025. Energy Safety's inspector observed slash, wood chips, and woody debris from the oak trees. Additionally, the inspector observed a pile of slash debris was higher than 18 inches. The inspector's observation is documented in photos 1 and 2, which are exhibits to this report.

¹ PG&E's 2023-2025 WMP (Rev. #4.1, Jun. 7, 2024), p. 277

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>), accessed Dec. 1, 2025)

² PG&E's 2023-2025 WMP (Rev. #4.1, Jun. 7, 2024), p. 680

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>), accessed Dec. 1, 2025).

³ PG&E's 2023-2025 WMP (Rev. #4.1, Jun. 7, 2024), p. 680

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>), accessed Dec. 1, 2025).

⁴ Pacific Gas and Electric Company. (n.d.). General best management practices for all VM (TD-7102P-01-JA01) (Rev. 1, Jan. 6, 2022), p. 12 (<https://www.pge.com/assets/pge/docs/outages-and-safety/outage-preparedness-and-support/td-7102p-01-ja01-general-best-management-practices-for-all-vm.pdf>), accessed Dec. 1, 2025).

Energy Safety sent PG&E Data Request (DR) OIES-E-INP_2025-PG&E-006 on November 12, 2025, inquiring about the vegetation management activities at the site. PG&E's response to the data request confirmed that the slash, chips and woody debris was associated with VMP IDs RX-04390156, RX-04390169, and RX-04390160.

Since Energy Safety's inspection, PG&E conducted a field visit on November 20, 2025, and completed the clean-up and disposal of wood and slash at the location in this report. Therefore, Energy Safety considers NON ESD_PGE_GCA_20251106_1429 closed. No further action from PG&E is required in response to this NON.

Exhibits

Exhibit A: Photo Log

Structure ID: 121477130

Deficiency 1



Photo 1: Photo of pile of slash and wood debris

Photo 2: Photo of slash and wood debris