



December 22, 2025

Daniel Kushner
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NOTICE OF NON-PERFORMANCE

Mr. 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 Company (PG&E) in accordance with its 2024 Wildfire Mitigation Plan (WMP) and determined the existence of non-performance requiring correction. Energy Safety therefore issues PG&E a Notice of Non-Performance (NON), identifying non-performance with its approved WMP.

On August 27, 2025, Energy Safety conducted an inspection of PG&E's WMP initiatives in the vicinity of the city of Sonoma, California. The inspection report is enclosed herewith. Energy Safety found the following deficiencies:

Deficiency 1. Energy Safety observed that in implementing 2024 WMP initiative 8.1.2.5.1 - Traditional Overhead Hardening - Transmission Conductor, PG&E failed to install splice shunts on Pole ID 000/004, Grid Hardening ID 74057097-1 at coordinates 38.275761, -122.460516. Energy Safety considers this non-performance to be in the Minor risk category. PG&E must complete a corrective action for this deficiency by 12 months from date of this notice.¹

Within 30 days from the issuance date of this NON, the electrical corporation must provide a response advising Energy Safety of corrective actions taken or planned to remedy the identified deficiency or deficiencies.

This response shall be filed in the Energy Safety e-Filing system under the 2024 NON Docket² and the associated file name(s) must begin with the NON identification number.

¹ Gov. Code section 15475.2(a)(2)

² <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2024%20NON>

Prior to its response, the electrical corporation may request an informal conference with Energy Safety for the purpose of disputing any issues raised in this NON no later than five (5) business days before the response deadline.³ Requests for informal conference with Energy Safety must be e-mailed to compliance@energysafety.ca.gov, with a copy sent to all Energy Safety staff identified in the NON.

Sincerely,



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³ Energy Safety Compliance Guidelines, p. 4



INSPECTION REPORT

Overview

Inspection Categories

The Office of Energy Infrastructure Safety (Energy Safety) conducts inspections to verify the work performed by an electrical corporation as reported in an approved Wildfire Mitigation Plan (WMP) or subsequent filing, 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 deficiencies discovered during an inspection related to an electrical corporation's performance of its WMP.

Correction Timelines

Deficiencies must be corrected in a timely manner. Energy Safety may prescribe a timeframe for resolution of a deficiency.⁴ If Energy Safety assigns a risk category to a deficiency, an electrical corporation must correct the deficiency as required per the timelines provided in Table 1.⁵

Table 1. Risk Category and Correction Timelines

| Risk Category | Deficiency correction timeline |
|---------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Severe | <ul style="list-style-type: none">• Immediate resolution |
| Moderate | <ul style="list-style-type: none">• 2 months (in High Fire Threat District (HFTD) Tier 3)• 6 months (in HFTD Tier 2)• 6 months (if relevant to worker safety; not in HFTD Tiers 2 or 3) |
| Minor | <ul style="list-style-type: none">• 12 months or resolution scheduled in WMP update |

⁴ Gov. Code section 15475.2(a)(2)

⁵ Energy Safety Compliance Guidelines, p. 3



Inspection Summary

Table 2 provides a summary of the selection of the WMP inspection location and initiative. Table 3 provides a summary of the deficiency or deficiencies found during the inspection. Details regarding the inspection that identified the deficiency or deficiencies are provided in the Inspections Details Section below.

Table 2: Inspection Location and Initiative Summary

| | |
|-----------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Electrical Corporation: | Pacific Gas and Electric Company |
| Report Number: | CAD_PGE_CYA_20250827_1038 |
| Inspector: | Cecilia Yaniz |
| WMP Year Inspected: | 2024 |
| Quarterly Data Report (QDR) Referenced: | Quarter Q4 (Q4) |
| Inspection Selection: | Energy Safety viewed the contents of the Q4 QDR and performed an analysis that resulted in the selection of the WMP initiatives and locations referenced in this report. |
| Relevant WMP Initiative(s): | 8.1.2.5.1 - Traditional Overhead Hardening - Transmission Conductor |
| Date of inspection: | August 27, 2025 |
| City and/or County of Inspection: | Sonoma, Sonoma County |
| Inspection Purpose: | Assess the accuracy of Pacific Gas and Electric Company's QDR data, completeness of its work, compliance with WMP requirements, and compliance with its protocols. |

Table 3: WMP Inspection Deficiencies

| Deficiency # | Structure ID | Grid Hardening ID | Lat/Long | HFTD | Initiative Number | Severity | Deficiency Description |
|--------------|--------------|-------------------|------------------------|----------|---------------------------------------------------------------------|----------|---------------------------------------------------------------|
| Deficiency 1 | 000/004 | 74057097-1 | 38.275761, -122.460516 | Non-HFTD | 8.1.2.5.1 - Traditional Overhead Hardening - Transmission Conductor | Minor | Failed to complete work on transmission shunt splice install. |

Inspection Details

Deficiency 1

Relevant Requirement:

PG&E's WMP states the following regarding initiative number 8.1.2.5.1 - Traditional Overhead Hardening - Transmission Conductor on shunt splices:

1. "A conductor splice is a point of failure within a conductor span, due to factors such as corrosion, moisture intrusion, vibration, and workmanship variability. Certain types of splices, such as a twist splice, can have higher risk of failure compared to other splice types. A program has been initiated to install a shunt splice on top of the existing splice. This installation eliminates the splice as a single point of failure, as a failure of the original splice would not result in down conductor. Lines prioritized for this program are based on higher risk splice and wildfire consequence."⁶

Findings:

On Pole ID 000/004, Grid Hardening ID 74057097-1 at Mile 38.7 State Rte 12 E, Sonoma, CA, 95476, USA, 38.275761, -122.460516, the inspector observed no shunt splice on spans connecting to Pole 000/004. A splice was present on the eastern span of Pole 000/004 and was not shunted. The inspector's observation is documented in Deficiency 1 photographs, which are attachments to this report. Photo numbers Item1IA1Img1, Item1IA1Img2, and Item1IA1Img3 depict incomplete installation of shunt splices on transmission spans attached to Pole 000/004. In the 2024 Q4 Quarterly Data Report submission, PG&E reported that work on WMP initiative 8.1.2.5.1 - Traditional Overhead Hardening - Transmission Conductor were completed at this location, with the Description of Work field reading "Shunt Splice Installation."

Energy Safety concludes that there is a deficiency because of these facts:

1. One existing splice was present on the spans connected to Pole 000/004. The splice is present on the eastern side between Pole 000/004 and 000/005.
2. No shunt splice was observed on top of the existing splice.
3. No shunt splice was observed on spans connected to either side of Pole 000/004.




⁶ Pacific Gas & Electric Company, "PG&E 2023-25 Wildfire Mitigation Plan R8" February 13, 2025, p. 442. [Online]. Available: <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57976&shareable=true>

Exhibits

Exhibit A: Photo Log

Structure ID: 000/004

Deficiency 1

| | |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  A photograph showing a wooden utility pole at a street intersection. The pole is dark brown and has several cross-arms with wires. In the background, there are traffic lights, a crosswalk, and some trees under a clear blue sky. |  A close-up photograph of the wooden pole. The structure ID "000/004" is painted in yellow on the pole. There is also some white tape or markings on the pole. |
| <p>Item1GImg1: Overall Structure</p> | <p>Item1GImg2: Structure ID</p> |
|  A photograph showing the span of wires between Pole 000/004 and Pole 000/003. The wires are sagging between the two poles. The sky is clear blue. |  A photograph showing a portion of the span between Pole 000/004 and Pole 000/005. The wires are sagging between the two poles. The sky is clear blue. |
| <p>Item1IA1Img1: Span between Pole 000/004 and 000/003.</p> | <p>Item1IA1Img2: Portion of span between Pole 000/004 and 000/005.</p> |



Item1IA1mg3: A splice with no shunt on span between 000/004 and 000/005.