



December 23, 2025

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NOTICE OF NON-PERFORMANCE

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 non-performance requiring correction. Energy Safety therefore issues PG&E a Notice of Non-Performance (NON).

On April 7, 2025, Energy Safety conducted an inspection of PG&E's WMP initiatives in the vicinity of Santa Cruz, California in High Fire Threat District (HFTD) Tier 3. The initial finding of a declining tree was reported to PG&E via E-mail on April 29, 2025 as a Wildfire Safety Concern (WSC). In response, PG&E prescribed full removal on May 5, 2025 under RX-04749736. On December 12, 2025, Energy Safety conducted a second inspection and confirmed that PG&E had not removed the tree. The inspection report is enclosed herewith. Energy Safety found the following deficiency:

Deficiency 1. Energy Safety observed that in implementing 2025 WMP initiative 8.2.2.2.2 Distribution Second Patrol (VM-17) near coordinates 37.043816652372, -122.108385937438, PG&E failed to adhere to its protocol of removing dead, declining or dying trees within 180 days of identification. Energy Safety considers this non-performance to be in the Moderate risk category. PG&E must complete a corrective action for this non-performance by two months from the date of this notice.¹

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

This response shall be filed in the Energy Safety e-Filing system under the 2025 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=2025%20NON>

Prior to its response, PG&E 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 environmentalscience@energysafety.ca.gov, with a copy sent to Ricardo Garcia, Ricardo.Garcia@energysafety.ca.gov, and Elizabeth McAlpine, Elizabeth.McAlpine@energysafety.ca.gov.

Sincerely,



Sheryl Bilbrey
Program Manager | Environmental Science Division
Office of Energy Infrastructure Safety
Sheryl.Bilbrey@energysafety.ca.gov

Cc:

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³ Energy Safety Compliance Guidelines, p. 4



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 non-performance 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 must correct the deficiency pursuant to the timeline provided in Table 1.⁴

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 Energy Safety Compliance Guidelines, p. 3



Inspection Summary

Energy Safety found a “Moderate” Adherence to Protocol deficiency near support structure ID 101681244 in HFTD Tier 3. PG&E did not a declining tree identified under the 8.2.2.2.2 Distribution Second Patrol (VM-17) program in the timeline required in the WMP, instead the tree has remained unmitigated for over 180 days.

The inspection location and WMP initiative summary are included in Table 2.

Table 2: Inspection Location and Initiative Summary

| | |
|---|--|
| Electrical Corporation: | PG&E |
| Report Number: | NON_ESD_PGE_RGA_20250407_1543 |
| Inspector: | Ricardo Garcia |
| WMP Year Inspected: | 2025 |
| Quarterly Data Report (QDR) Referenced: | NA |
| Inspection Selection: | Energy Safety inspected the locations based on PG&E's Q4 2024 QDR and PG&E's response to Energy Safety's issued WSC. |
| Relevant WMP Initiative(s): | 8.2.2.2.2 Distribution Second Patrol (VM-17) |
| Dates of inspection: | April 7, 2025, and December 12, 2025 |
| City and/or County of Inspection: | Santa Cruz, California |

Inspection Findings

Deficiency 1

Relevant Requirement:

PG&E's WMP states the following regarding initiative number 8.2.2.2.2 Distribution Second Patrol (VM-17): "The objective of the Second Patrol is to maintain radial clearance between vegetation and conductors by identifying trees that will encroach within the MDRs and by identifying dead, dying, and declining trees that may fail and strike conductors. PG&E has implemented a plan to complete the identified dead/dying tree work within 180 days for HFTD areas and within 365 days for non-HFTD areas."⁵

Findings:

Energy Safety considers this deficiency as a "Moderate" because PG&E has not removed the declining tree located within striking distance of conductors within PG&E's committed 180 day removal timeframe, resulting in continued wildfire risk.

On April 7, 2025, Energy Safety conducted an inspection of PG&E's WMP initiatives in the vicinity of Santa Cruz, California. During the inspection, Energy Safety identified a declining pine tree located within striking distance of the conductors near support structure ID 101681244 and coordinates 37.043816652372, -122.108385937438 along Empire Grade Road. This initial finding was reported to PG&E via E-mail on April 29, 2025 as a Wildfire Safety Concern (WSC). In response, PG&E prescribed full removal of the tree on May 5, 2025 under RX-04749736, with a required removal deadline of October 2, 2025, in accordance with the 180-day removal timeframe specified in PG&E's WMP initiative number 8.2.2.2.2. On December 12, 2025, Energy Safety conducted a follow-up inspection and confirmed that the tree had not been removed. As of the December 12, 2025 inspection, 221 days had elapsed since the prescription date of May 5, 2025, exceeding the removal deadline. The inspector's observation is documented in photos 1 and 2, which are exhibits to this report.

⁵ PG&E "2023-2025 Base WMP", published February 13, 2025. p. 726

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57976&shareable=true> accessed December 22, 2025).

Exhibits

Exhibit A: Photo Log

Structure ID: 101681244

Deficiency 1



Photo 1: Photo of declining pine tree taken during the inspection on December 12, 2025.

Photo 2: Photo of conks along the trunk of declining pine taken during the inspection on April 7, 2025.