

January 21, 2026

Patrick Doherty  
Program Manager | Compliance Assurance Division  
Office of Energy Infrastructure Safety  
715 P Street, 20<sup>th</sup> Floor  
Sacramento, CA 95814

RE: Energy Safety NON ID: CAD\_PGE\_CYA\_20250827\_1038  
Notice of Nonperformance: Government Code §§ 15475.1(a) and 15475.2(a)(2), and the California Code of Regulations, Title 14, Division 17 § 29302(b)(2)

Dear Mr. Doherty:

This letter is in response to the above referenced Notice of Nonperformance (NON) dated December 22, 2025, regarding the Office of Energy Infrastructure Safety (Energy Safety) inspection of Pacific Gas and Electric Company's (PG&E) 2024 Wildfire Mitigation Plan (WMP) initiatives completed per the locations submitted in its Fourth Quarter (Q4) Quarterly Data Report (QDR).

Energy Safety based its compliance assessment on the following statute and code sections:

**California Government Code Section 15475.1, states:**

- (a) *The office may determine that a regulated entity is not in compliance with any matter under the authority of the office. If necessary, the office may undertake an investigation into whether the regulated entity is noncompliant with its duties and responsibilities or has otherwise committed violations of any laws, regulations, or guidelines within the authority of the office.*
- (b) *The office's primary objective is to ensure that regulated entities are reducing wildfire risk and complying with energy infrastructure safety measures as required by law.*

**California Government Code Section 15475.2, states:**

- (a) *The office may issue a notice of defect or violation to direct the regulated entity to correct any defect or noncompliance with the approved wildfire mitigation plan or failure to comply with any laws, regulations, or guidelines within the authority of the office.*

**California Code of Regulations, Title 14, Section 29302(b)(2), "Investigations, Notices of Defect and Violation, and Referral to the Commission" states in part:**

*"The Director may designate a compliance officer to consider the findings of any investigation. The compliance officer may issue any of the following:*

...

*(2) Notice of violation, identifying noncompliance with an approved Wildfire Mitigation Plan or any law, regulation, or guideline within the authority of the Office.”*

The NON was identified from an August 27, 2025, inspection by Energy Safety in the vicinity of the city of Sonoma, CA, a Non-High Fire Threat District (HFTD) of PG&E’s Q4 SQDR report for WMP Initiative 8.1.2.5.1 – Traditional Overhead Hardening (Transmission Conductor), Utility Initiative GH-06:

*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.*

## **Response**

PG&E agrees with Energy Safety’s observation of a missing installed splice shunt between pole ID 000/004 and 000/005, as stated in the 2024 Q4 Quarterly Data Report (QDR) for WMP Initiative 8.1.2.5.1 – Traditional Overhead Hardening (GH-06). Although, PG&E’s 2024 Q4 QDR geospatial dataset included the Grid Hardening ID 74057097-1 at coordinates 38.275761, -122.460516, a splice shunt installation did not occur at the cited location.

PG&E originally provided the dataset for GH ID 74057097-1, assembled in January 2025 and submitted to Energy Safety in February 2025. These dates precede PG&E’s incorporation of additional quality control (QC) reporting filters, providing validation that installed splice data was solely included, as a result of a Notice of Violation (NOV) received from Energy Safety back in August 2025. Previously, PG&E provided data that labeled installed support structure as “Construction Complete”, inadvertently including locations with zero shunt installations. PG&E’s future reporting will align with its QC validation of QDR reporting errors in its GH-06 initiative.

Additionally, with Energy Safety’s change in its reporting methodology for 2026 requiring individual splice level data, PG&E is developing a new process for its splice installation within a system of record (e.g. ETGIS, SAP, Construct App) in lieu of manual transcriptions of As-Built drawings. The newly developed process will result in more reliable data. PG&E would also like to make Energy Safety aware of the delay in providing data at the individual splice level, requiring PG&E’s system of record to be updated after field installations. Although work completion data delays are not a preference for PG&E, ensuring data accuracy in alignment with PGE’s system of record is a priority.

To align PG&E’s system of record with the data provided to Energy Safety, PG&E will be issuing a revision to its 2024 Q4 dataset, removing records as necessary, after a thorough review. Additionally, PG&E will be reviewing its GH-06 program data for 2024 (Q1 through Q3) and 2023 (all quarters) to ensure accuracy and will submit revisions for any other prior submission that have been affected by the identified root cause.

Please do not hesitate to contact [WSComplianceMailbox@pge.com](mailto:WSComplianceMailbox@pge.com) if you have any questions regarding this matter.

Sincerely,

Daniel Kushner, PhD  
Senior Director, Electric Risk & Compliance

cc: Samuel Isaiah, Senior Utilities Engineer Specialist, Energy Safety  
Yana Loginova, Program Manager, Energy Safety  
Shannon Greene, Program & Project Supervisor, Energy Safety  
Cecilia Yaniz, Field Inspector, Energy Safety