



February 4, 2026

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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 December 9, 2025, Energy Safety conducted an inspection of PG&E's WMP initiatives in the vicinity of Pioneer, California in High Fire Threat District (HFTD) Tier 2. The initial findings of two dying trees were reported to PG&E via E-mail on December 19, 2025, as Wildfire Safety Concerns (WSCs). In response, PG&E prescribed full removal of one tree on July 11, 2025 under RX-06681045 and the second tree on December 22, 2025 under RX-05669471. On January 9, 2026, Energy Safety conducted a second inspection at the same location and observed that neither tree had been removed. The inspection report is enclosed herewith. Energy Safety found the following deficiency:

Deficiency 1. Energy Safety observed that in implementing its 2025 WMP initiative 8.2.2.2, which requires compliance with Public Resources Code section 4293, PG&E failed to remove two dead, declining or dying trees near coordinates 38.4315548168236, -120.5783171065. Energy Safety considers this non-performance to be in the Moderate risk category. PG&E must complete corrective actions for this non-performance by six months from the date of this notice.<sup>1</sup>

Within 30 days from the issuance date of this NON, 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 Docket<sup>2</sup> and the associated file name(s) must begin with the NON identification number.

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<sup>1</sup> Gov. Code section 15475.2(a)(2)

<sup>2</sup> <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.<sup>3</sup> Requests for informal conference with Energy Safety must be e-mailed to [environmentalscience@energysafety.ca.gov](mailto:environmentalscience@energysafety.ca.gov), with a copy sent to me and Elizabeth McAlpine, [Elizabeth.McAlpine@energysafety.ca.gov](mailto:Elizabeth.McAlpine@energysafety.ca.gov).

Sincerely,



Sheryl Bilbrey  
Program Manager | Environmental Science Division  
Office of Energy Infrastructure Safety  
[Sheryl.Bilbrey@energysafety.ca.gov](mailto:Sheryl.Bilbrey@energysafety.ca.gov)

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<sup>3</sup> 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.<sup>4</sup>

**Table 1. Risk Category and Correction Timelines**

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

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<sup>4</sup> Energy Safety Compliance Guidelines, p. 3



# Inspection Summary

Energy Safety found a “Moderate” deficiency near support structure ID 121820742 in HFTD Tier 2. PG&E failed to remove the danger trees.<sup>5</sup>

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_KJO_20251209_0959
Inspector:	Kelsea Jones
WMP Year Inspected:	2025
Quarterly Data Report (QDR) Referenced:	Quarter 3 (Q3) 2025
Inspection Selection:	Energy Safety inspected the locations based on PG&E’s Q3 2025 QDR and PG&E’s response to Energy Safety’s issued WSC.
Relevant WMP Initiative(s):	8.2.2.2 Vegetation Inspections - Distribution
Dates of inspection:	December 9, 2025 and January 9, 2026
City and/or County of Inspection:	Pioneer, California

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<sup>5</sup> PG&E “2023-2025 Base WMP”, published February 13, 2025. p. 670  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57976&shareable=true> accessed January 22, 2026).

# Inspection Findings

## Deficiency 1

### **Relevant Requirement:**

PG&E's WMP initiative 8.2.2.2 Vegetation Inspections – Distribution includes “different types of patrols designed to comply with state and federal laws and regulations”<sup>6</sup> including Public Resources Code section 4293, which requires the removal of dead, diseased, defective, and dying trees that could contact or fall onto conductors.<sup>7</sup>

### **Findings:**

Energy Safety considers this deficiency as a “Moderate” because PG&E has not removed the dying trees located within striking distance of conductors, consistent with the requirements of Public Resources Code section 4293. The continued presence of these trees presents an ongoing wildfire risk.

On December 9, 2025, Energy Safety conducted an inspection of PG&E's WMP initiatives in the vicinity of Pioneer, California. During the inspection, Energy Safety identified two dying pine trees near support structure ID 121820742 and at coordinates 38.4315548168236, -120.5783171065 along Golden Circle Drive. These initial findings were reported to PG&E via email on December 19, 2025 as Wildfire Safety Concerns (WSCs). In response, PG&E informed Energy Safety that it had prescribed full removal of one of the trees on July 11, 2025 under RX-05669471 and the second on December 22, 2025 under RX-06681045. On January 9, 2025, Energy Safety conducted a follow-up inspection and confirmed that neither of the trees had been removed. The inspector's observations are documented in photos 1, 2, and 3, which are exhibits to this report.

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<sup>6</sup> PG&E “2023-2025 Base WMP”, published February 13, 2025. p. 670  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57976&shareable=true> accessed January 22, 2026).

<sup>7</sup> [https://leginfo.legislature.ca.gov/faces/codes\\_displaySection.xhtml?sectionNum=4293.&lawCode=PRC](https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=4293.&lawCode=PRC), accessed January 15, 2026

# Exhibits

Exhibit A: Photo Log

Structure ID: 121820742

Deficiency 1



**Photo 1:** Photo of two dying pine trees during the inspection on December 9, 2025.



**Photo 2:** Photo of the same dying pine trees during the inspection on January 9, 2026.





**Photo 3:** Photo of the dying pine trees during the inspection on January 9, 2026.