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Via Electronic Filing

Caroline Thomas Jacobs, Director
Office of Energy Infrastructure Safety
California Natural Resources Agency
715 P Street, 20th Floor
Sacramento, CA 95814
caroline.thomasjacobs@energysafety.ca.gov

Re: PG&E's Request for 2025 Safety Certification Pursuant to Public Utilities Code § 8389 - Addendum

Dear Director Thomas Jacobs:

Pursuant to Public Utilities Code (Pub. Util. Code) Section 8389(e)-(f), Pacific Gas and Electric Company (PG&E) respectfully submits this addendum to its safety certification request submitted on December 2, 2025.

An electrical corporation's safety certification is valid for 12 months following the issuance of the certification.¹ Prior to the expiration of the safety certification, an electrical corporation must submit a request for a new safety certificate consistent with the schedule issued by the Office of Energy Infrastructure Safety (Energy Safety).² Pub. Util. Code Section 8389(f)(4) provides that "a safety certification shall remain valid until the division acts on the electrical corporation's pending request for safety certification." PG&E timely filed a request for new safety certification on December 2, 2025. While review is pending, PG&E's safety certification dated December 11, 2024, will remain in effect.

According to the 2025 Safety Certification Guidelines, Energy Safety instructs that:

If any element required for a Safety Certification request is missing at the time of the request (e.g., Energy Safety has not yet issued a decision on the electrical corporation's most recent WMP), an electrical corporation may submit the missing element subsequent to the initial Safety Certification request. Missing elements must be submitted at least ten days prior to the scheduled publication

¹ Pub. Util. Code Section 8389(f)(1).

² Pub. Util. Code Section 8389(f)(2); Energy Safety 2025 Safety Certification Request Submission Schedule. (Nov. 7, 2025).

date of Energy Safety’s decision on the electrical corporation’s Safety Certification request.³

PG&E submits the following updates below to supplement its safety certification request filed on December 2, 2025, currently pending review by Energy Safety.

(1) Final Approval Issued On PG&E’s Base 2023-2025 WMP

Pursuant to Pub. Util. Code Section 8389(e)(1), a utility must have an approved Wildfire Mitigation Plan (WMP) in order to apply for a safety certification. Pub. Util. Code Section 8386.3(a) states that a utility’s approved WMP “shall remain in effect” until Energy Safety approves that utility’s subsequent plan.

When we submitted our safety certification request, Energy Safety had not yet issued a final decision on our 2026-2028 Base WMP.⁴ As such, the Base 2023-2025 WMP remained in effect and served as our most recently approved plan for safety certification purposes. On February 5, 2026, Energy Safety issued its final decision, approving our 2026-2028 Base WMP.⁵ With this approval, we satisfied the safety certification requirement of having “an approved wildfire mitigation plan” pursuant to Pub. Util. Code Section 8389(e)(1).

(2) Good Standing Satisfied By Agreement To Implement Findings In Energy Safety’s 2024 Safety Culture Assessment Report

As part of the safety certification process, Pub. Util. Code Section 8389(e)(2) requires an electrical corporation to be in “good standing,” which can be satisfied by the utility agreeing to implement the findings of its most recent safety culture assessment.

In our safety certification request, we stated that the results of our 2024 Safety Culture Assessment had not yet been released. Shortly thereafter, Energy Safety issued PG&E’s 2024 Safety Culture Assessment Report in a letter dated December 19, 2025, with instructions that PG&E document its agreement for purposes of Section 8389(a)(2) via a letter submitted to Energy Safety.

On January 5, 2026, we notified Energy Safety that we agreed to implement all of the findings and recommendations in the Safety Culture Assessment and committed to work with Energy Safety on this implementation.⁶ Accordingly, PG&E has thus satisfied the requirement that it is in “good standing” pursuant to Pub. Util. Code Section 8389(e)(2). Each quarter we will provide Energy Safety with an update on our progress in implementing these recommendations through our Quarterly Notification letter.

³ See 2025 Guidelines at 2.

⁴ At the time of filing, Energy Safety issued a draft decision approving our 2026-2028 Base WMP on November 26, 2025.

⁵ Energy Safety Decision on PG&E’s 2026-2028 Base WMP (Feb. 5, 2026).

⁶ See Agreement of PG&E to Implement the Recommendations of the Final 2024 Safety Culture Assessment Report (Jan. 5, 2026).

(3) Energy Safety’s Decision on PG&E’s 2025 Executive Compensation Structure

Pub. Util. Code Sections 8389(e)(4) and (6) require that an electrical corporation provide documentation that it has established an executive incentive compensation structure that has been approved by Energy Safety. In order to obtain Energy Safety’s approval, this compensation structure must promote safety as a priority, ensure public safety and utility financial stability through the use of performance metrics for executive officers, and include incentive compensation that is based on meeting measurable and enforceable performance metrics.⁷ Additionally, this compensation structure must be based on, among other things, the principles of strict limitations on guaranteed cash, the elimination of guaranteed monetary incentives, incentivizing long-term performance, and the minimization of indirect compensation.⁸

On May 23, 2025, we submitted our 2025 Executive Compensation Structure. When we submitted our safety certification request, the 2025 Executive Compensation Structure was still pending Energy Safety’s review and final approval. Energy Safety issued a final decision on December 29, 2025, approving our 2024 Executive Compensation Structure. Energy Safety concluded that it meets the statutory requirements of Pub. Util. Code Section 8389(e)(4) and 8389(e)(6) and the Executive Compensation Structure Guidelines Version 1.0.⁹

Conclusion

With the updates provided above, PG&E meets the requirements of Pub. Util. Code Section 8389(f)(e). We respectfully request Energy Safety to issue a safety certification within the prescribed statutory period. Should Energy Safety have any questions regarding this request, please do not hesitate to contact Wade Greenacre, Regulatory Affairs Director, at wade.greenacre@pge.com.

Sincerely,

Sumeet Singh
Executive Vice President, Energy Delivery
and
Chief Executive Officer
Pacific Gas and Electric Company

⁷ P.U.C. § 8389(e)(4).

⁸ P.U.C. § 8389(e)(6).

⁹ See Energy Safety Decision on PG&E’s 2025 Executive Compensation Structure (Dec. 29, 2025). Recent legislative changes from SB 254 (2025-2026), signed into law and effective on September 19, 2025, amended the Public Utilities Code sections for Executive Compensation. Energy Safety states, “This decision is based on the Public Utilities Code sections and section numbers for Executive Compensation that existed at the time of the electrical corporation’s submission of its Executive Compensation Structure. Future executive compensation structure decisions will be evaluated by Energy Safety under the newly amended Public Utilities Code sections.”