



February 27, 2026

Daniel Kushner
DDKO@pge.com
Senior Director- Electric Risk and Compliance
Pacific Gas and Electric Company
300 Lakeside Drive Suite 210,
Oakland, CA 94612

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 Company (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 January 14, 2026, Energy Safety conducted an inspection of PG&E's WMP initiatives in the vicinity of the city of Oroville, California in High Fire Threat District (HFTD) Tier 3. The inspection report is enclosed herewith. Energy Safety found the following deficiency:

Deficiency 1. Energy Safety observed that in implementing 2025 WMP initiative VM-04 Tree Removal Inventory, PG&E failed to adhere to its protocol of wood and slash management near pole ID 121273750 and Vegetation Management ID VP_AU114-A22_4208329_2022 at coordinates 39.4879967598739, -121.306532906652. Energy Safety considers this non-performance to be in the Moderate risk category. PG&E must complete 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, 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 10 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 me 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:

Mandy Knockaert, Mandy.knockaert@pge.com
Electricdatarequests@pge.com
WSComplianceMailbox@pge.com

³ Energy Safety Performance 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

⁴ Energy Safety Performance Guidelines, p. 4



Inspection Summary

Energy Safety found a “Moderate” deficiency near pole ID 121273750 in HFTD Tier 3. PG&E did not perform its Wood and Slash Management (WMP Initiative 8.2.3.2) program as required in the WMP, instead slash was left piled on site.

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_MAZ_20260114_1444
Inspector:	Max Zazzeron
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 QDR.
Relevant WMP Initiative(s):	8.2.3.2 Wood and Slash Management
Date of inspection:	January 14, 2026
City and/or County of Inspection:	Oroville, Butte County

Inspection Findings

Deficiency 1

Relevant Requirements:

PG&E's WMP initiative 8.2.3.2 Wood and Slash Management states that, "Utility work on vegetation creates debris and wood products which, if left unmanaged, can become fuel for wildfire. PG&E is required to reduce or adjust live fuels as they are generated from programs developed to comply with PRC [Public Resources Code section] 4293, General Order 95 Rule 35 and Pub. Util. Code [Public Utility Code] 8386."⁵

PG&E's WMP initiative continues by stating, "PG&E's VM [vegetation management] Programs define debris as material less than 4 inches in diameter and large wood as material greater than 4 inches in diameter... Debris less than 4 inches in diameter that is generated during pruning activities are chipped or lopped and scattered on the property in accordance with applicable regulations...."⁶

PG&E lists Best Management Practices for Vegetation Management Activities (TD-7102P-01-JA01) as a governing standard for its slash management program,⁷ PG&E's protocol TD-7102P-01-JA01 states, "Woody debris created by chipping, lop and scatter, or brush mowing operations must be left at an average depth of less than 18 inches from the ground surface unless otherwise specified in an easement or landowner agreement."⁸

Findings:

Energy Safety considers this deficiency "Moderate" because the slash pile is over 18-inches in height, creating a potential fuel source for wildfire.

At VMP ID VP_AU114-A22_4208329_2022 near pole ID 121273750, PG&E reported it completed work under its Tree Removal Program. PG&E's Q3 data reports that its crew removed a 19-inch Diameter at Breast Height, 72-foot tall black oak on July 2, 2025. Energy Safety's inspector observed slash and woody debris from the tree piled approximately 4-feet at its tallest point. The inspector's observation is documented in photos 1, 2, 3, and 4, which are exhibits to this report.

⁵ PG&E's 2023-2025 WMP (Rev. #4.1, Jun. 7, 2024), p. 277

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>, accessed Feb. 5, 2026)

⁶ PG&E's 2023-2025 WMP (Rev. #4.1, Jun. 7, 2024), p. 680

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>, accessed Feb. 5, 2026).

⁷ PG&E's 2023-2025 WMP (Rev. #4.1, Jun. 7, 2024), p. 680

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56791&shareable=true>, accessed Feb. 5, 2026).

⁸ Pacific Gas and Electric Company. (n.d.). General best management practices for all VM (TD-7102P-01-JA01) (Rev. 1, Jan. 6, 2022), p. 12 (<https://www.pge.com/assets/pge/docs/outages-and-safety/outage-preparedness-and-support/td-7102p-01-ja01-general-best-management-practices-for-all-vm.pdf>, accessed Feb. 5, 2026)

Energy Safety sent PG&E Data Request (DR) OIES-E-INP_2026-PG&E-008 on January 22, 2026, inquiring about the vegetation management activities at the site. PG&E's response to the data request confirmed that the slash and woody debris were associated with VMP ID VP_AU114-A22_4208329_2022.

Exhibits

Exhibit A: Photo Log

Structure ID: 121273750

Deficiency 1



Photo 1: Photo of the removed black oak.



Photo 2: Photo of the pile of wood and slash debris.



Photo 3: Photo of the pile of wood and slash debris measuring approximately four feet in height.



Photo 4: Photo of secondary view of wood and slash debris from roadway.