

March 6, 2026

Sheryl Bilbrey  
Program Manager | Environmental Science Division  
Office of Energy Infrastructure Safety  
715 P Street, 20<sup>th</sup> Floor  
Sacramento, CA 95814

RE: Energy Safety NON ID: ESD\_PGE\_KJO\_20251209\_0959  
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 Ms. Bilbrey:

This letter is in response to the above referenced Notice of Nonperformance (NON) dated February 4, 2026, regarding the Office of Energy Infrastructure Safety (Energy Safety) inspection of Pacific Gas and Electric Company's (PG&E) 2025 Wildfire Mitigation Plan (WMP) initiatives completed per the locations submitted in its Q3 2025 QDR, in reference to a Wildfire Safety Concern (WSC) response reported to PG&E on December 19, 2025.

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 December 9, 2025 inspection by Energy Safety in the vicinity of the city of Pioneer, CA, a Tier 2 - High Fire Threat District (HFTD) of PG&E's Q3 QDR report for WMP Initiative 8.2.2.2 – Vegetation Inspections - Distribution:

*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.*

## **Response**

PG&E acknowledges that the tree listed under RX-05669471 was removed outside the prescription date. The tree listed under RX-06681045 was removed within the prescription date timeline. PG&E views only one tree to be out of compliance per the December reported Wildfire Safety Concern (WSC).

PG&E has completed corrective action for the two trees identified in the Notice of Non-Performance. Both trees were removed on January 21, 2026 as shown in the two photos below.

Please do not hesitate to contact [WSCComplianceMailbox@pge.com](mailto:WSCComplianceMailbox@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  
Patrick Doherty, Program Manager, Energy Safety  
Elizabeth McAlpine, Supervisory Environmental Scientist, Energy Safety  
Kelsea Jones, Field Inspector, Energy Safety

Photo 1



Photo 2

