



March 26, 2026

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NOTICE OF NONPERFORMANCE

Mr. Daniel Kushner:

Pursuant to Government Code section 15472, et seq, the Office of Energy Infrastructure Safety (Energy Safety) conducted inspections of work completed by Pacific Gas and Electric (PG&E) in accordance with its 2025 Wildfire Mitigation Plan (WMP). During the inspections, Energy Safety determined the existence of non-performance requiring correction. Energy Safety therefore issues PG&E a Notice of Non-Performance (NON).

On March 11, 2026, Energy Safety conducted an inspection of PG&E's WMP initiatives in the vicinity of Mokelumne Hill, California within High Fire Threat District (HFTD) Tier 2 and the State Responsibility Area (SRA). The inspection report is enclosed herewith. Energy Safety found the following deficiency:

Deficiency 1. Energy Safety observed that PG&E failed to implement its 2025 WMP initiative 8.2.2.2, which requires compliance with Public Resource Code 4293, by not maintaining a four-foot clearance distance around the primary conductors near coordinates 38.30124, -120.50330. Energy Safety considers this non-performance to be in the Moderate risk category. PG&E must complete a corrective action for this non-performance by six 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.

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

¹ Gov. Code section 15475.2(a)(2)

² <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2025%20NON>

³ Energy Safety Performance Guidelines, p. 4

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,

A handwritten signature in cursive script that reads "Sheryl Bilbrey".

Sheryl Bilbrey
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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 of its WMP initiatives.

Energy Safety has designated this finding of a deficiency as a “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 122368402 in HFTD Tier 2. PG&E failed to maintain vegetation at least four feet away from the primary conductors.⁵

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_RGA_20260311_1117
Inspector:	Ricardo Garcia
WMP Year Inspected:	2025
Quarterly Data Report (QDR) Referenced:	Quarter 4 (Q4) 2025
Inspection Selection:	Energy Safety inspected the locations based on PG&E’s Q4 QDR.
Relevant WMP Initiative(s):	8.2.2.2 Vegetation Inspections - Distribution
Date of inspection:	March 11, 2026
City and/or County of Inspection:	Mokelumne Hill, California

⁵ 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 March 17, 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” including Public Resources Code section 4293,⁶ which requires that PG&E maintain a four-foot minimum clearance distance in all directions between all vegetation and all conductors for power lines between 2,400 volts and 72,000 volts.⁷

Findings:

Energy Safety considers this deficiency as a “Moderate” because PG&E failed to maintain the required minimum clearance distance between vegetation and its conductors, consistent with the requirements of Public Resources Code section 4293. A cedar tree was growing within the four-foot clearance distance, and the continued encroachment presents a wildfire risk.

On March 11, 2026, Energy Safety conducted an inspection of PG&E's WMP initiatives in the vicinity of Mokelumne Hill, California. During the inspection, Energy Safety identified a cedar tree growing within the four-foot minimum clearance distance near pole ID 122368402 and near coordinates 38.30124, -120.50330 along Railroad Flat Road. The cedar tree is located within the SRA. The inspector measured the distance between the primary conductors and the closest branches of the cedar tree using a Nikon Forestry Pro II laser range finder. The measured distance was no more than 3.5 feet, which is less than the required four-foot clearance. According to the asset ArcGIS layer provided by PG&E, the operating voltage of the primary conductors is 12,000 volts. The cedar tree has a diameter at breast height of 15 inches, is approximately 40 feet tall, and is located approximately 27 feet north of the pole ID 122368402. The inspector's observations are documented in Exhibit A photographs, which are attached to this report. Photo 1 depicts pole ID 122368402. Photos 2, 3, and 4 depict the cedar tree encroaching into the four-foot minimum clearance distance.

⁶ 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 March 17, 2026).

⁷ https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=4293.&lawCode=PRC, accessed March 17, 2026

Exhibits

Exhibit A: Photo Log

Structure ID: 122368402

Deficiency 1



Photo 1: Photo of pole ID 122368402 located approximately 27 feet south of the subject tree.

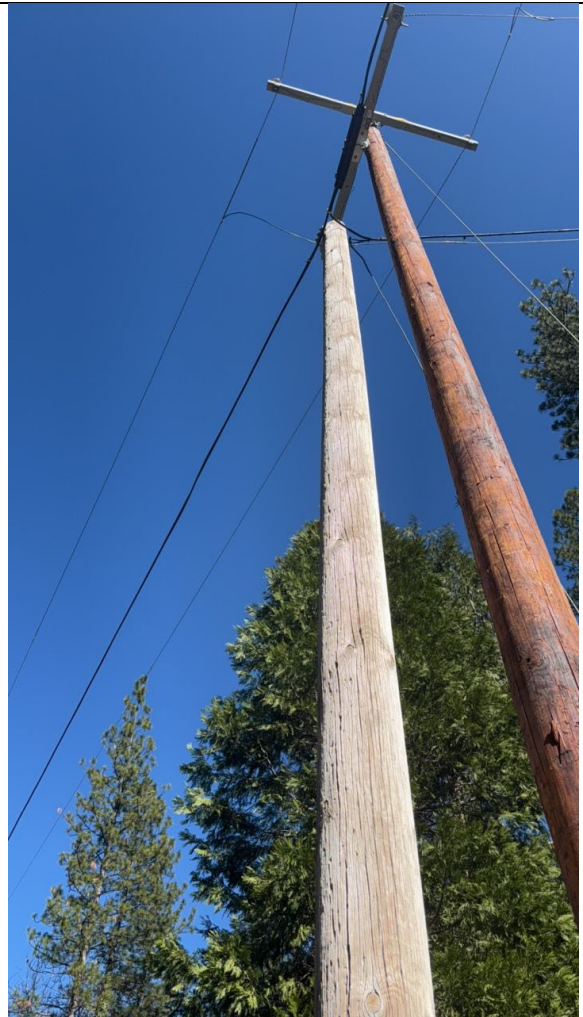


Photo 2: Photo of the cedar tree encroaching within the four-foot minimum clearance distance from the primary conductor.



Photo 3: Close-up photo of the same cedar tree encroaching within the four-foot minimum clearance distance from the primary conductor.



Photo 4: Additional photo of the same cedar tree encroaching within the four-foot minimum clearance distance from the primary conductor. Photo taken north of the tree and pole looking south.