

March 30, 2026

Patrick Doherty
Program Manager | Performance Assurance Division
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

RE: **Energy Safety NON-ID: PAD_PGE_RMA_20251216_1412**
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 Mr. Doherty:

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) reported to PG&E on December 19, 2025.

Energy Safety based its compliance assessment on the following statutory provisions:

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.

On December 16, 2025, Energy Safety conducted an inspection of PG&E's WMP initiatives in the vicinity of the city of Angwin, California. Energy Safety found the following deficiency:

Deficiency 1. Energy Safety observed that in implementing the 2025 WMP initiative - 8.1.2.10.5 - Non-Exempt Expulsion Fuses, PG&E failed to complete the installation of a non-exempt expulsion fuse on Pole ID 256495, Grid Hardening ID 31699597 at coordinates 38.5593907604486, -122.433882999691. Energy Safety considers this non-performance to be in the Minor risk category. PG&E must complete a corrective action for this deficiency by 12 months of this notice.

Response

We respectfully disagree with Energy Safety's conclusion that PG&E failed to complete the installation of a non-exempt expulsion fuse on Pole ID 256495. The location identified in PAD_PGE_RMA_20251216_1412, Notice of Non-Performance (NON) is compliant with the requirements of GH-10. PG&E's Non-Exempt Expulsion Fuse program, which focuses on reducing wildfire ignition risk by replacing and/or removing non-exempt fuses. In this instance, **all** non-exempt fuses have been removed from the structure. Thus, the removal of the non-exempt fuses meets the completion requirements of this WMP initiative.

The non-exempt fuse at this location was removed in April of 2025, as demonstrated in the attached Quality Control (QC) report of April 21, 2025, PGE_NON_PAD_PGE_RMA_20251216_1412_20260330_ATCH001_CONF.pdf.

Furthermore, this circuit was identified as part of the undergrounding effort, In the meantime, we removed the fuse link for the transformer and the Solid Blade 3711 from service.

Please do not hesitate to contact 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
Yana Loginova, Program Manager, Energy Safety
Shannon Greene, Program & Project Supervisor, Energy Safety
Alexander Scott, Field Inspector, Energy Safety

Attachment:

- *PGE_NON_PAD_PGE_RMA_20251216_1412_20260330_ATCH001_CONF.pdf*