

March 30, 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: NON\_ESD\_PGE\_RIB\_20260113\_1358  
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 27, 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.”*

This NON was identified from a January 13, 2026 by Energy Safety in the vicinity of the city of Hurlerton, California in High Fire Threat District (HFTD) Tier 2. Energy Safety found the following deficiency:

*Deficiency 1. Energy Safety observed that in implementing 2025 WMP initiative 8.2.2.2.3 Vegetation Management for Operational Mitigations (VMOM), PG&E failed to adhere to its protocol of wood and slash management approximately 130 feet northwest of pole ID 100429855 and Vegetation Management ID VP\_AT114-B10\_1086513\_2019 at coordinates 39.5139856171174, -121.405248344553. 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 date of this notice.*

## **Response**

Regarding the Energy Safety issued Notice of Nonperformance (NON) for a failure to adhere to wood and slash management near Pole ID 100429855 inspected on January 13, 2026, PG&E has completed debris removal on February 6, 2026, for VP\_AT114-B10\_1086513\_2019 in accordance with Best Management Practices (BMP) 27.

Refer to the attachment "*NON\_ESD\_PGE\_RIB\_20260113\_1358\_Q01\_ATCH01\_CONF.pdf*" with photos documenting the site cleanup and debris removal in accordance with BMP 27.

Please do not hesitate to contact [WSComplianceMailbox@pge.com](mailto:WSComplianceMailbox@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  
Ramzi Ibrahim, Field Inspector, Energy Safety