



April 3, 2026

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## **NOTICE OF NON-PERFORMANCE**

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 Company (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 10, 2026, Energy Safety conducted an inspection of PG&E's WMP initiatives in the vicinity of the city of Wilseyville, California within High Fire Threat District (HFTD) Tier 3 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 8.2.3.4, which requires compliance with Public Resources Code section 4293, by not removing a declining or dying pine tree near coordinates 38.37407283102526, -120.50554002118581. 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.<sup>1</sup>

Within 30 days from the issuance date of this NON, PG&E must provide a response advising Energy Safety of corrective action taken or planned to remedy the identified deficiency.

This response shall be filed in the Energy Safety e-Filing system under the 2025 NON Docket<sup>2</sup> and the associated file name(s) must begin with the NON identification number.

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<sup>1</sup> Gov. Code section 15475.2(a)(2)

<sup>2</sup> <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.<sup>3</sup> Requests for informal conference with Energy Safety must be e-mailed to [environmentalscience@energysafety.ca.gov](mailto:environmentalscience@energysafety.ca.gov), with a copy sent to me and Elizabeth McAlpine, [Elizabeth.McAlpine@energysafety.ca.gov](mailto:Elizabeth.McAlpine@energysafety.ca.gov).

Sincerely,



Sheryl Bilbrey  
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Office of Energy Infrastructure Safety  
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<sup>3</sup> 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 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.<sup>4</sup>

**Table 1. Risk Category and Correction Timelines**

Risk Category	Deficiency correction timeline
Severe	<ul style="list-style-type: none"><li>• Immediate resolution</li></ul>
Moderate	<ul style="list-style-type: none"><li>• 2 months (in High Fire Threat District (HFTD) Tier 3)</li><li>• 6 months (in HFTD Tier 2)</li><li>• 6 months (if relevant to worker safety; not in HFTD Tiers 2 or 3)</li></ul>
Minor	<ul style="list-style-type: none"><li>• 12 months</li></ul>

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<sup>4</sup> Energy Safety Performance Guidelines, p. 4



# Inspection Summary

Energy Safety found a “Moderate” deficiency near pole ID 122142062 in HFTD Tier 3. PG&E failed to remove the danger tree.<sup>5</sup>

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_GCA_20260310_1036
Inspector:	Gary Candelas
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 2025 QDR.
Relevant WMP Initiative(s):	8.2.3.4 Fall-In Mitigation
Date of inspection:	March 10, 2026
City and/or County of Inspection:	Wilseyville, California

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<sup>5</sup> PG&E “2023-2025 Base WMP”, published February 13, 2025. p. 691  
([PG&E’s 2023-2025 Wildfire Mitigation Plan R7](#) accessed March 13, 2026).

# Inspection Findings

## Deficiency 1

### **Relevant Requirement:**

PG&E's WMP initiative 8.2.3.4 Fall-In Mitigation states: "PG&E's Regulatory Compliance work starts with an annual patrol of all PG&E distribution lines to support compliance with the CPUC's GO 95 Rule 35, and California PRC Section 4293. Every year, we inspect trees along our entire distribution system— approximately 80,000 miles of overhead distribution lines.... The objective of the Second Patrol is to maintain radial clearance between vegetation and conductors by identifying trees that will encroach within the MDRs and by identifying dead, dying, and declining trees that may fail and strike conductors."<sup>6</sup>

Additionally, 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,<sup>7</sup> which requires the removal of dead, diseased, defective, and dying trees that could contact or fall onto conductors.<sup>8</sup>

### **Findings:**

Energy Safety considers this deficiency as a "Moderate" because PG&E has not removed the dying tree located within striking distance of conductors, consistent with the requirements of Public Resources Code section 4293. The continued presence of this tree presents ongoing wildfire risk.

On March 10, 2026, Energy Safety conducted an inspection of PG&E's WMP's initiatives in the vicinity of Wilseyville, California. During the inspection, Energy Safety identified a dying pine tree near pole ID 122142062 and near coordinates 38.37407283102526, -120.50554002118581 at 3702 Blue Mountain Road. The pine tree has a diameter at breast height of 19 inches and is approximately 126 feet tall. It is located north of pole ID 122142062, east of the conductors and has a "No Trespassing" sign attached. The pine tree is located within the State Responsibility Area (SRA). It exhibits dying and thinning needles, and the trunk shows orange bark discoloration possibly due to insect infestation as well as multiple insect burrowing holes. The inspector's observations are documented in photos 1 and 2, which are exhibits to this report.

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<sup>6</sup> PG&E "2023-2025 Base WMP", published February 13, 2025. p. 691 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57976&shareable=true> accessed April 3, 2026).

<sup>7</sup> PG&E "2023-2025 Base WMP", published February 13, 2025. p. 670 ([PG&E's 2023-2025 Wildfire Mitigation Plan R7](#) accessed March 18, 2026).

<sup>8</sup> [https://leginfo.legislature.ca.gov/faces/codes\\_displaySection.xhtml?sectionNum=4293.&lawCode=PRC](https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=4293.&lawCode=PRC), accessed March 13, 2026.

# Exhibits

Exhibit A: Photo Log

Structure ID: 122142062

Deficiency 1



**Photo 1:** Photo of the dying pine tree near the conductors.



**Photo 2:** Closer view of the dying pine tree showing orange bark discoloration and thinning needles.