

April 10, 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_BKA_20251119_1214
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) 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.”

On November 19, 2025, Energy Safety conducted an inspection of Pacific Gas and Electric Company’s WMP initiatives in the vicinity of the city of Cambria, California. Energy Safety found the following data inaccuracies:

Data Inaccuracy 1. On Pole ID 121798717, Grid Hardening ID 123347214 at coordinates 35.5445319974426, -121.084874539239, the inspector observed that PG&E failed to adhere to data accuracy.

Response

We respectfully disagree with Energy Safety’s finding of inaccurate data being provided on Open Work Orders – Distribution Tags. The backlog of tags is a measure of the change in quantity of open tags, which includes tags that are either cancelled or completed during the reporting period. Therefore, there is no need to correct any data inaccuracy.

Two notifications had been created for the replacement of Pole #121798717. Notification 123347214 was completed upon the replacement of the pole; Notification 124941506 was cancelled as it was no longer necessary.

Per Footnote 124 on page 377 of the 2023-2025 Wildfire Mitigation Plan, “The backlog of tags is a measure of the change in quantity of open ignition EC tags known as of January 5, 2023 and found prior to Jan 1, 2023, in HFTD/HFRA locations.”

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
Babak Kaviani, Field Inspector, Energy Safety