



Laura M. Fulton
Senior Counsel
8330 Century Park Court, CP32F
San Diego, CA 92123-1548
LFulton@SDGE.com

June 24, 2026

VIA ELECTRONIC FILING

Docket # 2025 NODI

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

**RE: San Diego Gas & Electric Company's Response to Notice of Data Inaccuracy –
NODI_PAD_SDGE_SIS_20260408_0959**

Dear Program Manager Doherty:

San Diego Gas & Electric Company (SDG&E) provides this response to the finding identified in the Notice of Data Inaccuracy "NODI_PAD_SDGE_SIS_20260408_0959" (Notice of Data Inaccuracy or NODI) issued by the Office of Energy Infrastructure Safety's (Energy Safety) on June 17, 2026 regarding Energy Safety's inspection of work completed by SDG&E in accordance with its 2025 Wildfire Mitigation Plan (WMP). Specifically, the NODI describes that on April 8, 2026, Energy Safety conducted an inspection of SDG&E's WMP initiatives in the vicinity of the city of Valley Center, California and found the following data inaccuracies:

Data Inaccuracy 1. On Pole ID P519983, Grid Hardening ID 300000596492_P519983_92431 at coordinates 33.329414, -117.104047, the inspector observed that covered conductor was installed on the reported pole; however, no lightning arrester was observed to have been upgraded or installed.

SDG&E is not requesting a written hearing for the findings addressed in this response; however, SDG&E reserves the right to raise these points in subsequent procedural stages and/or proceedings as necessary. Further, although Energy Safety has the right to refer certain notices to the California Public Utilities Commission for enforcement action, the findings in this notice do not merit referral, as there is inadequate support for a finding that SDG&E has failed to substantially comply with its approved WMP.¹

¹ See Pub. Util. Code §8386.1.

I. SDG&E RESPONSE

A. Data Inaccuracy 1 – Inaccurate Data Provided on Lighting Arrester Removal and Replacement (Upgrade)

For Pole P519983, within the combined covered conductor project “0350-P-CC,” the scope of work was to permanently remove the transformer, fuses, and non-exempt CalFire lightning arresters. Accordingly, the “DescriptionOfWork” field should have reflected “Removed” rather than “Upgraded.” SDG&E is implementing corrective measures to ensure removals are accurately recorded in its future quarterly data reports (QDR) submitted to Energy Safety. The photos below show the pole top before and after construction.

Photo 1 - Before Construction ESH C0350 P CC:



Photo 2 - After Construction ESH C0350 P CC:



II. CONCLUSION

SDG&E appreciates Energy Safety's continued efforts to identify, communicate, and work together to promote wildfire safety throughout California.

Respectfully submitted,

/s/ Laura M. Fulton

Attorney for
San Diego Gas and Electric Company