



May 4, 2026

Crystal Bertolini
Wildfire Mitigation Compliance
San Diego Gas and Electric Company
8316 Century Park Court, CP32F
San Diego, CA 92123

NOTICE OF NON-PERFORMANCE

Ms. Crystal Bertolini:

Pursuant to Government Code section 15472, et seq, the Office of Energy Infrastructure Safety (Energy Safety) has conducted an inspection of work completed by San Diego Gas and Electric Company (SDG&E) in accordance with its 2025 Wildfire Mitigation Plan (WMP) and determined the existence of non-performance requiring correction. Energy Safety therefore issues SDG&E a Notice of Non-Performance (NON).

On February 10, 2026, Energy Safety conducted an inspection of SDG&E's WMP initiatives in the vicinity of the city of Ramona, California within High Fire Threat District (HFTD) Tier 2 and the State Responsibility Area (SRA). Energy Safety identified vegetation within the 10-foot clearance radius at a pole during the inspection. On April 13, 2026, Energy Safety conducted a second inspection at the same location and confirmed that vegetation remained at the base of the pole within the 10-foot radius. The inspection report is enclosed herewith. Energy Safety found the following deficiency:

Deficiency 1. Energy Safety observed that in implementing 2025 WMP initiative 8.2.3.1 Pole Clearing (WMP.512), which requires compliance with Public Resources Code (PRC) section 4292, SDG&E failed to maintain the required vegetation clearance at pole ID P610587 (Vegetation Management ID 365-XQ244), located near coordinates 33.0409399658502, -116.910492194103. Energy Safety considers this non-performance to be in the Moderate risk category. SDG&E must complete a corrective action for this non-performance by six months from the date of this notice.¹

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

This response shall be filed in the Energy Safety e-Filing system under the 2025 NON Docket² and the associated file name(s) must begin with the NON identification number.

¹ Gov. Code section 15475.2(a)(2)

² <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2025%20NON>

Prior to its response, SDG&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.³ Requests for informal conference with Energy Safety must be e-mailed to environmentalscience@energysafety.ca.gov, with a copy sent to me and Akiko Masuda, Akiko.Masuda@energysafety.ca.gov.

Sincerely,

Elizabeth McAlpine

Elizabeth McAlpine
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Office of Energy Infrastructure Safety
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Cc:

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³ 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 related to an electrical corporation’s execution of its WMP initiatives.

Energy Safety has designated this finding of deficiency as “Moderate” risk. SDG&E must correct the deficiency pursuant to the timeline provided in Table 1.⁴

Table 1. Risk Category and Correction Timelines

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

⁴ Energy Safety Performance Guidelines, p. 4



Inspection Summary

Energy Safety found a “Moderate” deficiency at pole ID P610587 within HFTD Tier 2 and the SRA. During the implementation of SDG&E’s Pole Clearing program (WMP initiative number 8.2.3.1), in accordance with its WMP and PRC 4292, the frequency of clearing activities was insufficient, resulting in regrowth of annual vegetation and the presence of desiccated stumps within the 10-foot radius, thereby creating an ongoing wildfire ignition risk.⁵

The inspection location and WMP initiative summary are included in Table 2.

Table 2: Inspection Location and Initiative Summary

Electrical Corporation:	SDG&E
Report Number:	NON_ESD_SDGE_KJO_20260210_1351
Inspector:	Kelsea Jones
WMP Year Inspected:	2025
Quarterly Data Report (QDR) Referenced:	Quarter 3 (Q3) 2025
Inspection Selection:	Energy Safety inspected the locations based on SDG&E’s Q3 QDR.
Relevant WMP Initiative(s):	8.2.3.1 Pole Clearing (WMP.512)
Date of inspection:	February 10, 2026 and April 13, 2026
City and/or County of Inspection:	Ramona, California

⁵ SDG&E “2023-2025 Base WMP”, published July 25, 2025. P. 278
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59036&shareable=true> accessed March 3, 2026).

Inspection Findings

Deficiency 1

Relevant Requirements:

SDG&E's WMP states its pole clearing program, initiative 8.2.3.1 (WMP.512), "is a fire prevention measure involving the removal of vegetation at the base of poles that carry specific types of electrical hardware that could cause sparking or molten material to fall to the ground. The clearance requirements in PRC § 4292 require the removal of all vegetation down to bare mineral soil within a 10-foot radius from the outer circumference of subject poles located within the boundary of the State Responsibility Area (SRA)."⁶

Additionally, SDG&E's WMP states, "Three separately scheduled pole brush activities are performed annually, including mechanical brushing, chemical application, and re-clearing. Pole brush inspection occurs in conjunction with tree inspection activity.... Re-clearing is a second mechanical activity performed on poles that are not cleared by a chemical application. The need to revisit and clear a subject pole multiple times for compliance is not uncommon due to leaf litter cast, vegetation regrowth, or material that has blown into the clearance area which cannot be controlled by mechanical or herbicide treatments. Pole clearing follows a specific annual, multi-activity schedule to remain compliant year-round."⁷

Findings:

Energy Safety considers this deficiency as "Moderate" because the regrowth of annual vegetation and the presence of desiccated stumps within the 10-foot clearance area of pole ID P61058 pose an ongoing wildfire risk.

SDG&E's Q3 2025 QDR data reported that vegetation around pole ID P610587 was cleared on August 6, 2025, under its 8.2.3.1 Pole Clearing (WMP .512) program, near coordinates 33.0409399658502, -116.910492194103. However, during a February 10, 2026 inspection, Energy Safety observed regrowth of annual vegetation within the 10-foot radius of the pole. On April 13, 2026, Energy Safety conducted a follow-up inspection and confirmed that the vegetation was still present and had begun to dry out.

The subject pole is located within HFTD Tier 2 and the SRA in San Diego County, where Cal FIRE has designated a year-around fire season.⁸ Additionally, SDG&E reported this pole as not exempt from Public Resources Code section 4292 requirements in its asset data submission. During the inspection, the inspector observed non-

⁶ SDG&E "2023-2025 Base WMP," published July 25, 2025. P. 278
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59036&shareable=true> accessed March 3, 2026).

⁷ SDG&E "2023-2025 Base WMP", published July 25, 2025. P. 280
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59036&shareable=true> accessed March 3, 2026).

⁸ CalFIRE Fire Season Declarations (<https://www.fire.ca.gov/our-impact/statistics> accessed April 17, 2026).

exempt solid blade disconnect fuses.⁹ Therefore, the pole is subject to the WMP vegetation management requirements under initiative 8.2.3.1 Pole Clearing (WMP .512), which mandates the removal of all vegetation to bare mineral soil within a 10-foot radius around the base of the pole. Therefore, SDG&E has committed to perform pole clearing activities at such poles.

The presence of vegetation and desiccated stumps approximately six and eight months after the reported clearing indicates that SDG&E did not re-visit and clear the pole as indicated in its WMP. The inspector's observation is documented in Exhibit A photographs, which are attached to this report. Photo 1 depicts pole ID P61058. Photos 2 and 3 depict the equipment present on the pole at the time of inspection. Photos 4, 5 and 6 depict vegetation growing at the base of the pole within the 10-foot radius during the February 10, 2026 inspection. Photos 7, 8, and 9 show the dry fuel source present at the base of the pole within the 10-foot radius during the April 13, 2026 inspection. Photo 10 depicts the desiccated stump during the April 13, 2026 inspection.

⁹ CALFIRE 2022, current edition available online, [California Powerline Equipment Identification Pocket Guide](#), p. 16, accessed April 21, 2026

Exhibits

Exhibit A: Photo Log

Structure ID: P610587

Deficiency 1



Photo 1: Pole ID P610587.



Photo 2: Overview of the equipment on pole ID P610587.

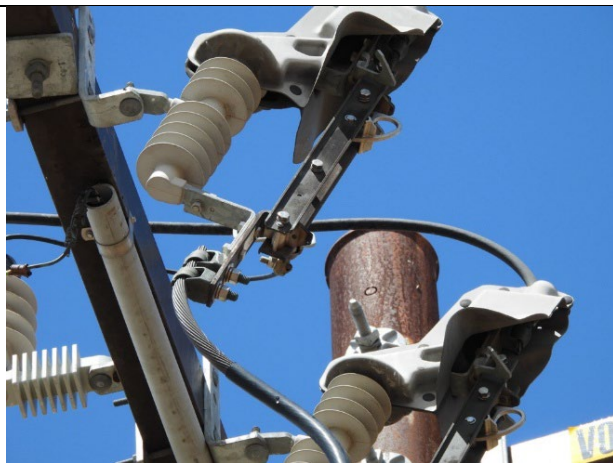


Photo 3: Closer view of the non-exempt solid blade disconnect on pole ID P610587.



Photo 4: Overview of the pole and regrowth of vegetation within the 10-foot radius of the pole, taken during the inspection on February 10, 2026



Photo 5: View of annual vegetation within the 10-foot radius of the pole, taken during the inspection on February 10, 2026.



Photo 6: View of annual vegetation and desiccated stumps within the 10-foot radius of the pole, taken during the inspection on February 10, 2026.



Photo 7: Overview of dry fuel source around pole ID P610587, taken during the inspection on April 13, 2026.



Photo 8: Photo depicting the 10-foot radius around pole ID P610587, taken during the inspection on April 13, 2026.



Photo 9: Additional photo depicting the 10-foot radius from pole ID P610587, taken during the inspection on April 13, 2026.



Photo 10: Photo depicting the desiccated palm stump, approximately 22 inches tall, taken during the inspection on April 13, 2026.