



June 23, 2026

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NOTICE OF DATA INACCURACY

Ms. Bertolini:

Pursuant to Government Code section 15472, et seq, the Office of Energy Infrastructure Safety (Energy Safety) has conducted an inspection of the 2026 Quarter 1 quarterly spatial data submission by San Diego Gas & Electric Company (SDG&E) in accordance with its 2026 Wildfire Mitigation Plan (WMP) and determined the existence of a data inaccuracy. Energy Safety therefore issues SDG&E a Notice of Data Inaccuracy (NODI). Failure to remedy this data inaccuracy may lead to a Notice of Non-Performance (NON) if the inaccuracy causes SDG&E to miss a WMP target or prevents Energy Safety from ensuring that SDG&E performed the targets and statements made in SDG&E's 2026 WMP.

On June 3, 2026, Energy Safety reviewed San Diego Gas & Electric Company's 2026 Quarter 1 quarterly spatial data submission. The report is enclosed herewith. Energy Safety found the following data inaccuracies:

Data Inaccuracy 1. The submitted data set contained 851 grid hardening data points and none of them were associated with FieldNotes, as required by version 4.1 of Energy Safety's Data Guidelines.

Within 30 days from the issuance date of this NODI, SDG&E should provide a response advising Energy Safety of corrective actions taken or planned to remedy the identified data inaccuracy or inaccuracies.

This response shall be filed in the Energy Safety e-Filing system under the 2026 NODI Docket,¹ and the associated file name(s) must begin with the NODI identification number.

¹ <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2026%20NODI>

Sincerely,

Patrick Doherty

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Office of Energy Infrastructure Safety

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INSPECTION REPORT

Electrical Corporation:	San Diego Gas & Electric Company
Report Number:	PAD_SDGE_YLO_20260603_1112
Date of Inspection:	June 3, 2026
City and/or County of Inspection:	Orange County
Inspector:	Yana Loginova
WMP Year Inspected:	2026
Quarterly Data Submission Referenced:	Quarter 1 (Q1) 2026
Inspection Selection:	Energy Safety viewed the contents of the Q1 2026 quarterly data submission and performed an analysis intended to allow the selection of WMP initiatives and locations for field inspection.
Relevant WMP Initiative(s):	Varies.
Inspection Purpose:	Assess the accuracy and completeness of San Diego Gas & Electric Company's quarterly data submission.

WMP Inspection Data Inaccuracies

Data Inaccuracy #	Structure ID	Grid Hardening ID	Lat/Long	HFTD	Initiative Number	Data Inaccuracy Description
Data Inaccuracy 1	Numerous	Numerous	Numerous	Varies	Varies	Required data not provided

Inspection Details

Relevant Requirement:

Version 4.1 of Energy Safety's Data Guidelines² require that each electrical corporation submit on a quarterly basis with their spatial data submissions a field called "FieldNotes" that reflects the field observations of the employees of the electrical corporation in conducting grid hardening work pursuant to a WMP. The Data Guidelines define "FieldNotes" as "[t]he latest-in-time 8,000 characters of field notes for the grid hardening activity kept in the electrical corporation's record-keeping system (e.g., SAP or Sales Force). This field is required."

Observations

SDG&E's Quarter 1 2026 quarterly spatial data submission, submitted to Energy Safety on April 30, 2026, contained spatial records related to 419 grid hardening points and 432 grid hardening lines. However, the quarterly spatial data submission did not include information required by the Data Guidelines in the "FieldNotes" field.

SDG&E included notes in their April 30, 2026, submission that justified failing to submit the required information in the "FieldNotes" field by stating that the required data was not readily available via existing processes, and that SDG&E was actively identifying all potential sources of field documentation and evaluating process, governance, and system alignment enhancements to be able to provide the information for future submissions. However, on May 22, 2026, SDG&E responded to an Energy Safety data request via email and submitted "FieldNotes" data for a subset of SDG&E's grid hardening points in its Q3 2025 and Q4 2025 quarterly spatial data submission.

Energy Safety concludes that the Q1 2026 quarterly spatial data submission from April 30, 2026, is inaccurate because of these facts:

1. Version 4.1 of Energy Safety's Data Guidelines requires the submission of the latest-in-time 8,000 characters of field notes for the grid hardening activity kept in the electrical corporation's record-keeping system in the "FieldNotes" field.
2. Data for the "FieldNotes" field were not submitted by SDG&E, despite evidence that SDG&E is capable of compiling and providing the data to Energy Safety.

Failure to rectify this data inaccuracy prior to the submission of any performance assessments, such as annual reports, may result in a notice of non-performance.

² Office of Energy Infrastructure Safety. (2025). Energy Safety Data Guidelines (Version 4.1), December 22, 2025, p. 65. [Online]. Available: [energy_safety_data_guidelines_v4.11.pdf](#)