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VIA ELECTRONIC FILING

Docket # 2026 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_YLO_20260603_1112**

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_YLO_20260603_1112" (Notice of Data Inaccuracy or NODI) issued by the Office of Energy Infrastructure Safety's (Energy Safety) on June 23, 2026 regarding Energy Safety's inspection of the 2026 Quarter 1 quarterly spatial data submission by SDG&E in accordance with its 2026 Wildfire Mitigation Plan (WMP). Specifically, the NODI describes that on June 3, 2026, Energy Safety reviewed SDG&E's 2026 Quarter 1 quarterly spatial data submission and 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.

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 – Required Data (FieldNotes) Not Provided

Energy Safety concludes that the Q1 2026 quarterly spatial data submission from April 30, 2026, is inaccurate because of the following claimed 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.

Regarding Fact 1, SDG&E's Q1 2026 quarterly spatial data submission complies with Energy Safety's Data Guidelines because field notes are not currently captured or maintained in SDG&E's record keeping system, SAP, in the requested text format.

Regarding Fact 2, the information SDG&E provided to Energy Safety on May 22, 2026 in response to a data request via email was not field notes, but instead the detailed description of work from the relevant Issue for Construction (IFC) packages, which may change in the as-built after the project is complete. This information was manually extracted from the IFC packages, which are in PDF format, for each traditional overhead hardening GhID provided by Energy Safety and inputted into an Excel spreadsheet, which required substantial time and effort.

That said, SDG&E will continue to work with Energy Safety to identify and provide the information Energy Safety needs to complete their duties.

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