



July 2, 2024

To: San Diego Gas & Electric Company  
Lena McMillin  
Wildfire Mitigation Program Manager  
8330 Century Park Court  
San Diego, CA 92123

**SUBJECT: Office of Energy Infrastructure Safety’s Audit and Report on San Diego Gas & Electric Company’s 2022 Vegetation Management Work**

Pursuant to the requirements of California Public Utilities Code section 8386.3(c)(5)(C), the Office of Energy Infrastructure Safety (Energy Safety) completed its final audit and report on San Diego Gas & Electric Company’s (SDG&E) 2022 vegetation management work pursuant to its 2022 Wildfire Mitigation Plan Update. Energy Safety finds that SDG&E substantially complied with the substantial portion of the vegetation management requirements in its 2022 Wildfire Mitigation Plan Update.

A copy of this report is issued to SDG&E, published on Energy Safety’s 2022 SVM Docket<sup>1</sup> and provided to the California Public Utilities Commission.

Sincerely,

A handwritten signature in black ink that reads "Sheryl Bilbrey". The signature is written in a cursive, flowing style.

Sheryl Bilbrey  
Program Manager | Environmental Science Division  
Office of Energy Infrastructure Safety

Cc:

Forest Kaser, CPUC  
Leslie Palmer, CPUC  
Laura Fulton, SDG&E  
Jonathan Woldemariam, SDG&E  
Kari Kloberdanz, SDG&E

---

<sup>1</sup> All documents related to SDG&E’s 2022 SVM audit are available on Energy Safety’s e-filing under the “[2022-SVM](https://efiling.energysafety.ca.gov/Lists/DocketLog.aspx?docketnumber=2022-SVM)” docket and available here: (<https://efiling.energysafety.ca.gov/Lists/DocketLog.aspx?docketnumber=2022-SVM>) [accessed July 2, 2024]



**OFFICE OF ENERGY INFRASTRUCTURE SAFETY**

**2022 SUBSTANTIAL VEGETATION  
MANAGEMENT AUDIT AND REPORT**

**SAN DIEGO GAS & ELECTRIC COMPANY**

July 2024



# TABLE OF CONTENTS

- 1. OVERVIEW ..... 1
- 2. AUDIT FINDINGS ..... 2
- 3. 2022 SVM AUDIT CONCLUSION ..... 4
- Appendix A..... A-1
  - A.1 Initiative 7.3.5.1 Additional Efforts to Manage Community and Environmental Impacts ..... A-2
  - A.2 Initiative 7.3.5.2 Detailed Inspections and Management Practices for Vegetation Clearances Around Distribution Electrical Lines and Equipment ..... A-9
  - A.3 Initiative 7.3.5.3 Detailed Inspections and Management Practices for Vegetation Clearances Around Transmission Electric Lines and Equipment ..... A-16
  - A.4 Initiative 7.3.5.4 Emergency Response Vegetation Management due to Red Flag Warning or Other Urgent Climate Conditions ..... A-17
  - A.5 Initiative 7.3.5.5 Fuel Management (including all wood management) and Reduction of “slash” from Vegetation Management Activities ..... A-19
  - A.6 Initiative 7.3.5.6 Improvement of Inspections ..... A-23
  - A.7 Initiative 7.3.5.7 Remote Sensing Inspections of Vegetation Around Distribution Electric Lines and Equipment ..... A-25
  - A.8 Initiative 7.3.5.8 Remote Sensing Inspections of Vegetation Around Transmission Electric Lines and Equipment ..... A-27
  - A.9 Initiative 7.3.5.9 Other Discretionary Inspection of Vegetation Around Distribution Electric Lines and Equipment, Beyond Inspections Mandated by Rules and Regulations A-28
  - A.10 Initiative 7.3.5.10 Other Discretionary Inspection of Vegetation Around Transmission Electric Lines and Equipment, Beyond Inspections Mandated by Rules and Regulations A-28
  - A.11 Initiative 7.3.5.11 Patrol Inspections of Vegetation Around Distribution Electric Lines and Equipment ..... A-29
  - A.12 Initiative 7.3.5.12 Patrol Inspections of Vegetation Around Transmission Electric Lines and Equipment ..... A-30
  - A.13 Initiative 7.3.5.13 Quality Assurance / Quality Control of Vegetation Management A-30
  - A.14 Initiative 7.3.5.14 Recruiting and Training of Vegetation Management Personnel . A-33
  - A.15 Initiative 7.3.5.15 Identification and Remediation of “at-risk species” ..... A-38
  - A.16 Initiative 7.3.5.16 Removal and Remediation of Trees with Strike Potential to Electric Lines and Equipment ..... A-40

A.17 Initiative 7.3.5.17 Substation Inspections ..... A-42  
A.18 Initiative 7.3.5.18 Substation Vegetation Management..... A-42  
A.19 Initiative 7.3.5.19 Vegetation Management System..... A-43  
A.20 Initiative 7.3.5.20 Vegetation Management to Achieve Clearances Around Electric  
Lines and Equipment ..... A-45  
A.21 Initiative 7.3.5.21 Vegetation Management Activities Post-Fire ..... A-46

**LIST OF TABLES**

Table 1. SDG&E 2022 SVM Audit Findings..... 2

# 1. OVERVIEW

Pursuant to Public Utilities Code section 8386.3(c)(5), the Office of Energy Infrastructure Safety (Energy Safety) must, on an annual basis, audit the vegetation management work performed by an electrical corporation upon notification that the electrical corporation has completed a substantial portion of the vegetation management requirements in its Wildfire Mitigation Plan (WMP).<sup>1</sup> In each audit, Energy Safety must specify any failure of the electrical corporation to fully comply with the vegetation management requirements in the WMP.<sup>2</sup>

San Diego Gas & Electric Company (SDG&E) submitted its substantial vegetation management (SVM) 2022 completion notification on December 21, 2022. As a result, Energy Safety has completed its SVM audit of SDG&E's vegetation management program activities for 2022. The 2022 WMP Update Guidelines included 21 vegetation management initiatives.<sup>2</sup> SDG&E's 2022 WMP Update included 21 vegetation management initiatives.<sup>3</sup> As part of the SVM audit process, Energy Safety identified both vegetation management quantitative commitments (e.g., number of inspections completed) and verifiable statements (e.g., training of personnel) from the SDG&E 2022 WMP Update. Energy Safety then compared vegetation management commitments and statements from SDG&E's WMP Update to the vegetation management work performed by SDG&E in 2022. Table 1 of this report includes a list of all vegetation management activities and Energy Safety's determination of whether SDG&E completed all required work for 2022. The detailed analysis, supporting documents and data, and findings for each of the vegetation management initiatives from SDG&E's WMP Update are included in Appendix A.

---

<sup>1</sup> [FindLaw.com - California Code, Public Utilities Code - PUC § 8386.3 \(updated Jan. 2023\)](https://codes.findlaw.com/ca/public-utilities-code/puc-sect-8386-3/), subd. (c)(5)(A) (https://codes.findlaw.com/ca/public-utilities-code/puc-sect-8386-3/, accessed June 11, 2024).

<sup>2</sup> [2022 Wildfire Mitigation Plan Update Guidelines \(Dec. 2021\) \(hereafter Update Guidelines\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true), attachment 2, p. 92 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true, accessed May 10, 2024).

<sup>3</sup> [SDG&E's 2022 WMP Update \(Feb. 2022\) \(hereafter SDG&E's 2022 WMP Update\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true), p. 280 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true, accessed May 10, 2024).

## 2. AUDIT FINDINGS

The audit findings for the SDG&E 2022 WMP Update vegetation management initiatives are listed in Table 1 and detailed in Appendix A.

Table 1. SDG&E 2022 SVM Audit Findings

2022 Vegetation Management Initiative	Audit Finding
7.3.5.1 Additional Efforts to Manage Community and Environmental Impacts	Performed Required Work
7.3.5.2 Detailed Inspections and Management Practices or Vegetation Clearances around Distribution Electrical Lines and Equipment	Performed Required Work
7.3.5.3 Detailed Inspections and Management Practices for Vegetation Clearances Around Transmission Electric Lines and Equipment	Performed Required Work Refer to 7.3.5.2
7.3.5.4 Emergency Response Vegetation Management due to Red Flag Warning or Other Urgent Climate conditions	Performed Required Work
7.3.5.5 Fuels Management (Including All Wood Management) and Reduction of “Slash” from Vegetation Management Activities	Performed Required Work
7.3.5.6 Improvement of Inspections	Performed Required Work Refer to 7.3.5.2
7.3.5.7 Remote Sensing Inspections of Vegetation Around Distribution Electric Lines and Equipment	Performed Required Work
7.3.5.8 Remote Sensing Inspections of Vegetation Around Transmission Electric Lines and Equipment	Performed Required Work Refer to 7.3.5.7
7.3.5.9 Other Discretionary Inspections of Vegetation Around Distribution Electric Lines and Equipment, Beyond Inspections Mandated by Rules and Regulations	Performed Required Work Refer to 7.3.5.2

7.3.5.10 Other Discretionary Inspections of Vegetation Around Transmission Electric Lines and Equipment, Beyond Inspections Mandated by Rules and Regulations	Performed Required Work Refer to 7.3.5.9
7.3.5.11 Patrol Inspections of Vegetation Around Distribution Electric Lines and Equipment	Performed Required Work Refer to 7.3.5.2
7.3.5.12 Patrol Inspections of Vegetation Around Transmission Electric Lines and Equipment	Performed Required Work Refer to 7.3.5.2
7.3.5.13 Quality Assurance / Quality Control of Vegetation Management	Performed Required Work
7.3.5.14 Recruiting and Training of Vegetation Management Personnel	Performed Required Work
7.3.5.15 Identification and Remediation of “At-Risk Species”	Performed Required Work
7.3.5.16 Removal and Remediation of Trees with Strike Potential to Electric Lines and Equipment	Performed Required Work
7.3.5.17 Substation Inspections	Performed Required Work Refer to 7.3.5.15
7.3.5.18 Substation Vegetation Management	Performed Required Work Refer to 7.3.5.15
7.3.5.19 Vegetation Management System	Performed Required Work
7.3.5.20 Vegetation Management to Achieve Clearances Around Electric Lines and Equipment	Performed Required Work
7.3.5.21 Vegetation Management Activities Post-Fire	Performed Required Work

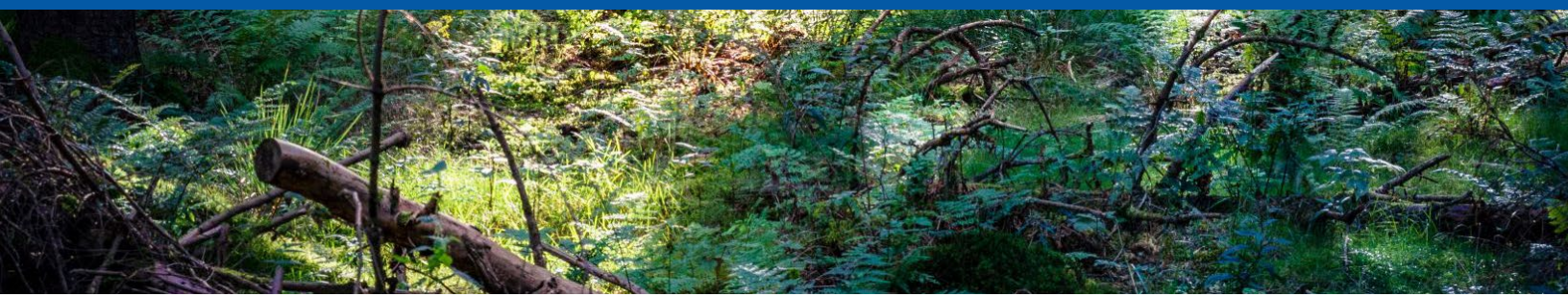
### **3. 2022 SVM AUDIT AND REPORT CONCLUSION**

Energy Safety reviewed the 21 vegetation management initiatives detailed in SG&E's 2022 WMP Update and found that SDG&E performed the work specified. Based on the analysis documented in Appendix A and Energy Safety's finding that work was performed consistent with SDG&E's 2022 WMP Update, no corrective actions are required. As a result, Energy Safety finds that SDG&E substantially complied with the substantial portion of the vegetation management requirements in its 2022 WMP Update.





# APPENDIX / ANALYSIS, SUPPORTING DOCUMENTATION AND FINDINGS





## Appendix A

Each vegetation management initiative listed in San Diego Gas & Electric Company's (SDG&E's) 2022 Wildfire Mitigation Plan (WMP) Update was analyzed by the Office of Energy Infrastructure Safety (Energy Safety) as part of this audit by identifying the WMP numeric commitment or qualitative statement and comparing that commitment or statement to the vegetation management work performed by SDG&E in 2022. SDG&E's WMP Update included 21 vegetation management initiatives. Energy Safety conducted an audit of all commitments and/or statements for each initiative; therefore, determination of whether all work was complete for each initiative was based on verification that all WMP numeric commitments or qualitative statements were completed for each initiative.

As shown in Table 1, Energy Safety determined that SDG&E performed all work identified for the 21 vegetation management initiatives in its 2022 WMP Update. Below is a summary of each WMP vegetation management initiative commitment or statement, the data or supporting documentation used to verify the commitment or statement, and the associated finding.

## A.1 Initiative 7.3.5.1 Additional Efforts to Manage Community and Environmental Impacts

The purpose of this initiative is the “Plan and execution of strategy to mitigate negative impacts from utility vegetation management to local communities and the environment, such as coordination with communities, local governments, and agencies to plan and execute vegetation management work.”<sup>4</sup>

### Statements, Supporting Information and Analysis, and Conclusions

#### Statement 1

Statement: “SDG&E also participates in Arbor Day events and engages a non-profit vendor to educate the public and school-age children on electrical awareness and safe and proper management of trees near power lines.”<sup>5</sup>

Supporting Information and Analysis: SDG&E provided an image of an online article from the Village News reporting about SDG&E’s partnership with a local elementary school. The article indicates that SDG&E hosted an Arbor Day program on May 20, 2022, at La Paloma Elementary to educate students about the “Right Tree, Right Place” value of Arbor Day.<sup>6</sup>

SDG&E also included presentation materials (PowerPoint) used during the Arbor Day program to highlight the benefits trees provide and potential consequences electrical lines can cause when located near trees.<sup>7</sup>

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

#### Statement 2

Statement: “SDG&E created a 30-minute documentary about wildfire safety efforts and advancements and community engagement, including vegetation management practices,

---

<sup>4</sup> [Update Guidelines](#), attachment 2, p. 92

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true>, accessed May 10, 2024).

<sup>5</sup> [SDG&E’s 2022 WMP Update](#), p. 280

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>6</sup> Response to DR-224, question 1; attachment “OEIS-SDGE-224\_Q1.jpg.”

<sup>7</sup> Response to DR-224, question 2; attachment “OEIS-SDGE-224\_Q2.pdf.”

that is broadcast on local TV stations and with trailers shown in strategically located movie theaters.”<sup>8</sup>

Supporting Information and Analysis: Energy Safety observed the 30-minute documentary which is available via SDG&E’s website.<sup>9</sup>

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

### Statement 3

Statement: “Pre- and post-event customer research is also conducted to obtain feedback on the quality of messaging and communication tactics that are employed.”<sup>10</sup>

Supporting Information and Analysis: An independent firm conducted SDG&E’s pre- and post-event customer research by administering two surveys via online and phone to a sample of residential and small business customers living in High Fire Threat Districts (HFTD) and Non-HFTD. The pre-event survey was completed in October 2022 with a total of 680 participants<sup>11</sup> and the post-event survey was completed in April 2023 with 900 survey participants.<sup>12</sup> The disclaimer section of the post-event survey study explains that the second, post-event survey was not conducted in 2022 because a PSPS event did not occur. However, SDG&E sponsored the second, post-event survey in April 2023 per the California Public Utilities Commission’s (CPUC’s) request.

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

### Statement 4

Statement: “SDG&E’s tree safety website is shared with numerous stakeholders and agencies.”<sup>13</sup>

---

<sup>8</sup> [SDG&E’s 2022 WMP Update](#), p. 280

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>9</sup> [SDG&E, “Everything in Our Power” Documentary \(November 22, 2019\)](#)

(<https://www.sdge.com/documentary>, accessed May 10, 2024).

<sup>10</sup> [SDG&E’s 2022 WMP Update](#), p. 280

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>11</sup> Response to DR-224, question 3; attachment “2022 SDGE PSPS Pre-season Public Education Communications ES – 22 – 115 10-25-22.El DR 009.pdf.”

<sup>12</sup> Response to DR-224, question 3; attachment “2022 Post SDG&E PSPS Public Education Communications ES – 23 – 206 06-15-23\_Final.pdf.”

<sup>13</sup> [SDG&E’s 2022 WMP Update](#), p. 280

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

Supporting Information and Analysis: SDG&E shared five different publications related to tree safety for the public,<sup>14</sup> safety around power lines,<sup>15</sup> the SDG&E Community Tree Rebate Program,<sup>16</sup> vegetation management,<sup>17</sup> and wildfire season safety.<sup>18</sup> These various publications confirm that SDG&E distributed tree safety information to various stakeholders online.

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

#### Statement 5

Statement: “SDG&E also utilizes its contract workforce of professional arborists and tree trimmers to directly engage with customers on the positive benefits of safe and proper utility line clearance operations.”<sup>19</sup>

Supporting Information and Analysis: SDG&E included scanned images of six customer approval tickets authorizing SDG&E’s contractor to remove trees from customers’ properties.<sup>20</sup> These tickets show that SDG&E contracted professional arborists and tree trimmers to assist in tree removal in 2022.

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

#### Statement 6

Statement: “Vegetation management operations are conducted with an eye toward their environmental impacts and in accordance with all applicable rules and regulations, including protocols of the wildlife agency approved Natural Communities Conservation Plan (NCCP).”<sup>21</sup>

Supporting Information and Analysis: SDG&E attached its 2019 ESA Patrol Procedures, which provides guidelines for work activities in environmentally sensitive areas within SDG&E’s service territory.<sup>22</sup> SDG&E also provided a report describing a pole brushing project within a 10-foot clearance area at ten sites in the Cleveland National Forest, in several townships, and

---

<sup>14</sup> Response to DR-224, question 4; attachment “Staying\_Safe.pdf.”

<sup>15</sup> Response to DR-224, question 4; attachment “Staying Safe.pdf.”

<sup>16</sup> Response to DR-224, question 4; attachment “FINAL\_S2270013\_Tree\_Rebate\_FS\_online.pdf.”

<sup>17</sup> Response to DR-224, question 4; attachment “VegMgmtBrochure.pdf.”

<sup>18</sup> Response to DR-224, question 4; attachment “Wildfire Season Safety.pdf.”

<sup>19</sup> [SDG&E’s 2022 WMP Update](#), p. 280

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>20</sup> Response to DR-224, question 5; attachment “OEIS-SDGE-224\_Q5\_Redacted.pdf.”

<sup>21</sup> [SDG&E’s 2022 WMP Update](#), p. 280

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>22</sup> Response to DR-224, question 6; attachment “OEIS-SDGE-224\_Q6.pdf.”



unincorporated communities.<sup>23</sup> The report describes the project’s proposed work activities, purpose, habitat and species descriptions, images and information for each proposed work site, compliance with protocols outlined by Natural Communities Conservation Plan (NCCP), and communication correspondents with various stakeholders.

Conclusion: SDG&E provided information to establish that it considered environmental impacts in performing pole brushing projects. Energy Safety found this acceptable as documentation of consideration of environmental impacts.

#### Statement 7

Statement: “Company activities are previewed by SDG&E’s Environmental Services Department to ensure habitat and species protection.”<sup>24</sup>

Supporting Information and Analysis: SDG&E provided a report describing a pole brushing project within a 10-foot clearance area at ten sites in the Cleveland National Forest, in several townships, and unincorporated communities. The report includes screenshots of email correspondence between representatives from SDG&E and the relevant California State Park discussing details of SDG&E’s project plan.<sup>25</sup> SDG&E included a second project example, which highlights the work performed in furtherance of its efforts to comply with the State Forest Practices Rules.<sup>26</sup>

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

#### Statement 8

Statement: “SDG&E also works with land agencies such as the U.S. Forest Service and California State Parks to identify and implement best practices to protect habitat and species and follows State Forest Practice Rules in the dispersal and removal of green waste associated with tree pruning and removal operations.”<sup>27</sup>

Supporting Information and Analysis: SDG&E provided a report describing a pole brushing project within a 10-foot clearance area at 10 sites in the Cleveland National Forest, in several townships, and unincorporated communities. The report includes screenshots of email correspondence between representatives from SDG&E and the relevant California State Park

---

<sup>23</sup> Response to DR-224, questions 7; attachment “OEIS-SDGE-224\_Q7 & Q8 & Q9\_Redacted.pdf.”

<sup>24</sup> [SDG&E’s 2022 WMP Update](#), p. 280

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>25</sup> Response to DR-224, questions 9; attachment “OEIS-SDGE-224\_Q7 & Q8 & Q9\_Redacted.pdf, Attachment G.”

<sup>26</sup> Response to DR-224, questions 10; attachment “OEIS-SDGE-224\_Q10\_Redacted.pdf.”

<sup>27</sup> [SDG&E’s 2022 WMP Update](#), p. 280

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

discussing details of SDG&E's project plan.<sup>28</sup> SDG&E included an environmental release for vegetation management operations at Cuyamaca Rancho State Park. The environmental release documented SDG&E's protocols and standard guidelines in furtherance of its efforts to comply with the State Forest Practice Rules in Cuyamaca Rancho State Park.<sup>29</sup>

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

#### Statement 9

Statement: "As a standard operating procedure, smaller wood debris associated with pruning operations is chipped and removed from the site. All debris is removed from watercourses to prevent flow restriction or channeling and to prevent flooding or erosion."<sup>30</sup>

Supporting Information and Analysis: SDG&E provided a sample service agreement between SDG&E and a contractor, which outlines standard operating procedures for wood debris associated with pruning operations in alignment with federal and state regulations. The contact contains a specific section outlining pruning practices and standards that align with federal and state regulations.<sup>31</sup> SDG&E also included an Excel file that lists 10 locations in which pruning activities occurred to remove debris from watercourses in 2022.

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

#### Statement 10

Statement: "As part of the "Right Tree, Right Place" initiative, Vegetation Management offers customers replacement trees as an incentive to allow abatement (removal or heavy pruning) of incompatible trees/shrubs growing near power lines, and/or pole brushing and fuels management activities."<sup>32</sup>

Supporting Information and Analysis: SDG&E stated that 175 properties participated in SDG&E's 2022 "Right Tree, Right Place" initiative.<sup>33</sup> SDG&E provided six scanned images of customer approval tickets authorizing SDG&E to remove trees from customers' properties.<sup>34</sup>

---

<sup>28</sup> Response to DR-224, questions 9; attachment "OEIS-SDGE-224\_Q7 & Q8 & Q9\_Redacted.pdf, Attachment G."

<sup>29</sup> Response to DR-224, questions 10; attachment "OEIS-SDGE-224\_Q10\_Redacted.pdf."

<sup>30</sup> [SDG&E's 2022 WMP Update](#), p. 280

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>31</sup> Response to DR-224, questions 11; attachment "OEIS-SDGE-224\_Q11\_Redacted.pdf."

<sup>32</sup> [SDG&E's 2022 WMP Update](#), p. 281

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>33</sup> Response to DR-224, question 14; attachment "SDGE Response OEIS-SDGE-DR-224.pdf". p. 12.

<sup>34</sup> Response to DR-224, question 13; attachment "OEIS-SDGE-224\_Q13\_Redacted.pdf."

For each ticket, SDG&E includes an invoice for the type and quantity of trees SDG&E replaced per customer request.

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

#### Statement 11

Statement: “SDG&E has expanded its tree planting initiatives to include planting and distributing up to 10,000 trees annually.”<sup>35</sup>

Supporting Information and Analysis: In 2022, SDG&E planted and distributed approximately 11,169 trees throughout its service territory, exceeding its goal of 10,000 planted trees. SDG&E provided an Excel file listing the tree species, partner collaboration, location, and planting month.<sup>36</sup>

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

#### Statement 12

Statement: “Grow the company sustainability initiative to provide 10,000 trees annually in collaboration with customers and local agencies.”<sup>37</sup>

Supporting Information and Analysis: As part of its sustainability initiative to plant 10,000 trees in 2022, SDG&E collaborated with more than 20 partners, including various organizations, government entities, park departments, and other business. SDG&E provided a listing of partners and the number of trees planted in collaboration with each partner.<sup>38</sup>

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

#### Statement 13

Statement: “Implement a Tree Rebate Program targeted at underserved communities to promote the planting of trees where climate equity is compromised. The program will offer

---

<sup>35</sup> [SDG&E’s 2022 WMP Update](#), p. 281

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>36</sup> Response to DR-224, question 15; attachment “OEIS-SDGE-224\_Q15.xlsx.”

<sup>37</sup> [SDG&E’s 2022 WMP Update](#), p. 281

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>38</sup> Response to DR-224, question 16; attachment “OEIS-SDGE-224\_Q16.pdf.”

each applicant a rebate in the purchase of up to 5 trees. An interactive company website will be created to educate customers about the program and how they can participate.”<sup>39</sup>

Supporting Information and Analysis: Approximately 1,057 customers participated in SDG&E’s Community Tree Rebate Program, which provided eligible customers in underserved communities the opportunity to purchase up to five utility-friendly trees and earn a rebate.<sup>40</sup> SDGE provided a document highlighting details about the Community Tree Rebate Program.<sup>41</sup> SDG&E also included a link to the Program’s website where customers can input information to determine if they are eligible to participate in the program (based on their zip code) and submit an application.<sup>42</sup>

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

#### Statement 14

Statement: “Develop and expand a customer survey regarding vegetation management operations to gather additional feedback on tree trimming operations.”<sup>43</sup>

Supporting Information and Analysis: SDG&E provided the results from the Vegetation Management Survey. The survey asked customers five total questions in either multiple choice or ranking form. Over the course of 2022, only 11 customers participated in the survey, and majority ranked their overall experience with SDG&E as excellent.<sup>44</sup>

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

#### Statement 15

Statement: “Develop internal, quarterly newsletters to engage internal business units and raise awareness of vegetation management operations.”<sup>45</sup>

---

<sup>39</sup> [SDG&E’s 2022 WMP Update](#), p. 282

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>40</sup> Response to DR-224, question 18; attachment SDGE Response OEIS-SDGE-DR-224.pdf. p. 15.

<sup>41</sup> Response to DR-224, question 17; attachment “OEIS-SDGE-224\_Q17.pdf.”

<sup>42</sup> Response to DR-224, question 17; <https://www.sdge.com/trees/community-tree-programs/community-tree-rebate-program>.

<sup>43</sup> [SDG&E’s 2022 WMP Update](#), p. 282

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>44</sup> Response to DR-224, question 19; attachment “OEIS-SDGE-224\_Q19.pdf.”

<sup>45</sup> [SDG&E’s 2022 WMP Update](#), p. 282

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

Supporting Information and Analysis: SDG&E provided screenshots of the newsletters distributed internally to engage internal business units and raise awareness of vegetation management operations. The newsletters provide updates from Q2, Q3, and Q4 on the number of trees trimmed, poles brushed, trees planted, and materials recycled as well as projects or initiatives that occurred during each quarter.<sup>46</sup>

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

## Finding

SDG&E provided information consistent with the completion of work identified in Initiative 7.3.5.1: Additional Efforts to Manage Community and Environmental Impacts.

## A.2 Initiative 7.3.5.2 Detailed Inspections and Management Practices for Vegetation Clearances Around Distribution Electrical Lines and Equipment

The purpose of this initiative is “Careful visual inspections and maintenance of vegetation around the distribution right-of-way, where individual trees are carefully examined, visually, and the condition of each rated and recorded. Describe the frequency of inspection and maintenance programs.”<sup>47</sup>

## Statements, Supporting Information and Analysis, and Conclusions

### Statement 16

Statement: “Vegetation management operations are driven by regulatory requirements and follow an annual, master schedule that includes pre-inspection, tree trimming, auditing, and pole brushing. [A]ll inventory trees are inspected to determine whether they require pruning for the annual cycle.”<sup>48</sup>

---

<sup>46</sup> Response to DR-224, question 20; attachments “VM Newsletter Q2 2022\_Redacted.pdf,” VM Newsletter Q3 2022\_Redacted.pdf” and “ VM Newsletter Q4 2022\_Redacted.pdf.”

<sup>47</sup> [Update Guidelines](#), attachment 2, p. 92

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true>, accessed May 10, 2024).

<sup>48</sup> [SDG&E’s 2022 WMP Update](#), p. 283

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).



Supporting Information and Analysis: SDG&E provided a copy of the Vegetation Management Master Schedule used in 2022.<sup>49</sup> The schedule lists start dates of pre-inspections, pre-inspection audits, routine tree trims, and post trim audits for vegetation management activities in SDG&E’s North and South service territories.

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

#### Statement 17

Statement: “During routine pre-inspection within the HFTD all trees within the strike zone of transmission and distribution lines receive a “level 2” hazard evaluation. Trees tall enough to strike overhead electric lines are assessed for trimming or removal and include identification of dead, dying, and diseased trees, live trees with a structural defect, and conditions such as wind sway and line sag.”<sup>50</sup>

Supporting Information and Analysis: SDG&E provided an Excel file listing all the trees which received a “level 2” evaluation during 2022, organized by the applicable Vegetation Management Areas (VMA) within an HFTD.<sup>51</sup> For example, of the 252 trees located within VMA 450, approximately 82 trees were identified as in need of pruning during the pre-inspections.

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

#### Statement 18

Statement: “The visual inspection includes a 360-degree hazard assessment of trees from ground level to canopy height to determine tree health, structural integrity, and environmental conditions.”<sup>52</sup>

Supporting Information and Analysis: SDG&E provided an Excel file that listed 14 hazard assessments of pre-inspected trees which were identified as “Green, Reliability Pruning” or “Dead or Dying, Reliability Removal.” and mitigated during 2022.<sup>53</sup> The file includes the date of pre-inspection, mitigation measures, and specific information about each individual tree (species, height, location, etc.).

---

<sup>49</sup> Response to DR-224, question 21; attachment “OEIS-SDGE-224\_Q21.pdf.”

<sup>50</sup> [SDG&E’s 2022 WMP Update](#), p. 283

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>51</sup> Response to DR-224, question 22; attachment “OEIS-SDGE-224\_Q22.xlsx.”

<sup>52</sup> [SDG&E’s 2022 WMP Update](#), p. 283

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>53</sup> Response to DR-224, question 23; attachment “OEIS-SDGE-224\_Q23.xlsx.”

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

#### Statement 19

Statement: “Vegetation Management performs a second annual tree inspection activity within the HFTD referred to as the “off-cycle” patrol. The scope of the off-cycle patrol is similar to the routine inspection activity; all trees within the utility strike zone are assessed to determine whether a tree could encroach within the minimum clearance requirement or otherwise poses a threat to the overhead facilities.”<sup>54</sup>

Supporting Information and Analysis: SDG&E provided an Excel file listing 1,495 trees located within Tier 2 or Tier 3 of the HFTD that were identified during “off-cycle” patrols in 2022.<sup>55</sup> Approximately 13% of the inspections identified trees in need of removal, and the remaining 87% of inspections identified trees to be trimmed or pruned.

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

#### Statement 20

Statement: “The off-cycle patrols are performed by SDG&E internal Patrollers and contractors who are ISA-Certified.”<sup>56</sup>

Supporting Information and Analysis: According to an Excel file provided by SDG&E, the off-cycle patrols were conducted in all 105 VMAs by internal Patrollers and contractors.<sup>57</sup> Nearly 46% of the off-cycle patrols were conducted by SDG&E Patrollers, and the remaining patrols were conducted by contractors. For each off-cycle patrol, SDG&E included the inspector’s name, vendor (internal or contractor), and the inspector’s International Society of Arboriculture (ISA) certification identification number.

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

#### Statement 21

---

<sup>54</sup> [SDG&E’s 2022 WMP Update](#), p. 283

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>55</sup> Response to DR-224, question 24; attachment “OEIS-SDGE-224\_Q24.xlsx.”

<sup>56</sup> [SDG&E’s 2022 WMP Update](#), p. 283

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>57</sup> Response to DR-224, question 25; attachment “OEIS-SDGE-224\_Q25\_Redacted.xlsx.”

Statement: “SDG&E performs additional annual inspections for Century plant and bamboo species due to their fast and unpredictable growth.”<sup>58</sup>

Supporting Information and Analysis: SDG&E provided several documents regarding SDG&E’s additional inspections of Century plants and bamboo species. SDG&E’s Century Plant Patrol Procedure and Bamboo Project Procedure outline SDG&E’s methodology, specifications, and reporting guidelines for inspectors to use during patrols of Century plants and bamboo species to mitigate their potential threat to SDG&E power lines.<sup>59</sup> SDG&E used a contractor to conduct the Century plant and bamboo inspections. These contractors inspected 107 VMAs, which included 7,933 total assets, for Century plant and 28 VMAs, which included 770 assets completed, for bamboo patrol.<sup>60</sup>

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

#### Statement 22

Statement: “Explore the use of the WiNGS-Planning risk model to evaluate the effectiveness of vegetation management operations risk models to support future prioritization and implementation of tree trimming.”<sup>61</sup>

Supporting Information and Analysis: SDG&E provided documentation explaining that based on its evaluation of the WiNGS-Planning risk model, the risk model is “not the best approach for identifying the trees or vegetation management areas that need to be prioritized for routine or non-routine inspections or tree trims, nor is it the best approach for informing relative risk for trees at the asset or circuit section.”<sup>62</sup> SDG&E concluded that the independent model developed by Logic 20/20 is the “superior approach to determine the prioritization and implementation of tree trimming.”<sup>63</sup>

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

#### Statement 23

---

<sup>58</sup> [SDG&E’s 2022 WMP Update](#), p. 284

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>59</sup> Response to DR-224, question 26; attachments “Century Plant Patrol Procedure 2022.pdf” and “Bamboo Patrol Procedure 2022.pdf.”

<sup>60</sup> Response to DR-224, question 26; attachments “Century Plant Patrol Report 2022 Final\_Redacted.pdf” and “Winter Bamboo Patrol Reporting 2022 Final\_Redacted.pdf.”

<sup>61</sup> SDG&E’s 2022 WMP, p. 286.

<sup>62</sup> Response to DR-224, question 27; attachment “OEIS-SDGE-224\_Q27.pdf. p. 3.”

<sup>63</sup> Response to DR-224, question 27; attachment “OEIS-SDGE-224\_Q27.pdf. p. 4.”

Statement: “Modify the annual schedule for off-cycle inspections within the HFTD to occur closer to the beginning of the region’s peak fire season (September), while allowing enough time to complete any backlog items.”<sup>64</sup>

Supporting Information and Analysis: SDG&E attached both the 2021 and 2022 off-cycle patrol schedules for the 105 total VMAs located within the HFTD.<sup>65</sup> In 2021, SDG&E conducted about 25% of the off-cycle patrols in the three months leading up to the beginning of fire season (September). SDG&E’s modified 2022 schedule indicates that SDG&E conducted nearly 63% of its off-cycle patrols between June and August. Thus, SDG&E improved its off-cycle patrol schedule within the HFTD to occur closer to the beginning of the region’s peak fire season in 2022 as compared to 2021.

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

#### Statement 24

Statement: “Continue to collaborate on multi-year vegetation management enhanced clearance study with the joint IOUs.”<sup>66</sup>

Supporting Information and Analysis: SDG&E provided a link to its 2023-2025 Wildfire Mitigation Plan, which provides a progress update on SDG&E’s collaboration with other Investor-Owned Utilities (IOU) on the enhanced clearance study. SDG&E, Pacific Gas & Electric Company (PG&E), and Southern California Edison Company (SCE) initiated the study in 2021 to, “(1) standardize the data collection process for the cross-utility database of tree-caused risk events, (2) determine where and in what form the database will exist, [and] (3) examine, to the best of their ability, whether the correlation between enhanced clearance and the lower number of tree-caused outage events may be attributable to other factors beyond clearances, such as the management of hazard trees and the installation of covered conductor.”<sup>67</sup> As part of its continued collaboration, the joint IOUs met bi-weekly throughout 2022 with Energy Safety to address progress on the study and select a third-party vendor to assist with the data analysis process.

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

---

<sup>64</sup> [SDG&E’s 2022 WMP Update](#), p. 286

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>65</sup> Response to DR-224, question 28; attachment “OEIS-SDGE-224\_Q28.xlsx.”

<sup>66</sup> [SDG&E’s 2022 WMP Update](#), p. 286

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>67</sup> [SDG&E’s 2023-2025 WMP \(published Oct. 2023\)](#), Appendix C, “Enhanced Clearance Joint Response”, p. 931 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true>).

**Statement 25**

Statement: “Further integrate VRI into inspection activities for the HFTD.”<sup>68</sup>

Supporting Information and Analysis: SDG&E explains that its Vegetation Risk Index (VRI) is, “not sufficient for vegetation management operational decision-making as it does not categorize circuits and transmission lines based on tree species, tree height, tree count, and historical vegetation-related outages.”<sup>69</sup> Instead, SDG&E is working on implementing a new model that is superior in assessing vegetation contact risk for its entire service territory and operational use in vegetation management operations. Although SDG&E did not further integrate its VRI for inspection activities, SDG&E explains that it is exploring alternative approaches.

Conclusion: Energy Safety considers SDG&E's decision not to implement the VRI reasonable because the use of the VRI would not achieve the program objective of assessing contact risk and SDG&E is developing a more effective model to accomplish this program objective.

**Statement 26**

Statement: “Engage third-party review of inspection activities to gauge the effectiveness and efficiency of scheduling.”<sup>70</sup>

Supporting Information and Analysis: SDG&E engaged with a third-party vendor<sup>71</sup> in 2022 to explore modifying SDG&E's annual off-cycle HFTD patrol schedule. SDG&E provided a copy of the vendor's report, which evaluates the technology, processes, models, and inspection schedule used in SDG&E's vegetation management activities during off-cycle HFTD patrols.<sup>72</sup> The study prioritized and ranked higher risk VMAs so that they were inspected closer to the onset of peak fire conditions while not overlapping with other vegetation management activities. VMAs were ranked based on a machine learning model that predicted trees that were likely to have the following three conditions: memos, reliability trees, and tree-related outages.<sup>73</sup> The vendor provided SDG&E a risk ranking of the VMAs as well as recommendations for modifying the initial off-cycle VMA patrol scheduled; SDG&E

---

<sup>68</sup> [SDG&E's 2022 WMP Update](#), p. 286

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>69</sup> Response to DR-224, question 30; attachment “OEIS-SDGE-224\_Q30.pdf. p. 3.”

<sup>70</sup> [SDG&E's 2022 WMP Update](#), p. 286

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>71</sup> Response to DR-230, question 89; attachment “SDGE Response OEIS-SDGE-DR-230.pdf.”

<sup>72</sup> Response to DR-224, question 31; attachment “OEIS-SDGE-224\_Q31.pdf.”

<sup>73</sup> Memos are trees that are observed to have either a non-compliant clearance or a priority condition; reliability trees are those with a hazardous defect or condition.



implemented a revised, risk-based off-cycle patrol schedule based on these recommendations in 2022.<sup>74</sup>

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

#### Statement 27

Statement: “Continue additional inspection activities throughout 2022 as they have proven to be extremely effective in mitigating the risk of outage, ignition, and wildfire.”<sup>75</sup>

Supporting Information and Analysis: SDG&E provided Century plant and bamboo plant patrol procedures and reports of patrols completed in 2022.<sup>76</sup> SDG&E’s procedures require Century plants and bamboo species to be patrolled multiple times in a single annual cycle to assess their potential threat to SDG&E’s electrical facilities and power lines. SDG&E used a contractor to patrol all VMAs to perform Century plant and bamboo species pruning and eradication.<sup>77</sup>

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

#### Statement 28

Statement: “Proactively manage Century plants within transmission corridors through biological means (herbicide use).”<sup>78</sup>

Supporting Information and Analysis: In accordance with SDG&E’s Century Plant Patrol Procedure,<sup>79</sup> SDG&E’s contracted vendor used two types of herbicides to treat approximately 610 Century plant units in 45 total VMAs between March and June of 2022.<sup>80</sup> SDG&E also included copies of the doorhangers used to notify customers of Century plant removal on or near their property through use of chemical treatment (herbicides).<sup>81</sup>

---

<sup>74</sup> Response to DR-230, question 90; attachment “SDGE Response OEIS-SDGE-DR-230.pdf.”

<sup>75</sup> [SDG&E’s 2022 WMP Update](#), p. 286

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>76</sup> Response to DR-224, question 32; attachments “Century Plant Patrol Procedure 2022.pdf” and “Bamboo Patrol Procedure 2022.pdf.”

<sup>77</sup> Response to DR-224, question 32; attachments “Century Plant Patrol Report 2022 Final\_Redacted.pdf” and “Winter Bamboo Patrol Reporting 2022 Final\_Redacted.pdf.”

<sup>78</sup> [SDG&E’s 2022 WMP Update](#), p. 286

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>79</sup> Response to DR-224, question 33; attachment “Century Plant Patrol Report 2022 Final.pdf.”

<sup>80</sup> Response to DR-224, question 33; attachment “Century Plant Eradication 2022.pdf.”

<sup>81</sup> Response to DR-224, question 33; attachment “SDG&E Century Plant Doorhanger.pdf.”

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

## Finding

SDG&E provided information consistent with the completion of work identified in Initiative 7.3.5.2: Detailed Inspections of Vegetation Around Management Practices for Vegetation Clearances Around Distribution Electric Lines and Equipment.

### A.3 Initiative 7.3.5.3 Detailed Inspections and Management Practices for Vegetation Clearances Around Transmission Electric Lines and Equipment

The purpose of this initiative is the “Careful visual inspections and maintenance of vegetation around the transmission right-of-way, where individual trees are carefully examined, visually, and the condition of each rated and recorded. Describe the frequency of inspection and maintenance programs.”<sup>82</sup>

## Statements, Supporting Information and Analysis, and Conclusions

SDG&E’s 2022 WMP update, Initiative 7.3.5.3 Detailed Inspections and Management Practices for Vegetation Clearances Around Transmission Electric Lines and Equipment, directs readers to Initiative 7.3.5.2. Therefore, Energy Safety did not conduct a separate analysis of the work performed for this initiative.

## Finding

See the finding for Initiative 7.3.5.2.

---

<sup>82</sup> [Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true), attachment 2, p. 92 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true, accessed May 10, 2024).

## A.4 Initiative 7.3.5.4 Emergency Response Vegetation Management due to Red Flag Warning or Other Urgent Climate Conditions

The purpose of this initiative is the “Plan and execution of vegetation management activities, such as trimming or removal, executed based upon and in advance of forecast weather conditions that indicate high fire threat in terms of ignition probability and wildfire consequence.”<sup>83</sup>

### Statements, Supporting Information and Analysis, and Conclusions

#### Statement 29

Statement: “In advance of forecasted RFWs or Santa Ana conditions, SDG&E will determine if additional vegetation management patrols are warranted to assess tree conditions. Vegetation Management coordinates with FD&CA to determine if and where this activity should occur.”<sup>84</sup>

Supporting Information and Analysis: SDG&E explained that it experienced only one National Weather Service (NWS) declared Red Flag Warning in 2022.<sup>85</sup> Since this event was limited to SDG&E’s Orange County Operations & Management District, it did not necessitate additional vegetation management patrols nor services from the Fire Sciences & Climate Adaption (FS&CA) Department.

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

#### Statement 30

Statement: “Vegetation Management implements prioritization protocols when a tree is observed to be out of compliance with the minimum clearance requirement or if the tree poses an imminent threat to the power lines. A tree in this condition is considered a “Memo.”

---

<sup>83</sup> [Update Guidelines](#), attachment 2, p. 92

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true>, accessed May 10, 2024).

<sup>84</sup> [SDG&E’s 2022 WMP Update](#), p. 287

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>85</sup> Response to DR-244, question 34; attachment “OEIS-SDGE-DR-224.pdf. p. 31.”

When such a condition is identified, tree trimming may be performed the same day or scheduled within a few weeks depending on the severity and urgency of the condition.”<sup>86</sup>

Supporting Information and Analysis: SDG&E provided a section from a procedure outlining the protocol for when a tree is observed to be non-compliant or poses an imminent threat to the power lines.<sup>87</sup> Non-compliant or threatening trees are identified as “Memos” and classified as either ‘Same Day/Next Day’ or ‘Group’ based on the level of priority for pruning or removal. The procedure provides criteria for how to classify a Memo’s priority type based on voltage and clearance factors and outlines the protocol when issuing a memo.

SDG&E included an Excel file with a sample of trees identified as Memos during 2022.<sup>88</sup> Energy Safety compared the Memos’ identification date to its date of mitigation to determine their classification of either ‘Same Day/Next Day’ or ‘Group.’ Approximately fourteen Memos were classified as ‘Same Day/Next Day’ and removed accordingly while the remaining nine Memos were classified as ‘Group’ and pruned within about a week of identification. Energy Safety determined that SDG&E treated Memos in accordance with its prioritization protocol.

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

### Statement 31

Statement: “As a forecasted event approaches, tree crew resources are scheduled and coordinated for standby operations where requested. These crews are staged to be utilized for storm response and restoration activities.”<sup>89</sup>

Supporting Information and Analysis: SDG&E provided the dates in which tree crews were utilized in 2022 for storm response or restoration activities and included the corresponding ticketing request form and tree trimming report for each instance.<sup>90</sup> Tree crews were on standby or callout in response to Tropical Storm Kay, which resulted in heavy rain and gusty or damaging winds. These records indicate that SDG&E proactively coordinated tree crews for standby operations for storm response or restoration activities.

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

---

<sup>86</sup> [SDG&E’s 2022 WMP Update](#), p. 287

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>87</sup> Response to DR-224, question 35; attachment “OEIS-SDGE-224\_Q35.pdf.”

<sup>88</sup> Response to DR-224, question 36; attachment “OEIS-SDGE-224\_Q26.xlsx.”

<sup>89</sup> [SDG&E’s 2022 WMP Update](#), p. 287

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>90</sup> Response to DR-224, question 37; attachment “OEIS-SDGE-224\_Q37\_Redacted.pdf.”

**Statement 32**

Statement: “During elevated or extreme weather events, Vegetation Management contractors are kept informed of conditions in advance, allowing them time to relocate crews into safe work areas or to cease operations if required. In instances of emergency tree trimming during elevated fire conditions, additional fire equipment or support from contracted professional fire resources may be utilized.”<sup>91</sup>

Supporting Information and Analysis: SDG&E explained that there were no instances that warranted the use of emergency trimming during elevated fire conditions in 2022, and thus, no tree crews were dispatched.<sup>92</sup> SDG&E noted that stand-by tree crews were utilized for winter storm response, which is substantiated in the analysis above.

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

**Finding**

SDG&E provided information consistent with the completion of work identified in Initiative 7.3.5.4: Emergency Response Vegetation Management due to Red Flag Warning or Other Urgent Climate Conditions.

## **A.5 Initiative 7.3.5.5 Fuel Management (including all wood management) and Reduction of “slash” from Vegetation Management Activities**

The purpose of this initiative is the “Plan and execution of fuel management activities in proximity to potential sources of ignition. This includes pole clearing per PRC 4292 and reduction or adjustments of live fuel (based on species or otherwise) and of dead fuel, including all downed wood and “slash” generated from vegetation management activities.”<sup>93</sup>

### **Statements, Supporting Information and Analysis, and Conclusions**

---

<sup>91</sup> [SDG&E’s 2022 WMP Update](#), p. 287

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>92</sup> Response to DR-244, question 38; attachment “OEIS-SDGE-DR-224.pdf. p. 34.”

<sup>93</sup> [Update Guidelines](#), attachment 2, p. 92

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true>, accessed May 10, 2024).



**Statement 33**

Statement: “SDG&E-sponsored funding for memoranda of understandings (MOUs) and grants to external partners for the purpose of reducing fuels near electrical infrastructure and to enhance community wildfire prevention and safety. The Fuels Reduction MOU & Grant activity targets electric ROWs, evacuation routes, and community defensible space areas to reduce the risk of a fire of consequence and to strengthen community resiliency. Fuel reduction treatments can slow fire spread, assist in firefighting efforts, and reduce the impact of fires on a community. The Fuels Reduction MOU & Grant activity is a partnership with community organizations to help reduce the risk of catastrophic fire in their respective communities associated with electric infrastructure. The fuel reduction treatments follow industry best practice and target utility ROWs in high fire danger areas.”<sup>94</sup>

Supporting Information and Analysis: SDG&E sponsored the following communities and organizations to support wildfire prevention and safety events: Fire Safe Council (FSC) San Diego, Oak Grove (FSC), San Diego County Fire, and the Viejas Reservation.<sup>95</sup> SDG&E’s sponsorship for memoranda of understandings (MOUs) and grants enabled these organizations to host community events, educational workshops, webinars, and various programs. The No-Cost Chipping and Defensible Space Assistance Program (DSAP), sponsored by SDG&E in partnership with the FSCs, assisted over 100 at-risk homeowners in Q1, Q2, and Q4 in 2022 with the human and capital resources to maintain defensible space around their homes.<sup>96</sup> SDG&E’s sponsorship also supported removal of fuel along distribution line rights of ways in Palomar Mountain State Park and Santa Ysabel Lipay Nation tribal lands.

Conclusion: SDG&E provided information consistent with the completion of work identified in these statements.

**Statement 34**

Statement: “Continue to assess cost/benefit as well as research alternatives such as use of fire retardants.”<sup>97</sup>

Supporting Information and Analysis: SDG&E provided a copy of a proposal, in collaboration with PG&E and SCE, requesting Cal Poly Wildland-Urban Interface (WUI) Fire Institute study the effectiveness of fire-retardant products and their potential ecological effect and risk to

---

<sup>94</sup> [SDG&E’s 2022 WMP Update](#), pp. 288-298

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>95</sup> Response to DR-224, question 40; attachment “OEIS-SDGE-224\_Q40.pdf.”

<sup>96</sup> Response to DR-224, question 39; attachments “OEIS-SDGE-224\_Q39\_FuelsReportQuarter1.pdf,” “OEIS-SDGE-224\_Q39\_FuelsReportQuarter2.pdf,” and “OEIS-SDGE-224\_Q39\_FuelsReportQuarter3.pdf.”

<sup>97</sup> [SDG&E’s 2022 WMP Update](#), p. 290

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

human health.<sup>98</sup> SDG&E also participated in a roadside fire-retardant application in cooperation with San Diego County Fire (SDCF) in 2022. As part of this application, SDG&E provided funding to treat select roadways with fire retardant. SDCF is currently in the process of analyzing the 2022 roadside ignition data to determine the efficacy of the treatment. The WUI proposal, as well as SDG&E's partnership with SDCF in a roadside fire-retardant application, indicate SDG&E's ongoing assessment of fire retardants.

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

### Statement 35

Statement: "Engage third party to study the methodology and effectiveness of the fuels treatment activity."<sup>99</sup>

Supporting Information and Analysis: SDG&E contracted with researchers through Insight Global to evaluate risk-event methodology and provide recommendations for future pole clearance activities.<sup>100</sup> As part of this study, researchers mapped the heat risk cell distribution throughout SDG&E's service area, which informs SDG&E on the effectiveness of its fuels treatment activity.

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

### Statement 36

Statement: "Provide customer engagement and awareness earlier in the year to streamline authorization to perform."<sup>101</sup>

Supporting Information and Analysis: SDG&E described its public outreach efforts in 2022 regarding its Wildfire Fuels Modification (WFM) Program.<sup>102</sup> For the 675 potential work areas selected for the WFM Program, SDG&E attempted to contact and receive permission from more than 950 individual landowners. SDG&E began contacting landowners in early July 2022 via mail, which included information on the WFM Program, permission form, invitation to virtual SDG&E -led open house, FAQ form, and a stamped return envelope. If landowners had not responded, SDG&E followed up with doorhangers between July 5 and 15. SDG&E also

---

<sup>98</sup> Response to DR-224, question 41; attachment "Cal Poly WUI – Proactive Use of Fire Retardants – WUI Submission.pdf."

<sup>99</sup> [SDG&E's 2022 WMP Update](#), p. 290

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>100</sup> Response to DR-224, question 42; attachment "OEIS-SDGE-224\_Q42.pdf."

<sup>101</sup> [SDG&E's 2022 WMP Update](#), p. 290

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>102</sup> Response to DR-224, question 43; attachment "OEIS-SDGE-224\_Q43Public Outreach\_Details.pdf."

hosted two virtual open houses on July 14 and 21 to inform landowners and allow space for questions and concerns. SDG&E personnel attempted to contact nonresponsive landowners again in August and November. Nearly 60% of landowners granted SDG&E permission to conduct vegetation management activities on their properties, resulting in approximately 386 poles treated. In its data request response, SDG&E also included images of the doorhangers<sup>103</sup> and the virtual open house invitation<sup>104</sup> distributed to landowners in the potential work areas.

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

### Statement 37

Statement: “Expand the acreage to be abated by goat grazing in sections of the Transmission corridors within Chula Vista, Oceanside, Escondido and Harmony Grove.”<sup>105</sup>

Supporting Information and Analysis: SDG&E expanded the use of goat grazing beyond the Chula Vista Transmission corridor in 2022 to include SDG&E’s Oceanside, Escondido, and Harmony Grove service areas.<sup>106</sup> SDG&E provided environmental release forms prescribing the use of goat grazing within Chula Vista, Escondido (including Harmony Grove), and Oceanside Transmission corridors in 2022.<sup>107</sup> SDG&E’s Environmental Services Departments performed environmental reviews to ensure that goat grazing did not negatively impact sensitive and protected species in the selected areas. SDG&E also included images of goats grazing in these transmission corridors and coordinating maps of the areas.<sup>108</sup>

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

### Statement 38

---

<sup>103</sup> Response to DR-224, question 43; attachments “Doorhanger\_Front\_062322.jpg” and Doorhanger\_Back\_062322.jpg

<sup>104</sup> Response to DR-224, question 43; attachments “Virtual Open House\_Front\_062322.jpg” and Virtual Open House\_Back\_062322.jpg

<sup>105</sup> [SDG&E’s 2022 WMP Update](#), p. 290

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>106</sup> Response to DR-230, question 92; attachment “SDGE Response OEIS-SDGE-DR-230.pdf.”

<sup>107</sup> Response to DR-230, question 91; attachments “51208.01 Env Release 01282022.pdf” and “51210 Env Release 01282022.pdf.”

<sup>108</sup> Response to DR-230, question 91; attachment “Goat\_Grazing\_Photos\_Mapping.pdf.”

Statement: “Treatment of wildland fuels in proximity to electric facilities will be completed.”<sup>109</sup>

Supporting Information and Analysis: SDG&E provided an external report that discusses the fuels modification treatment SDG&E conducted in 2022 through its WFP Program in collaboration with the Pala Band of Mission Indians. The work crews treated approximately 30 poles from August to November to reduce the risk of “wildfire ignitions in High Fire Risk Areas and to protect infrastructure by reducing the intensity of wildfires that may occur outside right of way.”<sup>110</sup> The report lists the location of the 30 poles treated and includes before and after treatment images, lessons learned, and details on the project’s completion. SDG&E also provided its internal report overviewing its WFM Program in 2022 including SDG&E’s methodology, site selection, public outreach process, fuels modification treatment, and the various treatment sites.<sup>111</sup>

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

## Finding

SDG&E provided information consistent with the completion of work identified in Initiative 7.3.5.5: Fuels Management (including all wood management) and Reduction of “slash” from Vegetation Management Activities.

## A.6 Initiative 7.3.5.6 Improvement of Inspections

The purpose of this initiative is “Identifying and addressing deficiencies in inspection protocols and implementation by improving training and the evaluation of inspectors.”<sup>112</sup>

## Statements, Supporting Information and Analysis, and Conclusions

---

<sup>109</sup> [SDG&E’s 2022 WMP Update](#), p. 290

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>110</sup> Response to DR-224, question 45; attachment “Pala 30 Pole Fuels Modification Project\_Report\_Invoice\_12\_15\_22.pdf, p. 1.”

<sup>111</sup> Response to DR-224, question 45; attachment “WFM\_2022\_CompReport\_FINAL.pdf.”

<sup>112</sup> [Update Guidelines](#), attachment 2, p. 93

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true>, accessed May 10, 2024).

SDG&E's 2022 WMP Update, Initiative 7.3.5.6 Improvement of Inspections, directs readers to Initiative 7.3.5.2. Therefore, Energy Safety did not conduct a separate analysis of the work performed for this initiative.



## Finding

See the finding for Initiative 7.3.5.2.

### A.7 Initiative 7.3.5.7 Remote Sensing Inspections of Vegetation Around Distribution Electric Lines and Equipment

The purpose of this initiative is to perform “Inspections of right-of-way using remote sensing methods such as LiDAR, satellite imagery, and UAV.”<sup>113</sup>

## Statements, Supporting Information and Analysis, and Conclusions

### Statement 39

Statement: “Vegetation Management utilizes LiDAR in its vegetation inspection activities primarily within the HFTD and transmission corridors. Satellite technology is used in some of the HFTD areas in comparison to LiDAR to determine the relative benefits of both.”

Supporting Information and Analysis: According to SDG&E, LiDAR data was captured and processed on all circuits within the HFTD in 2021 and 2022.<sup>114</sup> SDG&E provided a scale map of SDG&E’s entire service territory highlighting all HFTD circuits that were flown with LiDAR; a smaller scale example image of one HFTD circuit that was flown; a screenshot of SDG&E’s dashboard of total flight miles; and a table of total overhead HFTD circuit line miles. SDG&E ultimately conducted LiDAR on 3,437 overhead miles in the HFTD in Tier-2 and Tier-3.<sup>115</sup>

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

### Statement 40

Statement: “With the recent LiDAR Foundation release, SDG&E and its contractors will develop a centralized enterprise repository where LiDAR data and associated files will be uploaded, stored, and accessed. This capability sets the stage for running analytics and

---

<sup>113</sup> [Update Guidelines](#), attachment 2, p. 93

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true>, accessed May 10, 2024).

<sup>114</sup> Response to DR-224, question 46; attachment “OEIS-SDGE-DR-224,” p. 41.

<sup>115</sup> Response to DR-230, question 93; attachment “OEIS-SDGE-230\_93.”

Artificial Intelligence on the LiDAR data.”<sup>116</sup>

Supporting Information and Analysis: SDG&E provided screenshots of its centralized enterprise repository where LiDAR data is uploaded, stored, and accessed.<sup>117</sup> When a file is uploaded and accessed, the centralized enterprise repository displays information such as the file’s data owner, line type, circuit, region, and capture date.

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

#### Statement 41

Statement: “Engage with other IOUs on their use and integration of remote sensing technologies within their vegetation management programs.”<sup>118</sup>

Supporting Information and Analysis: SDG&E provided an agenda from a joint meeting between SDG&E, Energy Safety, SCE, and PG&E that occurred on July 28, 2022.<sup>119</sup> Based on the agenda, the IOUs discussed their similarities and differences related to data collection and identification of planned/actual trim work through GIS information.

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

#### Statement 42

Statement: “Engagement with satellite vendors to determine current status of technology, and capabilities for augmentation and integration with vegetation management operations.”<sup>120</sup>

Supporting Information and Analysis: SDG&E provided a presentation regarding enterprise satellite technology.<sup>121</sup> The presentation explored the benefits, capabilities, and costs of leveraging enterprise satellite technology, particularly for vegetation management and wildfire mitigation activities.

---

<sup>116</sup> [SDG&E’s 2022 WMP Update](#), p. 292

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>117</sup> Response to DR-224, question 48; attachment “OEIS-SDGE-224\_Q48.pdf.”

<sup>118</sup> [SDG&E’s 2022 WMP Update](#), p. 292

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>119</sup> Response to DR-224, question 49; attachment “OEIS-SDGE-224\_Q49\_Redacted.pdf.”

<sup>120</sup> [SDG&E’s 2022 WMP Update](#), p. 292

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>121</sup> Response to DR-224, question 50; attachment “Enterprise Satellite.pdf.”

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

## Finding

SDG&E provided information consistent with the completion of work identified in Initiative 7.3.5.7: Remote Sensing Inspections of Vegetation Around Distribution Electric Lines and Equipment.

## A.8 Initiative 7.3.5.8 Remote Sensing Inspections of Vegetation Around Transmission Electric Lines and Equipment

The purpose of this initiative is “to describe the electrical corporation’s methods for inspecting transmission rights-of-way using LiDAR.”<sup>122</sup>

## Statements, Supporting Information and Analysis, and Conclusions

SDG&E’s 2022 WMP Update, Initiative 7.3.5.8 Remote Sensing Inspections of Vegetation Around Transmission Electric Lines and Equipment, directs readers to Initiative 7.3.5.7. Therefore, Energy Safety did not conduct a separate analysis of the work performed for this initiative.

## Finding

See the finding for Initiative 7.3.5.7.

---

<sup>122</sup> [Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true), attachment 2, p. 93 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true, accessed May 10, 2024).

## **A.9 Initiative 7.3.5.9 Other Discretionary Inspection of Vegetation Around Distribution Electric Lines and Equipment, Beyond Inspections Mandated by Rules and Regulations**

The purpose of this initiative is “inspecting the distribution rights-of-ways and the adjacent vegetation that may be hazardous, which goes beyond the minimum standards in rules and regulations.”<sup>123</sup>

### **Statements, Supporting Information and Analysis, and Conclusions**

SDG&E’s 2022 WMP Update, Initiative 7.3.5.9 Other Discretionary Inspections of Vegetation Around Distribution Electric Lines and Equipment, Beyond Inspections Mandated by Rules and Regulations, beyond inspections mandated by rules and regulations, directs readers to Initiative 7.3.5.2. Therefore, Energy Safety did not conduct a separate analysis of the work performed for this initiative.

### **Finding**

See the finding for Initiative 7.3.5.2.

## **A.10 Initiative 7.3.5.10 Other Discretionary Inspection of Vegetation Around Transmission Electric Lines and Equipment, Beyond Inspections Mandated by Rules and Regulations**

The purpose of this initiative is “inspecting transmission rights-of-way to identify vegetation hazards.”<sup>124</sup>

---

<sup>123</sup> [Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true), attachment 2, p. 93

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true>, accessed May 10, 2024).

<sup>124</sup> [Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true), attachment 2, p. 93

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true>, accessed May 10, 2024).

## Statements, Supporting Information and Analysis, and Conclusions

SDG&E's 2022 WMP Update, Initiative 7.3.5.10 Other Discretionary Inspections of Vegetation Around Transmission Electric Lines and Equipment, Beyond Inspections Mandated by Rules and Regulations, directs readers to Initiative 7.3.5.9. Therefore, Energy Safety did not conduct a separate analysis of the work performed for this initiative.

### Finding

See the finding for Initiative 7.3.5.9.

## A.11 Initiative 7.3.5.11 Patrol Inspections of Vegetation Around Distribution Electric Lines and Equipment

The purpose of this initiative is “to inspect distribution rights-of-way to identify obvious [vegetation] hazards.”<sup>125</sup>

## Statements, Supporting Information and Analysis, and Conclusions

SDG&E's 2022 WMP Update, Initiative 7.3.5.9 Patrol Inspections of Vegetation Around Distribution Electric Lines and Equipment, directs readers to Initiative 7.3.5.2. Therefore, Energy Safety did not conduct a separate analysis of the work performed for this initiative.

### Finding

See the finding for Initiative 7.3.5.2.

---

<sup>125</sup> [Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true), attachment 2, p. 93 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true, accessed May 10, 2024).



## A.12 Initiative 7.3.5.12 Patrol Inspections of Vegetation Around Transmission Electric Lines and Equipment

The purpose of this initiative is “to inspect transmission rights-of-way to identify “obvious [vegetation] hazards.”<sup>126</sup>

### Statements, Supporting Information and Analysis, and Conclusions

SDG&E’s 2022 WMP Update, Initiative 7.3.5.12 Patrol Inspections of Vegetation Around Transmission Electric Lines and Equipment, directs readers to Initiative 7.3.5.2. Therefore, Energy Safety did not conduct a separate analysis of the work performed for this initiative.

### Finding

See the finding for Initiative 7.3.5.2.

## A.13 Initiative 7.3.5.13 Quality Assurance / Quality Control of Vegetation Management

The purpose of this initiative is the “Establishment and function of audit process to manage and oversee the work completed by employees or contractors, including packaging QA/QC information for input to decision-making and workforce management processes. This includes identification of the percentage of vegetation inspections that are audited annually, as a program target in Table 5.3-1.”<sup>127</sup>

### Statements, Supporting Information and Analysis, and Conclusions

#### Statement 43

Statement: “SDG&E utilizes a third-party contractor to perform quality assurance audits of vegetation management activities to measure work quality, contractual adherence,

---

<sup>126</sup> [Update Guidelines](#), attachment 2, p. 93

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true>, accessed May 10, 2024).

<sup>127</sup> [Update Guidelines](#), attachment 2, p. 93-94

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true>, accessed May 10, 2024).

compliance, and to determine the effectiveness of each component of the program. These audits include a statistical analysis of a representative sample of all completed work. Auditing is performed by ISA Certified Arborists.”<sup>128</sup>

Supporting Information and Analysis: SDG&E provided four examples in which SDG&E contracted with a third-party contractor to conduct audits of vegetation management activities in 2022. Energy Safety reviewed audit summaries from SDG&E’s Vegetation Management System and observed SDG&E used a contractor for pre-inspection audits and tree trim audits.<sup>129</sup> SDG&E provided the ISA-Certification numbers and dates in which these audits were completed.<sup>130</sup>

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

#### Statement 44

Statement: “SDG&E expanded its audit program by integrating “level 2” hazard tree assessments during the post-trim audit. These assessments are performed by the Certified Arborists performing the audit.”<sup>131</sup>

Supporting Information and Analysis: SDG&E provided its Vegetation Management Highest Fire Threat District (HFTD) Tree Inspection Scope of Work (updated in April 2022), which informs contractors to perform off-cycle patrol inspections for both Tier 2 and Tier 3 trees in the HFTD.”<sup>132</sup> An independent auditor conducted the off-cycle tree inspections in approximately 26 VMAs.<sup>133</sup>

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

#### Statement 45

Statement: “SDG&E works with the audit contractor to determine the scope, frequency, and number of resources needed to complete all audit activities. During the post-trim audit, the Certified Arborist also performs an inspection of all power lines within the VMA for any trees

---

<sup>128</sup> [SDG&E’s 2022 WMP Update](#), p. 293

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>129</sup> Response to DR-224, question 51; attachments “42.674.RA.6-14-22\_Redacted.pdf,” “42.512.RA.6-14-22\_Redacted.pdf,” “41.468.PI.5-25-22\_Redacted.pdf,” and “41.468.PI.5-25-22\_Redacted.pdf.”

<sup>130</sup> Response to DR-244, question 51; attachment “OEIS-SDGE-DR-224.pdf.” p. 45.

<sup>131</sup> [SD&E’s 2022 WMP Update](#), p. 293

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>132</sup> Response to DR-224, question 52; attachment “OEIS-SDGE-224\_Q52.pdf.”

<sup>133</sup> Response to DR-224, question 25; attachment “OEIS-SDGE-224\_Q25\_Redacted.xlsx.”

that will not remain compliant with applicable regulatory requirements for the duration of the annual cycle. Results are reviewed to determine if any additional work is required.”<sup>134</sup>

Supporting Information and Analysis: SDG&E provided numerous agendas discussing scope, frequency, and audit activities from meetings between SDG&E and its audit contractor throughout 2022.<sup>135</sup> SDG&E also provided an example of a failed audit within a VMA in March 2022 that resulted in additional tree trimming by the vendor.<sup>136</sup> The corresponding documents indicated that in most cases, the failed trees did not pass the audit due to insufficient clearances.

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

#### Statement 46

Statement: “QA/QC activities are completed throughout the service territory. Within the HFTD, SDG&E aims to perform a 100 percent audit of tree trimming and removal work associated with the off-cycle secondary inspections within the HFTD.”<sup>137</sup>

Supporting Information and Analysis: SDG&E provided an Excel file with data pertaining to audits for off-cycle secondary inspections within the HFTD.<sup>138</sup> SDG&E completed audits of tree trimming and removal work for approximately 92% of the off-cycle HFTD work in 2022. SDG&E indicated that some audits may not be possible due to outside factors such as restricted location or duplicative inspections.<sup>139</sup> SDG&E included five examples of post-trim audit summaries which described locations where SDG&E could not perform post-trim audit activities in 2022 due to customer refusal, exception status, or access issues.<sup>140</sup>

Conclusion: Energy Safety considers the tree trimming and removal work, which was fully completed by SDG&E, directly relational to risk reduction and considers the QA/QC checks of that work to be secondarily related to risk reduction. Energy Safety determined that although 8% of the QA/QC work was not completed by SDG&E this did not affect the overarching goal of risk reduction. As a result, Energy Safety does not require additional measures to correct the missed goal of completing 100% of the QA/QC audits.

---

<sup>134</sup> [SDG&E's 2022 WMP Update](#), p. 293

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>135</sup> Response to DR-224, question 53.

<sup>136</sup> Response to DR-224, question 54.

<sup>137</sup> [SDG&E's 2022 WMP Update](#), p. 293

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>138</sup> Response to DR-224, question 55; attachment “OEIS-SDGE-224\_Q55.xlsx.”

<sup>139</sup> Response to DR-224, question 55; attachment “SDGE Response OEIS-SDGE-DR-224.pdf.” p. 48.

<sup>140</sup> Response to DR-230, questions 94 and 95; attachment “OEIS-SDGE-230\_Q94 & Q95.pdf.”

## Finding

SDG&E provided information consistent with the completion of work identified in Initiative 7.3.5.13: Quality Assurance / Quality Control of Vegetation Management.

### A.14 Initiative 7.3.5.14 Recruiting and Training of Vegetation Management Personnel

The purpose of this initiative is to facilitate “Programs to ensure that the utility can identify and hire qualified vegetation management personnel and to ensure that both employees and contractors tasked with vegetation management responsibilities are adequately trained to perform vegetation management work, according to the utility’s wildfire mitigation plan, in addition to rules and regulations for safety. Include discussion of continuous improvement of training programs and personnel qualifications.”<sup>141</sup>

## Statements, Supporting Information and Analysis, and Conclusions

### Statement 47

Statement: “SDG&E measures the success of contractor training and performance through metrics such as the number of customer complaints, outages, audit findings, claims, notice of violations, ignitions, and safety incidents.”<sup>142</sup>

Supporting Information and Analysis: SDG&E assessed the success and performance of two SDG&E tree trimming contractors in 2022. In total, the two contractors received eight claims, 157 complaints, zero outages, zero Notice of Violations (NOVs), zero ignitions, and eight OSHA-reportable claims in 2022.<sup>143</sup>

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

### Statement 48

---

<sup>141</sup> [Update Guidelines](#), attachment 2, p. 94

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true>, accessed May 10, 2024).

<sup>142</sup> [SDG&E's 2022 WMP Update](#), p. 294

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>143</sup> Response to DR-224, question 56.

Statement: “SDG&E requires all contractors to perform annual training to address issues such as species identification, hazard tree assessment, customer engagement, fire preparedness, and environmental awareness/regulations.”<sup>144</sup>

Supporting Information and Analysis: SDG&E provided training materials distributed during the annual training for contractors, which discussed topics related to hazard tree assessments, environmental and cultural training, wildfire prevention, and customer service and public relations.<sup>145</sup> Approximately 321 individuals attended the annual training.<sup>146</sup> SDG&E also included a sign-in sheet from a May 2022 fire prevention training.<sup>147</sup>

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

#### Statement 49

Statement: “SDG&E provides training to contractors when scoping activities are changed or modified and documents changes via memorandum or procedural updates.”<sup>148</sup>

Supporting Information and Analysis: SDG&E provided its Vegetation Management Highest Fire Threat District (HFTD) Tree Inspection Scope of Work, updated in April 2022, which provides inspection and off-cycle patrol guidelines and procedures within the HFTD as well as protocols for hazard trees.<sup>149</sup> SDG&E also provided a screenshot of an invitation for a bi-weekly meeting SDG&E conducted with its contractors throughout 2022. During these meetings, SDG&E discussed its HFTD inspection schedule, including items related to tracking PI Routine inspections, assigning and tracking off cycle HFTD patrol progress, and overall results and findings during patrols.<sup>150</sup>

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

#### Statement 50

---

<sup>144</sup> [SDG&E's 2022 WMP Update](#), p. 294

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>145</sup> Response to DR-224, question 57; attachment “2022 Hazard Tree Training Documents\_Redacted.pdf,” and “ECI Fire Training Agenda and ESP 113.1 Training Doc 2022\_Redacted.pdf.”

<sup>146</sup> Response to DR-224, question 58; attachment “SDGE Response OEIS-SDGE-DR-224.pdf,” p. 50.

<sup>147</sup> Response to DR-224, question 59; attachment “Davey Fire Prevention Training\_2022 Signature sheet\_Redacted.”

<sup>148</sup> [SDG&E's 2022 WMP Update](#), p. 294

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>149</sup> Response to DR-224, question 60; attachment “OC\_HFTD\_Scope.pdf.”

<sup>150</sup> Response to DR-224, question 60; attachment “Meeting Schedule\_Redacted.pdf.”



Statement: “All contractors are required to develop a company Fire Plan and to train staff annually.”<sup>151</sup>

Supporting Information and Analysis: SDG&E provided the Fire Plan developed by each contractor used in 2022.<sup>152</sup> The Fire Plans include policies and procedures for staff and promote safety and wildfire preparedness in hazard and high-risk environments. SDG&E’s contractors also included sign-in sheets from their annual wildfire and prevention training for staff in 2022.<sup>153</sup>

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

### Statement 51

Statement: “Contractors must be enrolled in the ISNetworld safety clearinghouse that scores and tracks contractor safety performance and must meet minimum safety thresholds to remain a viable vendor and work for SDG&E.”<sup>154</sup>

Supporting Information and Analysis: SDG&E provided an Excel file listing 1,339 contractors, along with their company ID and safety score, who were enrolled in SDG&E’s ISNetworld safety clearinghouse site in 2022. Contractors must maintain a minimum ISNetworld safety score of 70 in order to work for SDG&E, of which SDG&E’s contractors scored an average ISN safety score of 79.38 in 2022.<sup>155</sup>

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

---

<sup>151</sup> [SDG&E’s 2022 WMP Update](#), p. 294

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>152</sup> Response to DR-224, question 61; attachments “2022 UTS 2021 075 HIGH RISK WLFPP Fire Prevention Plan.pdf”, “Davey Fire Prevention Plan Complete Field Guide Training Doc 2022.pdf”, “Davey Resource Wildfire Safety management Plan Document April 2022.pdf” and “ECI WFPP PLAN.pdf.”

<sup>153</sup> Response to DR-224, question 62; attachments “2022 Annual Training Wildland Fire Preparedness and Prevention Training Signature sheet\_Redacted.pdf”, “Davey Fire Prevention Training\_2022 Signature sheet\_Redacted.pdf”, “DRG SDGE 2022 Annual Training – Electronic Signature Sheet1\_Redacted.pdf” and “ECI Fire Training 2022 Signature Sheets\_Redacted.pdf.”

<sup>154</sup> [SDG&E’s 2022 WMP Update](#), p. 295

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>155</sup> Response to DR-224, questions 63, 64, and 65.

**Statement 52**

Statement: “Contractors take annual conflict resolution training to deal with customers who pose a safety threat.”<sup>156</sup>

Supporting Information and Analysis: SDG&E provided annual conflict training materials and sign-in sheets SDG&E conducted in 2022 in coordination with its contractors.<sup>157</sup> The training materials provide contractors and staff guidelines and recommendations on customer relations and conflict resolution.

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

**Statement 53**

Statement: “Tree trim contractors must have a dedicated safety representative on property to conduct ongoing field observations, workforce training, and incident investigations.”<sup>158</sup>

Supporting Information and Analysis: SDG&E provided five examples of when a safety representative was on site to observe tree trim contractors and report incidents as needed.<sup>159</sup> The safety representatives recorded their observations, such as improper use of tie-ins or climbing gear and included the corresponding training materials related to these incidents.<sup>160</sup>

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

**Statement 54**

Statement: “SDG&E collaborated with the IOUs, Utility Arborist Association, industry professionals, and academia to develop and implement a “Utility Arborist Trainee” curriculum for community colleges throughout California.”<sup>161</sup>

---

<sup>156</sup> [SDG&E's 2022 WMP Update](#), p. 295

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>157</sup> Response to DR-224, question 66; attachments “2022 Annual Public Relations Training Signature Sheet\_Redacted.pdf”, “Davey Customer Service Review\_2022 Signature Sheet\_Redacted.pdf”, “DRG SDGE 2022 Annual training – Electronic Signature Sheet1.pdf”, “DAVEY SDGE CUSTOMER SERVICE TRAINING Presentation 2022.pdf”, “ECI – Customer Service SDGE Training Document 2022.pdf” and “UTS 2022 Annual Public Relations Training Document.pdf.”

<sup>158</sup> [SDG&E's 2022 WMP Update](#), p. 295

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>159</sup> Response to DR-224, question 67; attachment “OEIS-SDGE-224\_Q67\_Redacted.xlsx.”

<sup>160</sup> Response to DR-224, question 67; attachments “Climbing Gear Inspections LCQs 10.5.pdf,” “LCQs 1.6 PPE.pdf,” “LCQs 10.7 Climbing & Tie-In.pdf,” and “Spotter Policy.pdf.”

<sup>161</sup> [SDG&E's 2022 WMP Update](#), p. 295

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

Supporting Information and Analysis: SDG&E provided Utility Arborist Trainee curriculum and a listing of the Cohort for 2022. The curriculum included input from IOUs, Utility Arborist Association, industry professionals, and academia. Fourteen individuals participated in the 200-hour course, which discussed topics such as pruning, herbicide training and OSHA 10 certification.<sup>162</sup>

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

#### Statement 55

Statement: “SDG&E’s Safety Department supports Vegetation Management by utilizing a third-party vendor to perform field safety observations.”<sup>163</sup>

Supporting Information and Analysis: SDG&E provided three service agreements from third-party vendors who contract with SDG&E to perform field safety observations.<sup>164</sup>

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

#### Statement 56

Statement: “The inaugural line-clearance tree trimming training class sponsored by SDG&E and the Utility Arborist Association was completed in Quarter 3 of 2021...This program will also be expanded in Quarter 2 2022 to develop classroom and field curriculum courses for Pre-inspection.”<sup>165</sup> SDG&E continues, “SDG&E will review their training programs to determine the applicability of species identification in conjunction with other vegetation activities and encourage personnel to identify genus/species.”<sup>166</sup>

Supporting Information and Analysis: SDG&E provided a syllabus for the Utility Line Clearance Arborist Pre-Apprentice Program, which included a course overview, learning objectives, and course instructional materials.<sup>167</sup> The 200-hour training course reviewed topics related to arborist and general safety, mobile equipment and jobsite, chainsaw and chipper operations, electrical hazards, pruning and climbing, and required trainees to participate in skills practice

<sup>162</sup> Response to DR-224, question 68; attachment “Arborist Grad Program\_Redacted.pdf.”

<sup>163</sup> [SDG&E’s 2022 WMP Update](#), p. 295

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>164</sup> Response to DR-224, question 69; attachments “ICON Agreement\_Redacted.pdf,” “Jingoli Power\_Redacted.pdf” and “Professional Safety Solutions\_Redacted.pdf.”

<sup>165</sup> [SDG&E’s 2022 WMP Update](#), p. 295

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>166</sup> [SDG&E’s 2022 WMP Update](#), p. 295

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>167</sup> Response to DR-224, question 70; attachment “Syllabus ULC.doc.”

and assessments.<sup>168</sup> SDG&E also included the trainees' contact information, sign-in sheets, images of trainees' certifications, and the graduation program which concluded the program in August 2022.<sup>169</sup> SDG&E provided a Genus Species Tree Guide and a Eucalyptus Species Guide, which include images and descriptions of the various species types.<sup>170</sup>

Conclusion: SDG&E provided information consistent with the completion of work identified in these statements.

## Finding

SDG&E provided information consistent with the completion of work identified in Initiative 7.3.5.14: Recruiting and Training of Vegetation Management Personnel.

### A.15 Initiative 7.3.5.15 Identification and Remediation of “at-risk species”

The purpose of this initiative is that “Specific actions, not otherwise described in other WMP initiatives, taken to reduce the ignition probability and wildfire consequence attributable to “at-risk species,” such as trimming, removal, and replacement.”<sup>171</sup>

## Statements, Supporting Information and Analysis, and Conclusions

### Statement 57

Statement: “SDG&E aims to achieve clearances up to 25 feet where deemed to present the optimal risk mitigation approach.”<sup>172</sup>

Supporting Information and Analysis: SDG&E aims to achieve enhanced clearances up to 25 feet, as stated in the excerpt from SDG&E’s enhanced clearance procedure below:

<sup>168</sup> Response to DR-224, question 70; attachment “Grad Program 2\_Redacted.pdf.”

<sup>169</sup> DR-224, question 70; attachments “EHAP Registration\_Redacted.xlsx,” “STUDENT-DAILY-SIGN-IN-SHEET(1)\_Redacted.pdf,” “DoNot.Reply\_20220816\_093611\_Redacted.pdf,” and “Grad Program 2\_Redacted.pdf.”

<sup>170</sup> Response to DR-224, question 72; attachments “Eucalyptus Species Guide (Q.72).pdf” and “EPOCH Genus\_Species Tree Guide (Q.72).pdf.”

<sup>171</sup> [Update Guidelines](#), attachment 2, p. 94

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true>, accessed May 10, 2024).

<sup>172</sup> [SDG&E’s 2022 WMP Update](#), p. 295

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

Greater than or equal to 12 feet at time of trim, which is the CPUC-recommended post-trim clearance for distribution voltages in the HFTD. SDG&E aims to achieve clearances up to 25 feet where deemed to present the optimal risk mitigation approach. The determination of how much clearance is to be obtained at time of trim is based on several tree factors including minimum clearance requirement, voltage, species, location, branch structure, tree health, proper pruning practices, location of tree defect, etc. The tree contractor makes the determination of post-trim clearances in order to maintain compliance for the annual cycle, and to abate any structural hazard present in the tree.

SDG&E also included an Excel file listing approximately 20,000 trees that were trimmed to clearances ranging from 12 to 30 feet in 2022, of which approximately 31% were trimmed to enhanced clearances of 20 to 30 feet.<sup>173</sup>

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

#### Statement 58

Statement: “SDG&E continued to collaborate with the SDSC to model its tree data. The project’s goal was to use Vegetation Management’s inventory tree data and outage history to develop a predictive risk analysis tool. Results from study corroborate SDG&E’s premise and practice of obtaining greater clearance to reduce the frequency of tree-related outages.”<sup>174</sup>

Supporting Information and Analysis: SDG&E held bi-weekly meetings for nearly six months in 2022 with representatives from the San Diego Supercomputer Center (SDSC) to discuss the ongoing study on developing predictive modeling related to tree-related outages.<sup>175</sup> SDG&E provided a copy of the 2022 presentation which provides summaries of the study and analyzes various types of outages that occurred. Based on SDSC’s analysis, outages occurred 0.03% from 2011 to 2019.<sup>176</sup>

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

---

<sup>173</sup> Response to DR-224, question 73; attachment “OEIS-SDGE-224\_Q73.xlsx.”

<sup>174</sup> [SDG&E’s 2022 WMP Update](#), p. 299

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>175</sup> Response to DR-224, question 74; attachment “OEIS-SDGE-224\_Q74\_Redacted.pdf.”

<sup>176</sup> Response to DR-224, question 74; attachment “OEIS-SDGE-224\_Question74.pdf.”

## Finding

SDG&E provided information consistent with the completion of work identified in Initiative 7.3.5.15: Identification and Remediation of “at-risk species.”

### A.16 Initiative 7.3.5.16 Removal and Remediation of Trees with Strike Potential to Electric Lines and Equipment

The purpose of this initiative is that “Actions taken to identify, remove, or otherwise remediate trees that pose a high risk of failure or fracture that could potentially strike electrical equipment.”<sup>177</sup>

## Statements, Supporting Information and Analysis, and Conclusions

### Statement 59

**Statement:** “Inspections must be performed by qualified individuals skilled in tree species identification, diseases, tree biology and mechanics, hazard characteristics, and risk assessment.”<sup>178</sup>

**Supporting Information and Analysis:** SDG&E provided an Excel file listing the internal and/or third-party inspector, the VMA the individual inspected, and the inspector’s ISA Certification number. Every internal and third-party individual that performed SDG&E’s inspections maintained an ISA Certification.<sup>179</sup>

**Conclusion:** SDG&E provided information consistent with the completion of work identified in this statement.

---

<sup>177</sup> [Update Guidelines](#), attachment 2, p. 94

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true>, accessed May 10, 2024).

<sup>178</sup> [SDG&E’s 2022 WMP Update](#), p. 299

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>179</sup> Response to DR-224, question 75; attachment “OEIS-SDGE-224\_Q75.”



**Statement 60**

Statement: “ISA Certified Arborists trained in hazard tree evaluation perform these inspections, which include a critical look at any tree that could strike the power lines.”<sup>180</sup>

Supporting Information and Analysis: SDG&E provided an Excel file that lists 14 trees that were identified as hazardous and were selected for removal. The Excel file includes information, such as the identification date, tree species, VMA, and additional comments.<sup>181</sup>

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

**Statement 61**

Statement: “A third-party contractor performs an audit on 100 percent of all trees removed to ensure work was completed per scope and contract including an assessment of the efficacy of stump treatment application and facility protection.”<sup>182</sup>

Supporting Information and Analysis: SDG&E provided an Excel file listing 94 trees identified as hazard trees and removed in 2022.<sup>183</sup>

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

**Statement 62**

Statement: “The twice annual hazard assessment tree patrol in the HFTD is scheduled to occur 6 months (“midcycle”) following the routine tree inspection activity.”<sup>184</sup>

Supporting Information and Analysis: SDG&E provided the routine pre-inspection scheduling work orders for the 133 VMAs in SDG&E’ service territory and the tree trim dispatch work orders for the 106 VMAs that are located in the HFTD.<sup>185</sup> The Excel file includes tree location and date of routine and off-cycle work completed in 2022. The average number of days between routine work and off-cycle work was 163 days for trees that required work.

---

<sup>180</sup> [SDG&E’s 2022 WMP Update](#), p. 299

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>181</sup> Response to DR-224, question 76; attachment “OEIS-SDGE\_Q76.xlsx.”

<sup>182</sup> [SDG&E’s 2022 WMP Update](#), p. 299

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>183</sup> Response to DR-224, question 77; attachment “OEIS-SDGE-224\_Q77.”

<sup>184</sup> [SDG&E’s 2022 WMP Update](#), p. 300

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>185</sup> Response to DR-224, question 78; attachment “OEIS-SDGE-224\_Q78.”

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

## Finding

SDG&E provided information consistent with the completion of work identified in Initiative 7.3.5.16: Removal and Remediation of Trees with Strike Potential to Electric Lines and Equipment.

## A.17 Initiative 7.3.5.17 Substation Inspections

The purpose of this initiative is to inspect “vegetation surrounding substations.”<sup>186</sup>

### Statements, Supporting Information and Analysis, and Conclusions

SDG&E’s 2022 WMP Update, Initiative 7.3.5.17 Substation Inspections, directs readers to Initiative 7.3.5.15. Therefore, Energy Safety did not conduct a separate analysis of the work performed for this initiative.

## Finding

See the finding for Initiative 7.3.5.15.

## A.18 Initiative 7.3.5.18 Substation Vegetation Management

The purpose of this initiative is to take actions “to reduce the ignition probability and wildfire consequences attributable to contact from vegetation to substation equipment.”<sup>187</sup>

---

<sup>186</sup> [Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true), attachment 2, p. 94

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true>, accessed May 10, 2024).

<sup>187</sup> [Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true), attachment 2, p. 94

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true>, accessed May 10, 2024).

## Statements, Supporting Information and Analysis, and Conclusions

SDG&E's 2022 WMP Update, Initiative 7.3.5.18 Substation Vegetation Management, directs readers to Initiative 7.3.5.15. Therefore, Energy Safety did not conduct a separate analysis of the work performed for this initiative.

### Finding

See the finding for Initiative 7.3.5.15.

## A.19 Initiative 7.3.5.19 Vegetation Management System

The purpose of this initiative is that “Inputs, operation, and support for a centralized vegetation management enterprise system updated based upon inspection results and management activities such as trimming and removal of vegetation.”<sup>188</sup>

## Statements, Supporting Information and Analysis, and Conclusions

### Statement 63

Statement: “Vegetation Management maintains a robust electronic tree inventory and work management database that tracks the inspection, trimming, and auditing activity of its nearly 460,000 inventory trees.”<sup>189</sup>

Supporting Information and Analysis: SDG&E provided screenshots of its electronic tree inventory work management database. The screenshots of the database display the ability for users to create and track work orders as well as the ability to leverage the electronic field user application (EPOCH) while out in the field.<sup>190</sup>

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

### Statement 64

<sup>188</sup> [Update Guidelines](#), attachment 2, p. 94

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true>, accessed May 10, 2024).

<sup>189</sup> [SDG&E's 2022 WMP Update](#), p. 301

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>190</sup> Response to DR-224, question 79; attachment “OEIS-SDGE-224\_Q79\_Redacted.pdf.”

Statement: “SDG&E monitors all trees in its inventory using known species growth rates, tree and site-specific conditions, and past pruning practices.”<sup>191</sup>

Supporting Information and Analysis: SDG&E provided a representative sample of its nearly 500,000 trees in inventory. Trees are categorized by their VMA location, growth rate (Slow, Medium, Fast), species, and HFTD tier (Tier 2, Tier 3, Non-HFTD) in addition to several other characteristics.<sup>192</sup>

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

#### Statement 65

Statement: “SDG&E has a team of IT analysts, business control, and personnel to support the PowerWorkz management system.”<sup>193</sup>

Supporting Information and Analysis: SDG&E provided an Excel file which listed the five vendors that contracted with SDG&E to support the PowerWorkz management system.<sup>194</sup> In 2022, SDG&E had four IT/Architects who designed and developed enhancements for the PowerWorkz application (i.e., server upgrades), four personnel/support individuals who manage project enhancements, service accounts for new PowerWorkz users, and six internal business control individuals who validate the accuracy and functionality of the new PowerWorkz system design enhancements through user testing.<sup>195</sup>

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

## Finding

SDG&E provided information consistent with the completion of work identified in Initiative 7.3.5.19: Vegetation Management System.

---

<sup>191</sup> [SDG&E's 2022 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true), p. 301

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>192</sup> Response to DR-224, question 80; attachment “OEIS-SDGE-224\_Q80.xlsx.”

<sup>193</sup> [SDG&E's 2022 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true), p. 301

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>194</sup> Response to DR-224, question 81; attachment “OEIS-SDGE-224\_Q81.xlsx.”

<sup>195</sup> Response to DR-224, question 81; attachment “SDGE Response OEIS-SDGE-DR-224.pdf.”

## A.20 Initiative 7.3.5.20 Vegetation Management to Achieve Clearances Around Electric Lines and Equipment

The purpose of this initiative is that “Actions taken to ensure that vegetation does not encroach upon the minimum clearances set forth in Table 1 of GO 95, measured between line conductors and vegetation, such as trimming adjacent or overhanging tree limbs.”<sup>196</sup>

### Statements, Supporting Information and Analysis, and Conclusions

#### Statement 66

Statement: “Three separately scheduled pole brush activities are performed annually, including mechanical brushing, chemical application, and re-clearing. Pole brush inspection occurs in conjunction with the tree inspection activity.”<sup>197</sup>

Supporting Information and Analysis: SDG&E provided an Excel file listing approximately 34,000 pole brush inspections that were completed in 2022. The file included the pole number, activity type, activity date and work order number.<sup>198</sup>

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

#### Statement 67

Statement: “An environmental review is performed in advance of all new pole brushing activities to assess impacts to protected species and habitat.”<sup>199</sup>

Supporting Information and Analysis: SDG&E provided an Excel file that lists pole brushing activities that received an environmental review in 2022 including the pole number of the

---

<sup>196</sup> [Update Guidelines](#), attachment 2, p. 95

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true>, accessed May 10, 2024).

<sup>197</sup> [SDG&E's 2022 WMP Update](#), p. 302

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>198</sup> Response to DR-224, question 82; attachment “OEIS-SDGE-224\_Q82.”

<sup>199</sup> [SDG&E's 2022 WMP Update](#), p. 303

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

new poles, date of the environmental review was carried out and date of when the pole brushing was conducted.<sup>200</sup>

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

#### Statement 68

Statement: “Like all other vegetation management activities, a QA/QC audit is performed on a random, representative sample of all completed pole-brush work.”<sup>201</sup>

Supporting Information and Analysis: SDG&E provided an Excel file listing the sample of completed pole-brush work that was randomly audited in 2022, including the date of audit and corresponding results.<sup>202</sup>

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

### Finding

SDG&E provided information consistent with the completion of work identified in Initiative 7.3.5.20: Vegetation Management to Achieve Clearances Around Electric Lines and Equipment.

## A.21 Initiative 7.3.5.21 Vegetation Management Activities Post-Fire

The purpose of this initiative is that “Vegetation management (VM) activities during post-fire service restoration including, but not limited to: activities or protocols that differentiate post-fire VM from programs described in other WMP initiatives; supporting documentation for the tool and/or standard the utility used to assess the risk presented by vegetation post-fire; and how the utility includes fire-specific damage attributes into its assessment tool/standard.”<sup>203</sup>

---

<sup>200</sup> Response to DR-224, question 83; attachment “OEIS-SDGE-224\_Q83.”

<sup>201</sup> [SDG&E's 2022 WMP Update](#), p. 303

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>202</sup> Response to DR-224, question 84; attachment “OEIS-SDGE-224\_Q84.”

<sup>203</sup> [Update Guidelines](#), attachment 2, p. 95

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true>, accessed May 10, 2024).



## Statements, Supporting Information and Analysis, and Conclusions

### Statement 69

Statement: “Post-fire tree inspections are performed throughout the service territory in response to small fires impacting single trees and in response to large, multi-acre wildfires where there is the potential of future threat to the power lines.”<sup>204</sup>

Supporting Information and Analysis: SDG&E conducted one post-fire tree inspection in 2022 after the Border-32 fire. The Border-32 fire burned approximately 4500 acres in rural backcountry east of San Diego in SDG&E’s service territory and required a post-fire hazard tree inspection. SDG&E provided a work order report which included 14 trees identified during this patrol and required work. SDG&E provided an Excel file listing the tree IDs associated with this post-fire inspection, the inspection dates, the tree trim/removal dates, and the completed work type (condition code).<sup>205</sup> This same information, generated by SDG&E’s database, was also supplied with additional observations of hazardous conditions of fire-damaged trees. SDG&E also provided a screenshot of the Border-32 fire perimeter, which identified SDG&E structures. SDG&E also provided a photo of a eucalyptus tree, identified in SDG&E’s inventory. DJ340 was adjacent to power lines and was found to have suffered major trunk damage from the fire upon inspection. According to the work order report, DJ340 was identified as “Dead or Dying” and received “Reliability Pruning.”<sup>206</sup>

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

## Finding

SDG&E provided information consistent with the completion of work identified in Initiative 7.3.5.21: Vegetation Management Activities Post-Fire.

---

<sup>204</sup> [SDG&E’s 2022 WMP Update](#), p. 305

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>, accessed May 10, 2024).

<sup>205</sup> Response to DR-224, question 85; attachment “OEIS-SDGE-224\_Q85.”

<sup>206</sup> Response to DR-241, attachments “OEIS-SDGE-DR-241,” “VM-17,” “VM-44,” “Fire Damage,” and “Fire Perimeter Map\_Border 32\_Fire.”

**DATA DRIVEN**  
**FORWARD-THINKING**  
**INNOVATIVE**  
**SAFETY FOCUSED**

