



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

July 10, 2025

VIA ELECTRONIC FILING

Docket # 2024 NOV

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

**RE: San Diego Gas & Electric Company's Response to Notice of Violation –
NOV_CAD_SDGE_SIS_20250326_1024**

Dear Program Manager Doherty:

San Diego Gas & Electric Company (SDG&E) provides this response to the finding identified in the Notice of Violation "NOV_CAD_SDGE_SIS_20250326_1024" (Notice of Violation or NOV) issued by the Office of Energy Infrastructure Safety's (Energy Safety) on June 10, 2025 regarding Energy Safety's inspection of work completed by SDG&E in accordance with its 2024 Wildfire Mitigation Plan (WMP). Specifically, the NOV describes that on March 26, 2025, Energy Safety conducted an inspection of SDG&E's WMP initiatives in the vicinity of the city of Spring Valley, California and found the following violation:

Violation 1. Energy Safety observed that in implementing 2024 WMP initiative 8.1.2.10.1 – Avian Protection Program (WMP.972), SDG&E failed to complete the avian protection installation on Pole ID P674117J, Grid Hardening ID 530000352767-P674117J, at coordinates 32.7261422709913, -116.915681169163. Energy Safety considers this completeness violation to be in the Minor risk category.

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

¹ See Pub. Util. Code §8386.1.

I. SDG&E RESPONSE

A. Violation 1 – Failure to Complete Avian Protection Installation

SDG&E resolved this violation by installing two avian line protections on the outside conductors and avian covers for the Cal Fire Lightning Arrestors on P674117J on June 25, 2025, as demonstrated in the following photos. Please refer to the three figures below.

Figure 1



Figure 2



Figure 3



II. CONCLUSION

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

Respectfully submitted,

/s/ Laura M. Fulton

Attorney for
San Diego Gas and Electric Company