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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_ATJ_20250325_0829**

Dear Program Manager Doherty:

San Diego Gas & Electric (SDG&E) provides this response to the finding identified in the Notice of Violation "NOV_CAD_SDGE_ATJ_20250325_0829" (Notice of Violation or NOV) issued by the Office of Energy Infrastructure Safety's (Energy Safety) on June 16, 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 25, 2025, Energy Safety conducted an inspection of SDG&E's WMP initiatives in the vicinity of the city of Alpine, California and found the following violation:

Violation 1. Energy Safety observed that in implementing 2024 WMP initiative 8.1.2.1 - Covered Conductor Installation (WMP.455), SDG&E failed to complete Covered Conductor Installation on pole ID P275777, Grid Hardening ID P275777_0073-R-CC_4102 at coordinates 32.760862481866, 116.688413323077. Energy Safety considers this completeness violation to be in the Moderate 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 – Excessively Loose Down Guy Wire Resulting in Primary Fiberglass Strain Insulator to Rest on Crossarm Suspension Dead-End Insulator.

Following an internal review and root cause analysis, SDG&E believes that the guy wire giving rise to the cited infraction is attributable to the actions of a third-party Communication Infrastructure Provider (CIP). SDG&E believes that after completion of construction and quality control due diligence, the CIP materially altered the facility's condition and compromised its compliance with the referenced standards when transferring its infrastructure to SDG&E's facility.

Imagery and documentation contemporaneous with the completion of construction and obtained on December 17, 2024 (see Figures 1–3) by QA/QC inspectors validate the facility's compliance at the time of inspection. Between December 17, 2024, and March 25, 2025, the only known modification to Pole P275777 was the transfer of the CIP's facilities to the newly constructed structure.

Furthermore, based on: (1) the postulated directionality of the load (i.e., force) resulting from the CIP's transfer, (2) the induced deflection observed in the structure, and (3) the resulting slack in the down guy producing identified violation, the evidence indicates that the CIP's actions were the cause of the nonconformity identified in the violation. Imagery obtained by OEIS on March 25, 2025 (Figure 4), depicts the CIP's facilities affixed to the new pole, overlaid with the aforementioned phenomena for illustrative purposes.

SDG&E maintains that, prior to the CIP's intervention, the facility was in a compliant state and that all operational and regulatory obligations had been duly observed. Accordingly, SDG&E respectfully requests that OEIS consider the extenuating circumstances and the demonstrable third-party causation in its evaluation of this matter.

Notwithstanding the above, SDG&E resolved the violation on June 24, 2025, by tightening the guy wire on Pole P275777 (see Figures 5 and 6).

Figure 1 - Image acquired during QA/QC inspection on 12/17/2024, notating state of CIP (attached to adjacent pole) and subject hardware identified in notice of violation



Figure 2 - Image acquired during QA/QC inspection on 12/17/2024 showing clearance between down guy and insulator



Figure 3 - Image acquired during QA/QC inspection on 12/17/2024 showing clearance between down guy and insulator

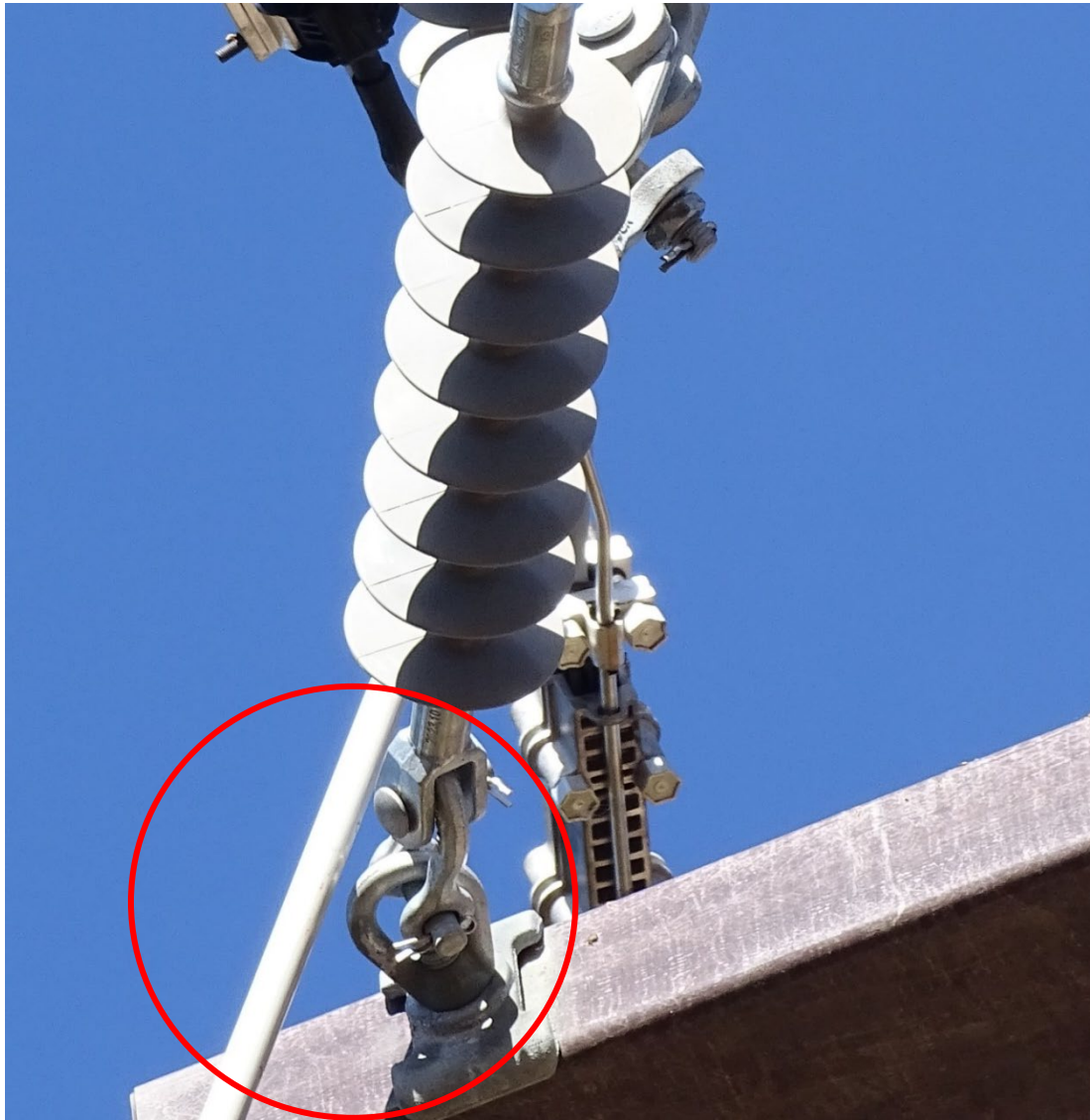


Figure 4 – Image obtained on 3/25/2025 by OEIS and provided in NOV report showing CIP transferred to new facility, overlay with directionality of force induced by CIP facility, postulated deflection of structure caused by CIP attachment, and subject hardware conflict (for illustration purposes only)

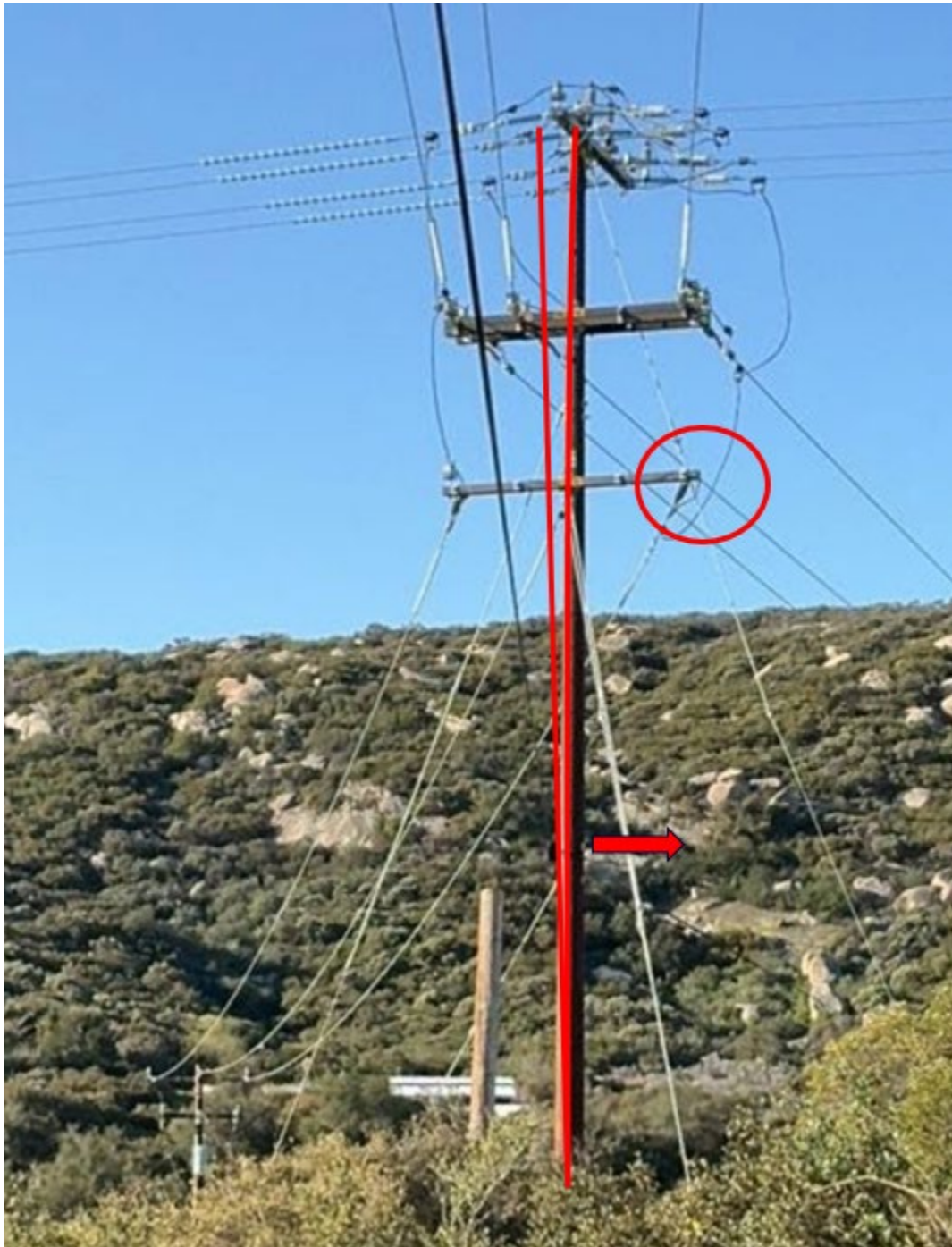


Figure 5 - Image captured on 6/24/2025 by SDG&E construction team after modification of facility

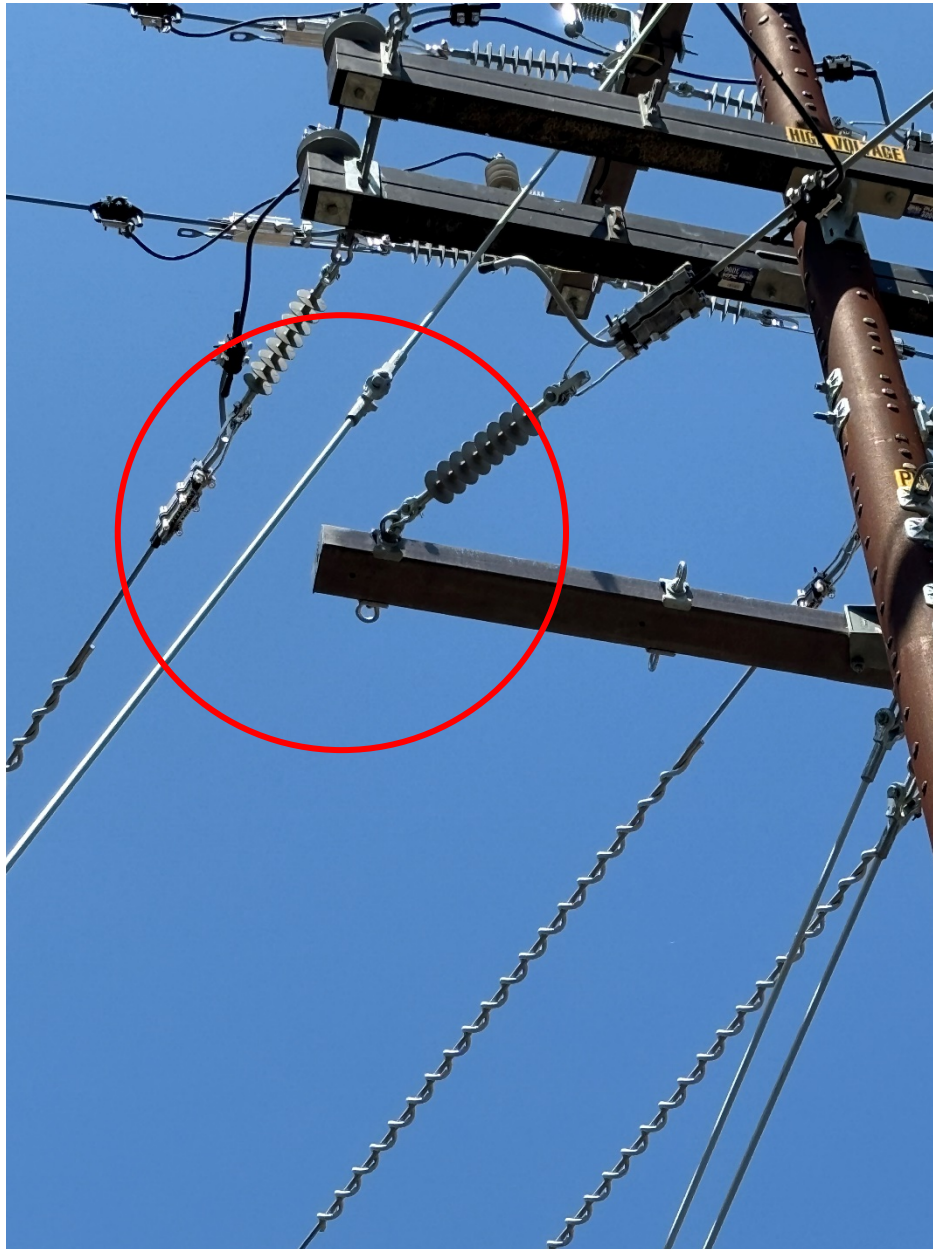


Figure 6 - Image captured on 6/24/2025 by SDG&E construction team after modification of facility



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