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VIA ELECTRONIC FILING

Docket # 2025 NODI

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

**RE: San Diego Gas & Electric Company's Response to Notice of Data Inaccuracy –
NODI_PAD_SDGE_SIS_20251008_1332**

Dear Program Manager Doherty:

San Diego Gas & Electric Company (SDG&E) provides this response to the finding identified in the Notice of Data Inaccuracy “NODI_PAD_SDGE_SIS_20251008_1332” (Notice of Data Inaccuracy or NODI) issued by the Office of Energy Infrastructure Safety’s (Energy Safety) on February 3, 2026 regarding Energy Safety’s inspection of work completed by SDG&E in accordance with its 2025 Wildfire Mitigation Plan (WMP). Specifically, the NODI describes that on October 8, 2025, Energy Safety conducted an inspection of San Diego Gas & Electric Company’s WMP initiatives in the vicinity of the city of Valley Center, California and found the following data inaccuracies:

Data Inaccuracy 1. On Pole ID P612194, Grid Hardening ID P612194_0350-L-CC_83638 at coordinates 33.3146668789374, -117.102580, the inspector observed that SDG&E failed to provide accurate data.

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

¹ See Pub. Util. Code §8386.1.

I. SDG&E RESPONSE

A. Data Inaccuracy 1 – Inaccurate Data Provided on Covered Conductor Installation

The scope of work at location P612194 was to remove a span of bare conductor between the subject pole and a pole to the southwest because there was no longer a load to serve. The remaining bare conductor was to remain in place as the section of the circuit was previously hardened as part of the Fire Risk Mitigation (FiRM) program in 2018. Figure 1 below is from the design Construction Sketch, where the span was removed (location 17) between location 11 (P612194) and location 12 (P102233).

Figure 1: Excerpt from design Construction Sketch for P612194, where the scope of work only required the removal of a span of wire from P612194 to P102233, and the removal of P102233.

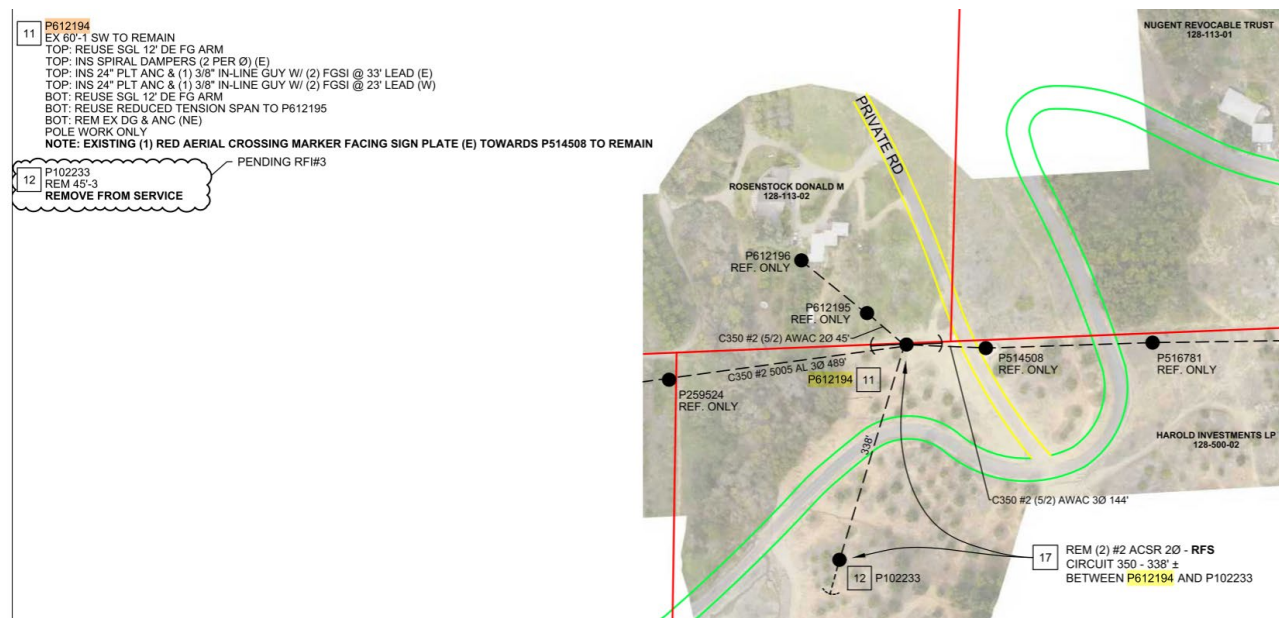
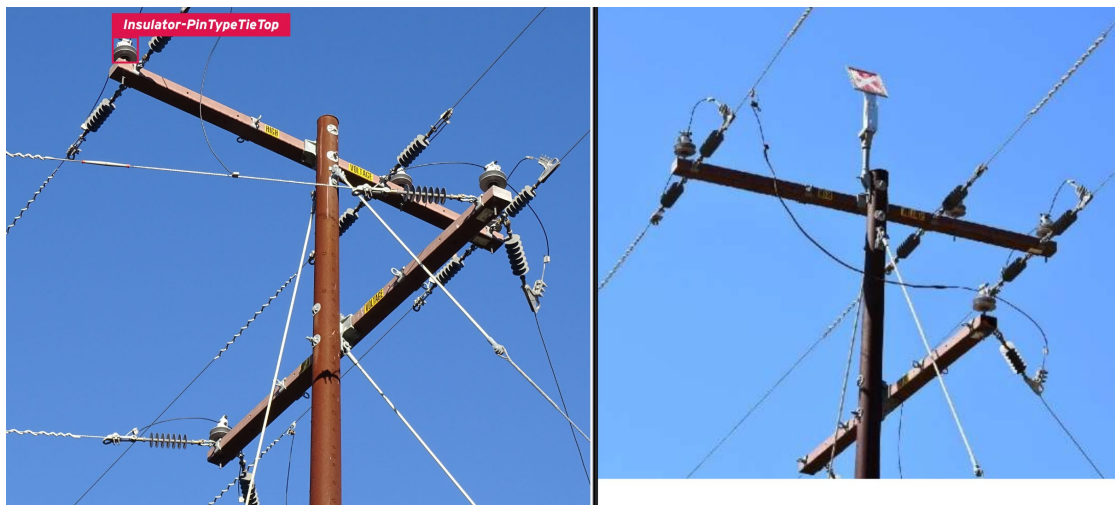


Figure 2 below includes two pictures. The picture on the left is from DIAR (drone investigation, assessment & repair program) program taken on 3/1/2022, which shows the original condition of the pole, including the span that was subsequently removed pursuant to the project described above. The picture on the right is from the Notice of Data Inaccuracy on 10/8/2025 and shows that the span was removed per the job description.

Figure 2: Photos before (left) and after (right) Covered Conductor project was completed at P612194.



As stated in the SDG&E's 2026-2028 Base Wildfire Mitigation Plan, and prior plans, as part of its covered conductor program, SDG&E does take the liberty where possible to remove equipment that is no longer in use as it provides 100% risk reduction and reduces ongoing maintenance as shown in Figure 3 below.²

Figure 3: Excerpt from SDG&E's Base 2026-2028 WMP

8.2.9 LINE REMOVAL (IN THE HFTD)

8.2.9.1 TRACKING ID

N/A – Line removals are related to the Strategic Undergrounding and Combined Covered Conductor, or Overhead Traditional Hardening Programs and as such, do not have a separate Utility Initiative Tracking ID.

8.2.9.2 OVERVIEW OF THE ACTIVITY

SDG&E proactively removes overhead lines as part of the Strategic Undergrounding and Combined Covered Conductor Programs. For example, if a circuit segment is planned to be undergrounded, all associated overhead infrastructure would be removed. **For covered conductor installations, overhead distribution lines are removed from service if they are no longer in use.**



² SDG&E's 2026-2028 Base WMP, Section 8.2.9.2 at p. 200, available at <https://www.sdge.com/2026-2028-wildfire-mitigation-plan>.

Accordingly, SDG&E respectfully submits that it did indeed provide accurate data contrary to the finding in the NODI. Specifically, in its Q2 QDR, SDG&E reported in the Grid Hardening Point feature class the pole (GHID:P612194_0350-L-CC_83638) had a Description of Work as Modified and the associated line segment in the Grid Hardening Line feature class (GHID: Removed_0350-L-CC_91724) had a Description of “Work as Removed” and as discussed above, this is exactly what was completed as the scope of work. SDG&E did not install covered conductor at this location and did not report that it did so.

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