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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\_20251105\_0853**

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\_20251105\_0853" (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 November 5, 2025, Energy Safety conducted an inspection of San Diego Gas & Electric Company's WMP initiatives in the vicinity of the city of Jamul, California and found the following data inaccuracies:

Data Inaccuracy 1. On Pole ID P330064, Grid Hardening ID 530000377023-P330064 at coordinates 32.730586, -116.836448, 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.<sup>1</sup>

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<sup>1</sup> See Pub. Util. Code §8386.1.

## I. SDG&E RESPONSE

### A. Data Inaccuracy 1 – Inaccurate Data Provided on Avian Protection

SDG&E respectfully submits this response to the assertion that the subject overhead distribution facility (P330064) was not constructed in accordance with SDG&E's avian-safe design standards. The work performed within Work Order 530000377023 *did* achieve its intended objectives and is compliant with SDG&E's Overhead Construction Standards, including the avian protection requirements referenced within the Section 1600 series of the standards manual.

Specifically, SDG&E installed avian protection measures consistent with the SDG&E Avian Protection Plan (APP), including avian-safe cover-up devices on the transformer bushings and installation of covered jumper wire (**Figure 1**). These measures align with the avian-safe construction practices described in SDG&E's APP, because transformer cover-up devices and insulated jumpers are expressly identified as accepted avian protection measures. The implementation of these protections renders the transformer equipment avian-safe, consistent with SDG&E's internal standards and the procedures used for avian safety compliance assessments.

Figure 1 - Excerpt from WO 530000377023 bill of material as-built

Location		Location 0003						
Location Comments		P330064, TRUCK ACCESSIBLE. CREWS TO INSTALL AVIAN PROTECTION COVERS. (504-278) LAB: Avian 1B/A, T/C						
CU Name	Work Function	Stock Code	Stock Description		Planned	Actual	Scrap	As Designed
55-5/1	REMOVE	S429270	INSULATOR, VISE TOP, POLYMER, 1". ***THI	EA	1			↓
BS4	REMOVE	S813764	WIRE, #4 AWG 3 STRAND BARE HARD DRAWN CO	FT	10.035			↓
IPU1	INSTALL	S429270	INSULATOR, VISE TOP, POLYMER, 1". ***THI	EA	1			↓
HEND4	INSTALL	S812124	WIRE, CU, #4, 7 STR, COVERED, TAP, SOFT	FT	10			↓
BSHCOV	INSTALL	S289670	COVER, BUSHING, TRANSFORMER, ARRESTER, A	EA	2			↓

It appears OEIS' conclusion regarding non-compliance is premised on an assumption that avian covers must also be installed on the primary conductors. However, SDG&E's standards require installation of conductor avian covers *only when the distance of uncovered primary line conductor (i.e., phase-to-phase, phase-to-ground, or phase-to-neutral) is less than 60 inches*, per SDG&E's Overhead Construction Standard 1620.2.

Per SDG&E's Overhead Construction Standard 380.1, a 6' wood crossarm possesses conductor spacing of **66.5"** (**Figure 2**) when using the deadend configuration. Per LiDAR data, P330064 possesses a 6' wood crossarm. Thereby, the conductor spacing surpasses the minimum 60" spacing requirement that would otherwise necessitate the installation of conductor avian covers, which is further corroborated by LiDAR data (**Figure 3**). Accordingly, the facility is fully compliant with SDG&E's avian protection standards, and the absence of avian covers on the primary conductors is consistent with both SDG&E's internal specifications and industry guidance, including *Suggested Practices for Avian Protection on Power Lines* published by the Avian Power Line Interaction Committee (APLIC 2006).<sup>2</sup>

Figure 2 - Excerpt from SDGE OH 380.1: Wood Crossarm – 6' and 8'

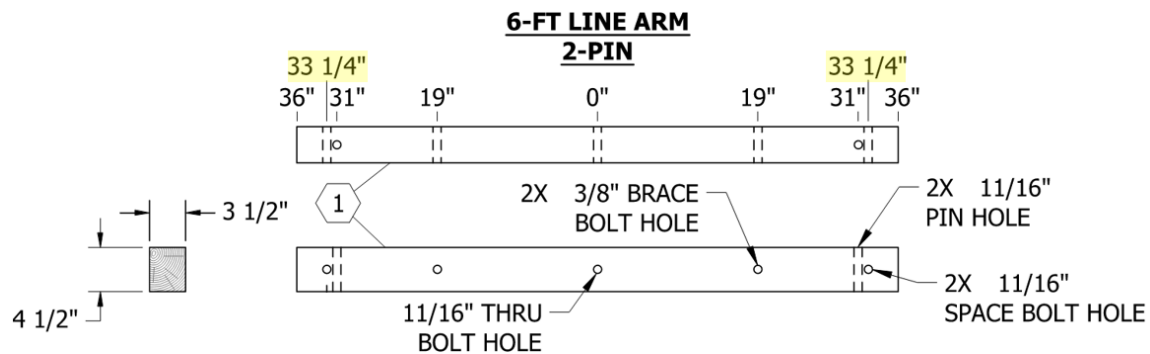


Figure 3 - LiDAR data for P330064 with point-to-point distance between conductors



<sup>2</sup> *Suggested Practices for Avian Protection on Power Lines* is available at <https://www.nrc.gov/docs/ml1224/ml12243a391.pdf>.

In summary, the facility meets SDG&E's avian safety requirements through:

1. Installation of transformer bushing avian covers;
2. Installation of covered jumper wire; and
3. Conductor spacing that meets or exceeds the sixty inch minimum used to determine whether conductor cover-up is required.

Accordingly, SDG&E respectfully submits that it did indeed provide accurate data contrary to the finding in the NODI. The facility is compliant with SDG&E's Overhead Construction Standards and the Avian Protection Plan, and the characterization of this structure as non-avian safe reflects a misunderstanding of SDG&E's design criteria rather than a deficiency in the field work performed.

## 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