



February 26, 2026

To: San Diego Gas and Electric Company
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SUBJECT: San Diego Gas and Electric Company's (SDG&E's) 2024 Vegetation Management Audit (VMA) Report

Pursuant to the requirements of California Public Utilities Code section 8386.3(b)(5)(C), the Office of Energy Infrastructure Safety (Energy Safety) has completed its audit of SDG&E's 2024 Vegetation Management activities included in the 2023-2025 Wildfire Mitigation Plan (WMP).

As described in the attached audit report, Energy Safety concluded that SDG&E has successfully achieved the objectives of 10 initiatives within its vegetation management program and has outstanding deficiencies in three initiatives in performance year 2024. While Energy Safety has identified deficiencies in three areas within SDG&E's vegetation management program, SDG&E has acknowledged these shortfalls and has planned for or initiated corrective actions to address these in future years.

Pursuant to statutory requirements, a copy of this report is issued to SDG&E, published on Energy Safety's 2024 VM Audits Docket, and provided to the California Public Utilities Commission (CPUC).

Sincerely,

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Attachment: SDG&E 2024 VMA Report



OFFICE OF ENERGY INFRASTRUCTURE SAFETY
2024 VEGETATION MANAGEMENT
AUDIT REPORT
SAN DIEGO GAS & ELECTRIC COMPANY

February 26, 2026

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EXECUTIVE SUMMARY

Pursuant to Public Utilities Code section 8386.3(b)(5)(A), the Office of Energy Infrastructure Safety (Energy Safety) may audit the vegetation management work performed by, or on behalf of, the electrical corporation following the end of the performance period.

The San Diego Gas and Electric Company (SDG&E) 2023-2025 WMP had 13 vegetation management initiatives in six programmatic areas. Energy Safety provided its Vegetation Management Audit (VMA) of SDG&E's work related to its vegetation management commitments in its Wildfire Mitigation Plan (WMP) on October 2, 2025 (included in Appendix 1).¹

The VMA identified that SDG&E did not provide sufficient documentation that all work was complete for five of the 13 vegetation management initiatives. SDG&E provided its Corrective Action Plan (CAP) on October 30, 2025 (included in Appendix 2).² The CAP included additional data, clarifications, and corrective actions to address the five deficient vegetation management initiatives.

As discussed in this VMA Report, SDG&E provided sufficient documentation to demonstrate that all work identified in 10 vegetation management initiatives from its 2023-2025 WMP was implemented successfully in 2024 or that SDG&E has provided a CAP that addresses deficiencies for those 10 initiatives. SDG&E has outstanding deficiencies in three of the 13 VM initiatives: 8.2.3.2 Wood and Slash Management, 8.2.3.5 Substation Defensible Space, and 8.2.6 Open Work Orders.

¹ Office of Energy Infrastructure Safety, 2024 VMA of San Diego Gas and Electric Company (October 2, 2025), ([Appendix 1](#)).

² San Diego Gas & Electric Company, 2024 VMA Corrective Action Plan (October 30, 2025), ([Appendix 2](#)).

1. INTRODUCTION

Pursuant to Public Utilities Code section 8386.3(b)(5)(A), the Office of Energy Infrastructure Safety (Energy Safety) may audit the vegetation management work performed by, or on behalf of, the electrical corporation following the end of the performance period. The Vegetation Management Audit (VMA) includes three phases:

1. **The audit.** The VMA identifies deficiencies in the electrical corporation's implementation of the vegetation management commitments in its WMP. Energy Safety provided the 2024 VMA to SDG&E on October 2nd, 2025, via electronic mail.³ The audit document is included in Appendix 1.
2. **The CAP.** Energy Safety then provides the electrical corporation time to respond to and develop corrective actions for any deficiency specified in the VMA and to provide this response in its CAP. The electrical corporation may provide supplemental data, additional supporting documentation, clarifying statements, and corrective actions for consideration by Energy Safety for use in its final determination of the electrical corporation's performance relative to its WMP vegetation management commitments. SDG&E provided its CAP to Energy Safety on October 30, 2025.⁴ SDG&E's CAP is included in Appendix 2.
3. **The audit report.** Energy Safety then reviews the CAP and issues a VMA Report to the electrical corporation identifying any outstanding deficiency in the electrical corporation's implementation of its vegetation management commitments in the WMP. The VMA Report is publicly available on Energy Safety's E-Filing System on the 2024 VM Audits Docket. The VMA and CAP (items 1 and 2 above) are included as appendices within the VMA Report. This VMA Report document concludes the VMA process for the 2024 performance year.

The VMA Report document is organized as follows:

- Section 2 includes a summary of the deficiencies identified during the VMA, SDG&E's CAP, and Energy Safety's final determination of outstanding deficiencies in SDG&E's implementation of or planned corrective actions for the 2024 WMP vegetation management commitments.

³ Office of Energy Infrastructure Safety, 2024 VMA of SDG&E (October 2, 2025), ([Appendix 1](#)).

⁴ San Diego Gas & Electric Company, 2024 VMA Corrective Action Plan (October 30, 2025), ([Appendix 2](#)).

- Section 3 includes a discussion of SDG&E’s vegetation management program maturity and programmatic performance relative to the achievement of the objectives of WMP in 2024.
- Section 4 is Energy Safety’s conclusion regarding SDG&E completion of all work associated with its WMP commitments and program performance for 2024.

2. SDG&E’S 2024 VMA FINDINGS

SDG&E’s 2023-2025 WMP identifies the objectives, preventative strategies, and programs that SDG&E has implemented to minimize the risk that its infrastructure will cause catastrophic wildfire. Energy Safety analyzed each of the 13 vegetation management initiatives listed in Section 8.2 (Vegetation Management and Inspections) of SDG&E’s 2023-2025 WMP⁵ as part of the VMA. Each initiative includes one or more commitments. These commitments include both quantitative targets (e.g., completion of a specified number of inspections) and narrative, but verifiable, statements (e.g., implementation of personnel training programs). Energy Safety identified the WMP quantitative commitments and narrative statements within each initiative and determined whether SDG&E had completed all work associated with each commitment in performance year 2024. Energy Safety’s determination of whether all work was complete was based on data and documentation submitted by SDG&E.

Energy Safety determined that an initiative was “complete” if SDG&E provided sufficient data or supporting information demonstrating completion of all commitments (targets and/or statements) within that initiative. If any commitment was incomplete or insufficiently documented, Energy Safety determined that the initiative was “deficient.”

Energy Safety’s VMA found that SDG&E provided data and documentation to support completion of work for eight of the 13 initiatives and did not provide information and documentation to support completion of work for five initiatives. Of the five initiatives identified in the VMA, SDG&E’s CAP either provided additional documentation to demonstrate that it completed the work or had begun to implement corrective actions to address two of the five deficient initiatives. As a result, Energy Safety concluded that SDG&E successfully achieved the objectives of 10 of the 13 vegetation management initiatives in its 2023-2025 WMP for performance year 2024. Energy Safety found that SDG&E has outstanding deficiencies in three vegetation management initiatives in its 2023-2025 WMP. These deficiencies are summarized in Table 1.

⁵ San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true), Published June 7, 2024, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true).

Table 1. Summary of SDG&E's outstanding deficiencies in performance year 2024.

Vegetation Management Initiative	Description of Deficiency
8.2.3.2 Wood and Slash Management	SDG&E did not meet its 2024 target to complete additional fuels management work, thinning ground vegetation within a 50-foot radius down to 30% cover, around 500 poles where pole brushing is required under Initiative 8.2.3.1 Pole Clearing; SDG&E provided data to support the additional clearing work around 147 poles. Additionally, SDG&E did not provide data to substantiate the removal of wood and slash debris at all work sites.
8.2.3.5 Substation Defensible Space	SDG&E did not meet its 2024 target to complete 384 substation inspections; SDG&E provided data to support completion of 379 substation inspections.
8.2.6 Open Work Orders	SDG&E did not meet its commitment to complete routine work and priority work within targeted time frames. SDG&E provided data to demonstrate 84% of routine work and 64% of priority work was completed within the target time frames.

2.1 WMP VM commitment assessment approach

The purpose of the VMA is to determine whether SDG&E performed all work related to commitments made in its WMP and identify any deficiencies in SDG&E's vegetation management programs that have the potential to increase wildfire ignition risk.

The VMA includes the following steps:

1. **Completion of Work-** Determination of whether the electrical corporation submitted sufficient documentation to demonstrate that it performed all work for each of the vegetation management commitments described in the WMP.

If the electrical corporation provided sufficient documentation demonstrating that all work was completed for all commitments within an initiative, Energy Safety concluded that the initiative is complete, and the analysis ended here. If the electrical corporation did not

provide sufficient documentation to conclude that all work was complete, then Energy Safety continued the analysis to include one or more of the following:

2. **Assessment of Constraints-** Energy Safety will review the documentation provided regarding constraints to determine acceptability and commitment to resolving constraints in a timely way.
3. **Corrective Actions-** Energy Safety reviewed the corrective actions proposed by the electrical corporation to determine if the proposed corrections will prevent future deficiencies and ensure that all commitments related to the initiative will be completed in future performance years.
4. **Achievement of Objective-** Determination of whether the electrical corporation's incomplete work has detracted from its ability to achieve the objective of the initiative after considering constraints and planned corrective actions.

2.2 Analysis of work commitments associated with 2024 VM Initiatives

SDG&E's 2024 VMA findings identified five initiatives for which SDG&E initially did not provide sufficient documentation to support that all work was completed. SDG&E was able to provide additional documentation and corrective actions in its CAP response to support completion of two of the five deficient initiatives that Energy Safety identified in the VMA and had outstanding deficiencies in three.

A summary of Energy Safety's VMA and VMA Report initiative findings are presented in Table 2. A finding of "Complete" for the VMA Report indicates that SDG&E provided additional documentation in its CAP to support that all work was completed. A finding of "Achieved Objective" indicates that, while Energy Safety identified some deficiencies, the majority of the work was completed and the CAP provided corrective actions that will address any remaining deficiencies. A finding of "Deficient" indicates that SDG&E did not complete all work and did not sufficiently address the deficiencies in its CAP. Energy Safety's analysis which resulted in these conclusions is described for each initiative below.

Table 2. Summary of Energy Safety's findings regarding completion of SDG&E's VM Initiatives in its 2023-2025 WMP for performance year 2024. Initiatives in bold were found deficient in VMA.

Vegetation Management Initiative	VMA Finding	VMA Report Finding
8.2.2. Vegetation Management Inspections	Complete	Complete
8.2.3.1 Pole Clearing	Complete	Complete
8.2.3.2 Wood and Slash Management	Deficient	Deficient
8.2.3.3 Clearance	Complete	Complete
8.2.3.4 Fall-In Mitigation	Deficient	Complete
8.2.3.5 Substation Defensible Space	Deficient	Deficient
8.2.3.6 High-Risk Species	Complete	Complete
8.2.3.7 Fire Resilient Right-of-Ways	Complete	Complete
8.2.3.8 Emergency Response of Vegetation Management	Complete	Complete
8.2.4 Vegetation Management Enterprise System	Complete	Complete
8.2.5. Quality Assurance and Quality Control	Deficient	Achieved Objective
8.2.6 Open Work Orders	Deficient	Deficient
8.2.7 Workforce Planning	Complete	Complete

VMA Finding 1— 8.2.3.2 Wood and Slash Management

The purpose of this initiative is to take actions “to manage all downed wood and “slash” generated from vegetation management activities.”⁶

Summary of Initiative Work Commitments and Identified Deficiencies

SDG&E did not provide sufficient documentation to support completion of its fuels management and wood and slash debris management commitments in its WMP under Initiative 8.2.3.2 Wood and Slash Management.

Fuels Management. In its 2023-2025 WMP, SDG&E committed to performing additional fuels management work, thinning ground vegetation within a 50 foot radius down to 30 percent vegetation cover, around 500 poles in the HFTD where SDG&E identified an increased risk of ignition and propagation in 2024.⁷ During Energy Safety’s VMA, SDG&E provided documentation demonstrating it completed the additional fuels vegetation management work around 147 poles in 2024, 353 poles short of its target.⁸

Wood and Slash Debris Management. In its 2023-2025 WMP, SDG&E committed to chipping and removing wood and slash debris generated from vegetation management work from all work sites.⁹ SDG&E provided documentation demonstrating that it completed tree trims or removals, but it did not demonstrate that wood and slash was removed from sites where tree work was completed.¹⁰ SDG&E provided documentation demonstrating that wood and slash were removed from specific properties; however, these wood and slash removals could not be tied to the documented vegetation management work.¹¹

SDG&E’s CAP Response

Fuels Management. In its CAP, SDG&E stated that it submitted a petition to amend its WMP on April 10, 2025, to reduce its fuels management target from 500 poles to 150 poles.¹² SDG&E stated this amendment was requested due to internal executive strategic decisions to find

⁶ Office of Energy Infrastructure Safety, [2023-2025 Base Wildfire Mitigation Plan Technical Guidelines](#), Published December 6, 2022, p. A-24, URL:

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

⁷ San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 257, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true>).

⁸ Office of Energy Infrastructure Safety, 2024 VMA of SDG&E (October 2, 2025), ([Appendix 1](#)), p. A-21.

⁹ San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 274, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true>).

¹⁰ Office of Energy Infrastructure Safety, 2024 VMA of SDG&E (October 2, 2025), ([Appendix 1](#)), p. A-22.

¹¹ Office of Energy Infrastructure Safety, 2024 VMA of SDG&E (October 2, 2025), ([Appendix 1](#)), p. A-22.

¹² San Diego Gas & Electric Company, [San Diego Gas & Electric 2025 Petition to Amend](#), Published April 10, 2025, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58234&shareable=true>).

cost efficiencies without increasing wildfire risk, consider affordability measures, and align with the pending General Rate Case (GRC) Settlement Agreement.¹³

Additionally, SDG&E noted:

“Because poles in the service territory are still maintained under the Pole Clearing activity as required under PRC§4292, risks for pausing the Fuels Management Program were considered low.”¹⁴

Energy Safety denied SDG&E’s amendment request on July 11, 2025, stating that “SDG&E did not show good cause for the amendments requested in the petition” and that “the performance period had elapsed.”¹⁵ SDG&E acknowledged that it did not complete the work identified in this target. Additionally, SDG&E stated that it incorporated 500 poles into its 2025 workplans and therefore expects to meet the target in 2025.

Wood and Slash Management. In its CAP, SDG&E stated that it does not record completion of wood and slash debris removal at the tree-level. SDG&E stated that according to SDG&E’s 2023-2025 WMP, it is standard operating protocol to remove all wood and slash debris associated with tree operations except for large, woody material,¹⁶ which is cut into manageable lengths for customer use or disposal. SDG&E stated that while it did not record the removal of woody debris after vegetation management work, these terms are included in SDG&E’s agreements with tree trimming vendors.¹⁷

As a corrective action, SDG&E committed to creating a new attribute field within its electronic work management system, to document the completion of wood and slash removal.¹⁸ The new field is a binary (yes/no) question regarding whether wood/debris was removed from the site. SDG&E stated that this new documentation process was implemented in August 2025.¹⁹

Analysis of SDG&E Performance with the Vegetation Management 2023-2025 WMP Initiative

The improper management of wood and slash debris could create an unnecessary increase of ground fuels which could exacerbate wildfire spread. Therefore, it is critical for SDG&E to keep accurate records of all wood and slash management work. Because SDG&E could not

¹³ San Diego Gas & Electric Company, 2024 VMA CAP (October 30, 2025), ([Appendix 2](#)), p. 4.

¹⁴ San Diego Gas & Electric Company, 2024 VMA CAP (October 30, 2025), ([Appendix 2](#)), p. 4.

¹⁵ Office of Energy Infrastructure Safety, [Decision for SDG&E’s 2025 Petition to Amend](#), Published July 11, 2025, p.4, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58911&shareable=true>).

¹⁶ San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 274, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true>).

¹⁷ San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 257, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true>).

¹⁸ San Diego Gas & Electric Company, 2024 VMA CAP (October 30, 2025), ([Appendix 2](#)), p. 5.

¹⁹ San Diego Gas & Electric Company, 2024 VMA CAP (October 30, 2025), ([Appendix 2](#)), p. 5.

demonstrate that it met its Fuels Management target or that it tracked its wood and slash removal activities, Energy Safety initially found Initiative 8.2.3.2 Wood and Slash Management deficient.

In its CAP, SDG&E stated it reduced work towards its fuels management target without receiving approval from Energy Safety. SDG&E did not dispute that it did not meet its 2024 Fuels Management target and stated that it incorporated 500 poles of additional fuels management work into its 2025 work plan and is on track to meet this target in 2025. Energy Safety will continue to monitor this commitment in 2025.

SDG&E also stated that its standard operating procedures and vendor contracts require proper disposal of wood and slash from vegetation management work but acknowledged that this work is not recorded in its work management systems and therefore cannot be verified. As a corrective action, SDG&E began to document wood and slash removal in August 2025. While the new attribute in its vegetation management enterprise system will provide records of wood and slash removal, it does not satisfy the requirements prescribed by the Data Guidelines in section 3.6.3.6 Vegetation Management Projects which require electrical corporations to document how brush or slash generated by vegetation management projects is treated as well as the destination of wood boles greater than 6 inches.²⁰ Therefore, the binary field proposed by SDG&E is insufficient.

Initiative Level Determination

The objective of this initiative is “to manage all downed wood and ‘slash’ generated from vegetation management activities.”²¹ SDG&E did not meet its target to remove fuels around 500 poles and did not provide sufficient documentation to demonstrate that it removed all wood and slash from vegetation management mitigation sites in 2024.

Regarding its fuels management target, SDG&E has incorporated 500 poles of fuels management work into its 2025 workplan and has stated it is on track to complete this target next performance year. SDG&E has also implemented a new field in its work management system to track wood and slash removal from work sites in 2025, but as described, this new field is insufficient to fully comply with the Data Guidelines because it does not track how the debris was treated nor its destination.

Therefore, Initiative 8.2.3.2 Vegetation and Fuels Management – Wood and Slash Debris has outstanding deficiencies in performance year 2024. Energy Safety will evaluate whether the corrective actions described in its CAP were successfully implemented during the 2025 VMA.

²⁰ Office of Energy Infrastructure Safety, [Data Guidelines v4.1](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59967&shareable=true), Adopted December 22, 2025, p. 92-108, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59967&shareable=true)

²¹ Office of Energy Infrastructure Safety, [2023-2025 Base Wildfire Mitigation Plan Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true), Published December 6, 2022, p. A-24, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

VMA Finding 2— 8.2.3.4 Fall-In Mitigation

The purpose of this initiative is to take actions “to identify and remove or otherwise remediate trees that pose a high risk of failure or fracture that could potentially strike electrical equipment.”²²

Summary of Initiative Work Commitments and Identified Deficiencies

SDG&E did not provide sufficient documentation that all work was completed for Initiative 8.2.3.4 Fall-in Mitigation.

In its 2023-2025 WMP, SDG&E committed to completing all fall-in mitigation work prescribed during detailed inspections and off-cycle patrol inspections.²³ SDG&E provided documentation describing its inspections and subsequent mitigation activities in 2024 for its detailed inspections program and its off-cycle patrol program. The documentation demonstrated that while SDG&E completed all mitigations prescribed during its off-cycle patrol inspections, it did not complete all mitigations prescribed during detailed inspections.²⁴

SDG&E’s CAP Response

In its CAP, SDG&E stated that some detailed inspections for which mitigation work was initially prescribed did not require work after further review and therefore had no work completion date. SDG&E clarified that, in the documentation submitted to Energy Safety for the VMA, it did not differentiate between mitigations that were completed and those for which follow up inspections demonstrated that the site did not require work.²⁵ In a follow up meeting, SDG&E provided clarifications regarding its work prescription recordkeeping procedures and committed to providing additional information to make these clarifications apparent in future data submissions.²⁶

SDG&E provided updated documentation that identified an additional 823 tree units, or 724 tree IDs, that were not complete in the information submitted during the VMA but for which SDG&E has since completed all prescribed mitigation work. With this new information, SDG&E has demonstrated that it has completed mitigation work for all but 185 tree units, or 181 tree

²² Office of Energy Infrastructure Safety, [2023-2025 Base Wildfire Mitigation Plan Technical Guidelines](#), Published December 6, 2022, p. A-24, URL:

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

²³ San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 277 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true>).

²⁴ Office of Energy Infrastructure Safety, 2024 VMA of SDG&E Utilities (October 2, 2025), ([Appendix 1](#)), p. A-26-27.

²⁵ San Diego Gas & Electric Company, 2024 VMA CAP (October 30, 2025), ([Appendix 2](#)), p. 6-7.

²⁶ Personal Communication. Meeting between Energy Safety and San Diego Gas & Electric Company, February 13, 2026.

IDs, of the prescribed mitigations.²⁷ Of these incomplete mitigations, 147 tree units were constrained due to work exceptions and 38 tree units due to customer refusals. SDG&E stated, work “exceptions are mitigations that were deferred because of environmental restrictions, permitting, or access.”²⁸

As a corrective action, SDG&E stated they will “establish a method of tracking and validating the completion of all mitigations to include deferred work (customer refusals and exceptions) to ensure a timely and complete follow-up. Additionally, for future data request responses, SDG&E will modify its data extraction methodology and description of its data to ensure requisite detail and description to avoid confusion or miscommunication.”²⁹

Analysis of SDG&E’s Performance with the Vegetation Management Performance 2023-2025 WMP Initiative

Timely mitigation of vegetation hazards identified during inspections is the cornerstone of electrical utility wildfire risk management. The VMA found that because SDG&E did not demonstrate that it completed all mitigation work prescribed during inspections, Initiative 8.2.3.4 Fall-In Mitigation was deficient.

In its CAP, SDG&E provided additional documentation containing updated data for work prescribed,³⁰ as well as resolution of constraints and work completion dates³¹ associated with its detailed inspection program. Based on this information, SDG&E demonstrated it managed >99% (67,802 out of 67,839) of mitigations where work was prescribed during detailed inspections. Of the work SDG&E managed, 92% (62,550 out of 67,839) of mitigations were completed and 8% (5,252 out of 67,839) were found to not require work after a follow up inspection. As of January 30, 2026, <1% (37 out of 67,839) of the mitigations, remain incomplete but constrained.

While SDG&E’s 2023-2025 WMP does not include timeframes to resolve constraints, Energy Safety evaluated the time it took to resolve constrained work and the procedures used to resolve constraints because unmitigated vegetation hazards put undue risk on SDG&E’s system. SDG&E provided documentation demonstrating work was constrained for 181 mitigations.³² SDG&E resolved work constraints for 144 of these mitigations, taking 578 days

²⁷ San Diego Gas & Electric Company, 2024 VMA CAP, 8.2.3.4 Fall-In Mitigation; attachment: “SDG&E_2024_VM_Audit_CAP_WMP.8.2.3.4_Attachment1.xlsx.”

²⁸ San Diego Gas & Electric Company, 2024 VMA CAP (October 30, 2025), ([Appendix 2](#)), p. 7.

²⁹ San Diego Gas & Electric Company, 2024 VMA CAP (October 30, 2025), ([Appendix 2](#)), p. 7.

³⁰ San Diego Gas & Electric Company, 2024 VMA CAP (October 30, 2025), attachment: “SDG&E_2024_VM_Audit_CAP_WMP.8.2.3.4_Attachment1.xlsx.”

³¹ Data Request OEIS-E-SVM_2026 SDG&E-001, Question 2; attachment: “OEIS-E-SVM_2026-SDG&E-001_Q2_Part2.xlsx.”

³² Data Request OEIS-E-SVM_2026 SDG&E-001, Question 2; attachment: “OEIS-E-SVM_2026-SDG&E-001_Q2_Part2.xlsx.”

on average. The remaining 37 constrained mitigations have been constrained for an average of 541 days as of January 30, 2026.

SDG&E also provided its internal procedures used to track and resolve work constraints.³³ SDG&E stated that Vegetation Management tracks the status and progress of “deferred work” due to constraints through reports and dashboards within its work management database. Customer refusals were first encountered when the tree contractor notified the customer of required work. Some customer refusals may undergo a series of internal escalations if the constraint remains unresolved, with the highest level of escalation including a certified letter to the customer and either a law enforcement escort or SDG&E Corporate Security escort to access the property.³⁴ Work exceptions include environmental constraints, such as bird nesting season, species-related restrictions, or land agency requirements, and permitting delays that may result in a delays for an extended period of time. To resolve environmental constraints, SDG&E stated that its Vegetation Management team works with its Environmental Services Department to review the impact of work activities on protected species. To resolve constraints due to permitting, SDG&E coordinates with its permits department or other associated departments to process permit requests. SDG&E stated that its Habitat Conservation Plan Amendment offers further information regarding associated rules and regulations that may impact its vegetation management work as well as procedures SDG&E implements to minimize disturbances to habitats and streamline environmental and permitting constraints.³⁵

Table 3. Summary of SDG&E's mitigation prescriptions from detailed inspections and the respective completion rates.

Mitigation Type	Mitigations Prescribed	Mitigations Completed		'No Work Required' Mitigations		Constrained Mitigations	
Total Prunes	67,062	61,820	92.2%	5,205	8.4%	37	0.1%
Total Removals	777	730	94.0%	47	6.0%	0	0.0%
Total	67,839	62,550	92.2%	5,252	7.7%	37	0.1%

Initiative Level Determination

SDG&E submitted documentation demonstrating that it completed all prescribed mitigations from detailed inspections that were not constrained, described its methods to track constrained work, and has procedures in place to mitigate and resolve work constraints. Therefore, Energy Safety concluded that SDG&E met the objective of this initiative to identify

³³ Data Request OEIS-E-SVM_2026-SDG&E-001, Question 2; Response 2.

³⁴ Data Request OEIS-E-SVM_2026-SDG&E-001, Question 2; Response 2.

³⁵ San Diego Gas & Electric Company, [Habitat Conservation Plan Amendment](https://www.sdge.com/sites/default/files/environmental%20assessment%20for%20Habitat%20Conservation%20Plan%20Amendment.pdf), Published August 2023, URL: (https://www.sdge.com/sites/default/files/environmental%20assessment%20for%20Habitat%20Conservation%20Plan%20Amendment.pdf).

and remove or remediate trees that pose a high risk of failure or fracture that could potentially strike electrical equipment and there are no outstanding deficiencies related to Initiative 8.2.3.4 Fall-in Mitigation.

VMA Finding 3— 8.2.3.5 Substation Defensible Space

The purpose of this initiative is to take actions “to reduce ignition probability and wildfire consequence due to contact with substation equipment.”³⁶

Summary of Initiative Work Commitments and Identified Deficiencies

SDG&E did not provide sufficient documentation to demonstrate that all work was completed for Initiative 8.2.3.5 Substation Defensible Space.

In its 2023-2025 WMP, SDG&E committed to completing 384 substation patrol inspections in 2024.³⁷ SDG&E provided documentation demonstrating that it performed a total of 379 substation inspections, at 47 out of 158 substations in its service territory.³⁸ The documentation also indicated that SDG&E assigned and completed 11 instances of weed control based on these inspections. Therefore, SDG&E did not meet its target for this initiative.

SDG&E’s CAP Response

In its CAP, SDG&E stated that the shortfall of five inspections was attributed to the decommissioning of two substations following the development of the forecast in 2023.³⁹ Further, the shortfall can be attributed to shifting inspection frequencies between monthly and bi-monthly intervals based on established maintenance practices.

Additionally, SDG&E stated that “SDG&E considers work to be substantially complete when performance is within 10% of the established target and the intended risk reduction is achieved. For substation inspections, SDG&E does not provide a specific risk assessment in the Wildfire Mitigation Plan (WMP), therefore, SDG&E considers the inspection program to have met its intended purpose.”⁴⁰

³⁶ Office of Energy Infrastructure Safety, [2023-2025 Base Wildfire Mitigation Plan Technical Guidelines](#), Published December 6, 2022, p. A-24, URL:

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

³⁷ San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 146 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true>).

³⁸ Office of Energy Infrastructure Safety, 2024 VMA of SDG&E Utilities (October 2, 2025), ([Appendix 1](#)), p. A-28-29.

³⁹ San Diego Gas & Electric Company, 2024 VMA CAP (October 30, 2025), ([Appendix 2](#)), p. 7.

⁴⁰ San Diego Gas & Electric Company, 2024 VMA CAP (October 30, 2025), ([Appendix 2](#)), p. 7-8.

Analysis of SDG&E's Performance with the Vegetation Management Performance 2023-2025 WMP Initiative

Because SDG&E did not provide sufficient documentation to demonstrate that it completed all substation inspections, Energy Safety initially determined that Initiative 8.2.3.5 Substation Defensible Space was deficient.

SDG&E did not dispute that it did not meet its Substation Patrol Inspections target of 384 substation inspections. In its CAP response, SDG&E attributed the shortfall of substation inspections to the decommissioning of two substations and shifts in inspection frequencies based on established maintenance practices. However, based on the documentation SDG&E provided, several substations did not receive all of the inspections⁴¹ that SDG&E committed to in its 2023-2025 WMP.⁴² The missed inspections were scheduled for the months of October, November, and December, showing a decrease in inspection work towards the end of the year. Taking into account the two substations that were decommissioned in 2024, SDG&E did not complete all substation inspections in 2024.

Initiative Level Determination

SDG&E did not provide sufficient documentation to demonstrate that it achieved the objective of the Initiative 8.2.3.5 Vegetation and Fuels Management – Substation Defensible Space because it did not complete designated inspections on the risk-informed frequencies designated in its WMP. In SDG&E's 2023-2025 WMP, SDG&E set a target of completing 384 substation inspection in 2024,⁴³ but only provided documentation substantiating completion of 379 inspections. In its CAP, SDG&E did not demonstrate that its substation inspection target was met, did not provide sufficient justifications for why the inspections were not required (other than the 2 substations that were decommissioned), and did not provide corrective actions to ensure the target will be met in future years. Therefore, Initiative 8.2.3.5 Vegetation and Fuels Management – Substation Defensible Space has outstanding deficiencies.

VMA Finding 4— 8.2.5 Quality Assurance and Quality Control

The purpose of this initiative is the “[e]stablishment and function of audit process to manage and confirm work completed by employees or contractors, including packaging QA/QC

⁴¹ Data Request OEIS-E-SVM_2025-SDG&E-001, Question 22; attachment: “SVM_2025-SDGE-001_Q2_Q22.xlsx.”

⁴² San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true), Published June 7, 2024, p. 209 URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true).

⁴³ San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true), Published June 7, 2024, p. 274 URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true).

information for input to decision-making and related integrated workforce management processes.”⁴⁴

Summary of Initiative Work Commitments and Identified Deficiencies

Energy Safety assessed WMP commitments related to the percentage of its vegetation work audited for QA/QC and target pass rates for five programs (Pre-inspection, Tree Trimming, Pole Clearing, Off-cycle HFTD Trims, and “Memo” Trims) under SDG&E’s 8.2.5 Quality Assurance Initiative. The information provided by SDG&E indicated that all work was completed for its pole clearing audit program, but deficiencies were identified in the other four programs.

Pre-Inspection Audit Activities. SDG&E committed to achieving a QA/QC sampling target of 12 to 15 percent of all pre-inspection work completed in 2024, with a 95% target pass rate.⁴⁵ SDG&E provided documentation demonstrating it met its sample size goal by auditing 96% (85,159 out of 88,482) of clearance work following routine pre-inspections, but did not meet its target pass rate goal because 94% (80,371 out of 85,159) of tree units audited passed.⁴⁶

Tree Trimming Audit Activities. SDG&E committed to achieving a QA/QC sampling target of 12 to 15 percent of all tree trimming work completed in 2024, with a target pass rate of 95%.⁴⁷ SDG&E provided documentation demonstrating it met its sample size goal by auditing by auditing 23% (40,227 out of 173,857) of tree units that received clearance work following clearance inspections, but did not meet its target pass rate goal because 94% (37,537 out of 40,227) of tree units passed the audit.⁴⁸

Off-Cycle HFTD Trim Audit Activities. SDG&E committed to auditing 100 percent of all tree units trimmed or removed in HFTDs as part of the off-cycle, HFTD patrols in 2024, with a target pass rate of 95%.⁴⁹ SDG&E provided documentation demonstrating that it did not meet its sample size goal because 99% (1,422 out of 1,431) of tree units trimmed or removed in HFTDs as a part of the off-cycle patrols received a QA/QC audit, but did meet its target pass rate because 99% (1,418 out of 1,422) of tree units audited passed.⁵⁰

⁴⁴ Office of Energy Infrastructure Safety, [2023-2025 Base Wildfire Mitigation Plan Technical Guidelines](#), Published December 6, 2022, p. A-24, URL:

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

⁴⁵ San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 283 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true>).

⁴⁶ Office of Energy Infrastructure Safety, 2024 VMA of SDG&E Utilities (October 2, 2025), ([Appendix 1](#)), p. A-36-38.

⁴⁷ San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 283 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true>).

⁴⁸ Office of Energy Infrastructure Safety, 2024 VMA of SDG&E Utilities (October 2, 2025), ([Appendix 1](#)), p. A-36-39.

⁴⁹ San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 283 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true>).

⁵⁰ Office of Energy Infrastructure Safety, 2024 VMA of SDG&E Utilities (October 2, 2025), ([Appendix 1](#)), p. A-36-41.

Tree Trim “Memo” Work Audit Activities. SDG&E committed to a QA/QC sampling target of 100 percent of all tree trim “Memo” work orders, with a 95% target pass rate for its QA/QC inspections.⁵¹ SDG&E provided documentation demonstrating it did not meet its sample size target because 92% (1,924 out of 2,082) of tree trim “Memo” work orders received a QA/QC audit, but did meet its pass rate target because 96% (1,847 out of 1,924) of “Memo” work orders audited passed.⁵²

SDG&E’s CAP Response

In its CAP, SDG&E acknowledged that it did not meet its pass rate goals for pre-inspection audit activities and tree trimming work activities and did not meet its sample size goals for off-cycle HFTD trims and “Memo” work trim audit activities.⁵³ However, SDG&E believes that it achieved the objectives of its QA/QC programs because it fell short of its pass rate goals by 1% and its sample size program goals by 1% and 8% respectively. As a corrective action, SDG&E stated that it will track and monitor the pass rates on a consistent basis throughout the performance year to manage contractor performance to ensure SDG&E meets its target pass rate goal by the end of the calendar year. SDG&E has also implemented method of tracking the completion of all work associated with off-cycle HFTD and “Memo” work and the respective QA/QC work orders in 2025.

Analysis of SDG&E’s Performance with the Vegetation Management Performance 2023-2025 WMP Initiative

Meeting QA/QC sample size and pass rate goals provides assurance that vegetation management activities are implemented as intended and that work practices are effectively mitigating ignition risk across SDG&E’s system. Because SDG&E did not achieve all of the sample size and pass rate goals included in its 2023–2025 WMP, SDG&E did not complete all work associated with its WMP commitments. Accordingly, Energy Safety initially found Initiative 8.2.5 Quality Assurance and Quality Control to be deficient.

SDG&E detailed its procedures to remediate trees that fail pre-inspection and tree trim audits. SDG&E stated that failed pre-inspection audits receive corrective actions by the auditor when the failure is discovered.⁵⁴ For failed tree trim audits, follow-on corrective work orders are submitted to the pruning contractor to remediate the failed work. SDG&E provided documentation demonstrating that 2,264 of the 2,498 trees that failed its tree trim audit received corrective actions.⁵⁵ Of the remaining 234 trees, 175 trees did not require corrective

⁵¹ San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 283 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true>).

⁵² Office of Energy Infrastructure Safety, 2024 VMA of SDG&E Utilities (October 2, 2025), ([Appendix 1](#)), p. A-36-41.

⁵³ San Diego Gas & Electric Company, 2024 VMA CAP (October 30, 2025), ([Appendix 2](#)), p. 8.

⁵⁴ Data Request OEIS-E-SVM_2026-SDG&E-001, Question 4; Response 4.

⁵⁵ Data Request OEIS-E-SVM_2026-SDG&E-001, Question 4; attachment: “OEIS-E-SVM_2026-SDGE-001_Q4.xlsx.”

actions (documentation errors or poor cleanup practices) and 59 trees did not receive any corrective actions.⁵⁶ SDG&E stated that reasons why trees still required corrective actions included subsequent re-audits that reversed the failed code, the trees were cleared during subsequent detailed inspections, and customer refusals.⁵⁷

Regarding the nine trees that received work generated from off-cycle HFTD inspections but did not receive a QA/QC audit, SDG&E provided justifications for deferring the work of six trees and updated audit dates for three trees, accounting for the nine tree deficit identified in the VMA.⁵⁸ The six trees with deferred work during the time of the HFTD off-cycle patrol audit were not included within the audit population and did not count towards the target completion. Therefore, SDG&E demonstrated it completed audits for 100% prescribed mitigations.

Lastly, while SDG&E did not fully sample its tree trim “Memo” work, it fell short of full compliance by 8% of work orders and exceeded pass rate goals for the work that was audited. As noted in their CAP, SDG&E completed the majority of work associated with its QA/QC program in 2024 and SDG&E provided and implemented corrective actions in 2025 to meet these goals in future years.

Initiative Level Determination

SDG&E provided documentation demonstrating that it used the information identified in its QA/QC program to correct mitigations that failed its audit. Energy Safety concluded that SDG&E implemented a successful QA/QC program in 2024 which supported the objective of Initiative 8.2.5 Quality Assurance and Quality Control. While some pass rate and sample size targets were not fully achieved in 2024, the shortcomings were minor and SDG&E has planned corrective actions which will improve performance in future years.

Given the information in the CAP response, Energy Safety determined that SDG&E’s performance for Initiative 8.2.5, Quality Assurance and Quality Control, is not deficient. Energy Safety will continue to monitor pass rates in future performance years to ensure that corrective actions are adopted.

⁵⁶ Data Request OEIS-E-SVM_2026-SDG&E-001, Question 4; attachment: “OEIS-E-SVM_2026-SDGE-001_Q4.xlsx.”

⁵⁷ Data Request OEIS-E-SVM_2026-SDG&E-001, Question 4; Response 4.

⁵⁸ Data Request OEIS-E-SVM_2026-SDG&E-001, Question 5; attachment: “OEIS-E-SVM_2026-SDGE-001_Q5.xlsx.”

VMA Finding 5— 8.2.6 Open Work Orders

The purpose of this initiative is to take actions “to manage the electrical corporation’s open work orders resulting from inspections that prescribe vegetation management activities.”⁵⁹

Summary of Initiative Work Commitments and Identified Deficiencies

SDG&E did not provide sufficient documentation to demonstrate that all work associated with Initiative 8.2.6 Open Work Orders was complete.

SDG&E committed to completing routine work and priority work within 120 days and 30 days after inspection, respectively.⁶⁰ SDG&E provided documentation demonstrating that 115,930 total work orders were issued in performance year 2024.⁶¹ Of these work orders, 97% (112,770 out of 115,930) were routine work orders and 3% (3,160 out of 115,930) were priority work orders. For routine work orders, 17% were completed more than 120 days after inspection and SDG&E did not provide a reason for the delay in 97% of the cases. For priority work orders, 38% were completed more than 30 days after inspection and SDG&E did not provide a reason for the delay in 93% of cases.⁶²

SDG&E’s CAP Response

In its CAP, SDG&E stated that SDG&E met both the “spirit and technical statements in its WMP.”⁶³ “SDG&E’s Vegetation Master Schedule is structured to provide a reasonable time-period to complete each activity annually within all VMAs that comprise the service territory.”⁶⁴ SDG&E stated the ability to complete the work within the timeframe can be influenced by several factors including but not limited to customer refusals, environmental review and restrictions, property access restrictions, external agency review, permit application, tree contractor schedule fluctuations, etc. Further, SDG&E stated that fluctuations of tree contractors workload and crew resources may delay work completion. Because of these external factors, SDG&E’s work schedules are generalized, rather than mandatory.

SDG&E stated that it “endeavors to anticipate schedule delays where feasible through internal planning and scheduling by the SDG&E Area Foresters who manage the work. Efforts SDG&E has implemented to prevent unnecessary delays may include proactive engagement

⁵⁹ Office of Energy Infrastructure Safety, [2023-2025 Base Wildfire Mitigation Plan Technical Guidelines](#), Published December 6, 2022, p. A-24, URL:

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

⁶⁰ San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 285 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true>).

⁶¹ Office of Energy Infrastructure Safety, 2024 VMA of SDG&E Utilities (October 2, 2025), ([Appendix 1](#)), p. A-42-43.

⁶² Office of Energy Infrastructure Safety, 2024 VMA of SDG&E Utilities (October 2, 2025), ([Appendix 1](#)), p. A-42-43.

⁶³ San Diego Gas & Electric, 2024 VMA CAP (October 30, 2025), ([Appendix 2](#)), p. 9.

⁶⁴ San Diego Gas & Electric, 2024 VMA CAP (October 30, 2025), ([Appendix 2](#)), p. 9.

with customers, recurring status meetings with tree contractors to manage crew resource levels and assignments, fostering positive work relationships with external stakeholders (e.g., cities agencies, tribes, etc.), early permit initiation, and scheduling work outside bird nesting season.”⁶⁵

SDG&E stated that its process of prioritizing work focuses on urgency and enables the timely completion of mitigations with the riskiest conditions. Mitigations with the most urgent conditions are completed either the same day or within 24 hours of inspections. Additionally, SDG&E stated that redundancy between detailed, off-cycle, targeted, and post-trim inspections allow multiple opportunities to identify and respond to risk conditions.

As a corrective action, SDG&E will improve the tracking and monitoring of delayed work by “creating a work schedule dashboard (completed in early 2025), recurring and targeted meetings with the tree contractors to review status of all pending tree work and crew resource allocation, early planning and coordination of work requiring environmental review or permitting, and proactive communication with historic refusal customers.”⁶⁶

Analysis of SDG&E’s Performance with the Vegetation Management Performance 2023-2025 WMP Initiative

The objective of Initiative 8.2.6 Open Work Orders is to manage open vegetation-management work orders identified through inspection activities. Because SDG&E did not provide documentation to support that it completed all of its work orders within the risk-based timeframes described in its WMP, Energy Safety initially found Initiative 8.2.6 Open Work Orders deficient.

SDG&E provided additional documentation in its CAP demonstrating that it ultimately completed all priority and routine work vegetation management work orders created in 2024 but failed to complete them within their respective timeframes. Accounting for work with documented constraints, SDG&E completed 64% of priority work orders and 84% of routine work orders within their respective timeframes. Priority work that was delayed without documented constraints was delayed for an average of 47 days, with a median of 42 days. Routine work that was delayed without documented constraints was delayed for an average of 144 days, with a median of 141 days.

SDG&E has implemented a variety of corrective actions to ensure that work will be completed in a timely manner. To track and monitor the completion of work, in 2025 SDG&E implemented a work scheduling dashboard to actively monitor delayed work orders. Additionally, SDG&E will hold recurring meetings with tree contractors to discuss all pending

⁶⁵ San Diego Gas & Electric Company, 2024 VMA CAP (October 30, 2025), ([Appendix 2](#)), p. 9.

⁶⁶ San Diego Gas & Electric Company, 2024 VMA CAP (October 30, 2025), ([Appendix 2](#)), p. 10.

tree work and crew resource allocations. Lastly, SDG&E stated that they will take early and proactive actions for work in areas with historical customer refusals and work exceptions.

Initiative Level Determination

In SDG&E's 2023-2025 WMP, SDG&E committed to completing routine work and priority work within 120 days and 30 days after inspection, respectively.⁶⁷ However, SDG&E provided documentation substantiating 84% of routine work orders and 64% of priority work orders were completed within their respective timeframes. While SDG&E provided corrective actions to ensure timely completion of its routine and priority work in the future, it has outstanding deficiencies in tracking and resolving constraints to allow for work to be completed within risk-based timeframes. This deficiency detracted from SDG&E's ability to mitigate wildfire risk. Therefore, Initiative 8.2.6 Open Work Orders has outstanding deficiencies.

⁶⁷ San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true), Published June 7, 2024, p. 285
URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true>).

3. SDG&E's 2024 VM PROGRAMMATIC PERFORMANCE ASSESSMENT

3.1 Performance Assessment of SDG&E's VM Program

The programmatic assessment is an evaluation of SDG&E's VM program maturity. Energy Safety considers SDG&E's year-over-year progress in achieving VM objectives, and whether it has implemented the corrective actions as described in CAP responses from previous performance periods. Energy Safety also evaluates the totality of the vegetation management work and initiative level analysis conclusions to determine whether SDG&E has completed sufficient work in all initiatives within its vegetation management program to meet the stated objectives of the WMP and minimize the risk of catastrophic wildfire posed by electrical lines and equipment.

3.2 2024 VM Programmatic Level Performance Analysis

Energy Safety's VMA, dated October 2, 2025, found that SDG&E completed all work in eight of the 13 initiatives in its 2023-2025 WMP and was deficient in five initiatives. SDG&E's CAP, dated October 30, 2025, provided additional information which demonstrated that either SDG&E performed the work or provided corrective actions to attempt to address the deficiency. SDG&E has also implemented corrective actions committed to in previous audit cycles and has engaged in open dialog with Energy Safety on procedural and recordkeeping improvements, which demonstrated its commitment to mature its VM programs. However, while Energy Safety has noted improvements to SDG&E's vegetation management programs, it did not provide sufficient documentation demonstrating it performed all work or did not provide sufficient corrective actions to address deficiencies in three initiatives: 8.2.3.2 Wood and Slash Management, 8.2.3.5 Substation Defensible Space, and 8.2.6 Open Work Orders.

Two of the deficiencies identified in performance year 2024 have been identified as performance issues in previous vegetation management audits and SDG&E has begun to take actions to improve performance. First, as discussed in Section 2, Energy Safety found that SDG&E did not accurately track its wood and slash removal from work sites in 2024. This was previously identified as an issue in 2023, wherein SDG&E did not establish that it performed all the work required by the wood and slash debris commitment because of recordkeeping issues. In its 2023 CAP response, SDG&E indicated that it would explore improvements to its

vegetation management system to document wood and slash removal. In its 2024 CAP, SDG&E indicated that it has created an additional field in its electronic work management system to record wood and slash debris removal. This action demonstrated that SDG&E has been maturing its VM programs in response to feedback provided in previous audit cycles. However, Energy Safety has identified a shortcoming in the corrective action because the new field is binary and only records whether debris was left on site. Therefore, SDG&E has implemented actions to improve performance, but the new field would not satisfy the data submission requirements in the Data Guidelines, which require a description of how the debris was treated and where it was sent following removal. SDG&E has committed to working towards a solution to satisfy the requirements of the data guidelines.⁶⁸

Second, Energy Safety identified year-over-year performance issues in SDG&E's open work orders program in 2023 and 2024. In its 2023 CAP, SDG&E committed to modifying how delayed work is monitored, tracked, and reported by regularly meeting with tree contractors to review current and pending work, proactively coordinating work in areas which have historically experienced constraints such as customer refusals and environmental review, and working with its tree contractors to ensure proper crew allocations throughout the year. SDG&E gave similar corrective actions in its 2024 CAP and stated that it has implemented a work schedule dashboard in 2025. This demonstrates SDG&E has begun the implementation of corrective actions it committed to in the previous audit cycles. Energy Safety will continue to monitor progress SDG&E makes towards its performance deficiencies regarding the open work order program in future performance years.

In addition to corrective actions taken in response to deficiencies identified in the 2024 VMA, SDG&E has also demonstrated programmatic maturity in two initiatives through implementation of corrective actions from previous audit cycles which had positive impacts on performance. First, SDG&E has improved its recordkeeping related to its target species patrol program in 2023. In its 2023 CAP, SDG&E clarified that inspection work orders were missing because work orders are only generated if corrective work is prescribed for the target species. In 2024, SDG&E provided improved documentation regarding its targeted species patrols and committed to continued clarification on how it records and tracks high-risk species as part of the target species patrol program within the 9.2 Vegetation Management Inspections Initiative in its 2026-2028 WMP. On February 2, 2026, Energy Safety approved SDG&E's 2026-2028 WMP, in which SDG&E makes this clarification.⁶⁹ As such, SDG&E has demonstrated recordkeeping improvements regarding its target species program within its Vegetation Management Inspections Initiative.

⁶⁸ Personal Communication. Meeting between Energy Safety and San Diego Gas & Electric Company, February 13, 2026.

⁶⁹ San Diego Gas & Electric Company, [2026-2028 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59448&shareable=true), Published September 30, 2025, URL:(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59448&shareable=true>).

Second, Energy Safety identified performance deficiencies regarding SDG&E's quality assurance and quality control program in 2023. SDG&E demonstrated that only 86% of Off-Cycle and "Memo" work orders were audited, missing its sample size target of 100% for Off-Cycle and "Memo" work orders in 2023. As such, in its 2023 CAP, SDG&E committed to establishing methods to track and validate the audit sample size and completion for its Off-Cycle and "Memo" work. Performance in 2024 demonstrated that SDG&E had made improvements toward achieving its sample size target for its Off-Cycle and "Memo" work, auditing 99% and 92% of all work orders, respectively, an improvement over its 2023 performance. Additionally, according to SDG&E's 2024 CAP, SDG&E has implemented a method to track its audit completion rates for all work associated with Off-Cycle HFTD work and "Memo" work in 2025. Energy Safety will continue to monitor progress SDG&E makes regarding its quality assurance and quality control program in future performance years.

While SDG&E has demonstrated program growth and improvements over previous audit cycles, the 2024 VMA also identified three new performance issues. First, SDG&E failed to meet its fuels management target in the Wood and Slash Management Initiative. SDG&E decreased fuels management work activities around poles before receiving approval from Energy Safety for a reduced program target amendment and was unable to achieve its target after receiving a rejection from Energy Safety on July 11, 2025. SDG&E incorporated plans to complete additional fuels management work around 500 poles in its 2025 workplan and stated it is on track to achieve this target in 2025.

Second, SDG&E did not provide sufficient documentation that it met its inspection target for Initiative 8.2.3.5 Substation Defensible Space. SDG&E did not submit corrective actions to address this performance deficiency in its substation defensible space program, stating that the deficiency was related to decommissioning two substations and that it considers work to be substantially complete and intended risk reduction achieved when performance is within 10% of the established target. Energy Safety determined that SDG&E did not complete inspection work during the last three months of the year and consequently missed the WMP commitment. Energy Safety expects SDG&E to implement the inspection program in accordance with the approved WMP to minimize risk of wildfire ignition risk.

Third, SDG&E documented constraints that impacted its ability to achieve the objective of its 8.2.3.4 Fall-In Mitigation Initiative. Energy Safety understands external factors can constrain work and cause delays which are outside SDG&E's control. However, unmitigated vegetation hazards can put undue ignition risk on SDG&E's system. In its fall-in mitigation program, SDG&E documented 181 prescribed mitigations from detailed inspections were constrained, 144 of which SDG&E documented constraint resolution and work completion for. Resolution of these 144 vegetation hazards took an average of 578 days. Further, as of January 30, 2026, 37 prescribed mitigations from detailed inspections remain constrained. Energy Safety determined that SDG&E met the objective of Initiative 8.2.3.4 Fall-In Mitigation Initiative and has provided a description of its constraint resolution protocols. However, Energy Safety expects SDG&E to resolve constraints and complete the prescribed mitigation work as soon as possible to minimize wildfire risk due to vegetation hazards.

Overall, SDG&E demonstrated continued improvements in its vegetation management programs and has completed the majority of the vegetation management work in its WMP in performance year 2024. Energy Safety has identified deficiencies in three areas within SDG&E's vegetation management program; however, SDG&E acknowledged the program shortfalls and has planned for or initiated implementation of corrective actions to address these deficiencies. In addition, SDG&E has continued to demonstrate year-over-year improvements to its vegetation management management programs and has also committed to submitting additional detail as part of the QDR submittals to assist Energy Safety with field inspections and future audits. Energy Safety will continue to monitor progress on programmatic performance in SDG&E's 2025 audit cycle.

4. CONCLUSION

Based upon the analysis discussed in Sections 2 and 3, Energy Safety concludes that SDG&E has made year-over-year improvements in its vegetation management programs and has successfully achieved the objectives of 10 initiatives within its 2024 vegetation management program. Energy Safety has identified outstanding deficiencies in three initiatives within SDG&E's vegetation management program: 8.2.3.2 Wood and Slash Management, 8.2.3.5 Substation Defensible Space, and 8.2.6 Open Work Orders. SDG&E has acknowledged these deficiencies and has planned for or initiated implementation of corrective actions to address them.

DATA DRIVEN
FORWARD-THINKING
INNOVATIVE
SAFETY FOCUSED





APPENDIX 1. San Diego Gas and Electric Company's 2024 Vegetation Management Audit



APPENDIX DESCRIPTION

Pursuant to Public Utilities Code section 8386.3(b)(5)(A), Energy Safety may annually audit the vegetation management work performed by, or on behalf of, an electrical corporation. The Vegetation Management Audit (VMA) identifies deficiencies in the electrical corporation's implementation of the vegetation management commitments in its WMP.

For each of the 13 initiatives in Section 8.2 (Vegetation Management and Inspections) of SDG&E's 2023-2025 Wildfire Mitigation Plan (WMP), Energy Safety identified the quantitative targets and commitments as well as verifiable, narrative statements relevant to each initiative and compared that to the work performed by SDG&E in 2024.

This appendix reproduces the VMA sent to SDG&E on October 2, 2025 which describes Energy Safety's analysis and determination of whether SDG&E completed all work for each VM initiative in performance year 2024.

Energy Safety's analysis included a summary of the information provided by SDG&E to substantiate completion of each target or statement, Energy Safety's analysis of that information, and a conclusion regarding completion. Based on the determination of completeness for all targets and statements, Energy Safety provides a finding for each initiative. Energy Safety gave a finding of "Complete" if SDG&E provided sufficient documentation or supporting information demonstrating completion of all targets and/or statements within that initiative. If any target or statement was incomplete or insufficiently documented, Energy Safety determined that the initiative was "deficient."

For any commitment or statement for which the SDG&E was not able to provide supporting documentation or information to support completion, SDG&E was asked to address those deficiencies as a part of a corrective action plan (CAP). SDG&E's CAP is included in Appendix 2.

San Diego Gas and Electric Company's
2024 WMP Vegetation Management Audit

Audit Date: October 2, 2025

Response Due: November 1, 2025

To: San Diego Gas & Electric
Lena McMillin
Wildfire Mitigation Program Manager
8326 Century Park Court, CP32
San Diego, CA 92123

From: Sheryl Bilbrey
Sheryl.Bilbrey@energysafety.ca.gov

CC: Karen McLaughlin, Energy Safety
Chelsea Contreras-Valecia, Energy Safety
Forest Kaser, CPUC
Leslie Palmer, CPUC
Juan Estrada, SDG&E
Crystal Bertolini, SDG&E
Kari Kloberdanz, SDG&E
Shewit Woldegiorgis, SDG&E
Laura Fulton, SDG&E

Subject: Office of Energy Infrastructure Safety's Audit of San Diego Gas and Electric Company's 2024 WMP Vegetation Management Commitments

Pursuant to Public Utilities Code section 8386.3(5)(A), the Office of Energy Infrastructure Safety (Energy Safety) has completed an audit of the WMP vegetation management initiative commitments in San Diego Gas and Electric Company's (SDG&E) 2023-2025 Wildfire Mitigation Plan (WMP) for the 2024 performance year.

The audit findings provided in this document are based on Energy Safety's analysis of all relevant data provided to Energy Safety by SDG&E to substantiate completion of all vegetation management work commitments in qualitative statements and quantitative targets in its WMP during performance year 2024. Instances where the data provided by

SDG&E did not substantiate completion of the work associated with the WMP vegetation management initiative commitments are documented as deficiencies in this audit.

Upon receipt of this audit document, SDG&E must provide additional data or clarifications to Energy Safety as part of a Corrective Action Plan (CAP), described below. Energy Safety is available to meet with SDG&E to discuss the audit findings and provide any clarification necessary for SDG&E to prepare the CAP. SDG&E must submit the CAP via email to Energy Safety within 30 days of receipt of this audit.

Energy Safety will consider all supplemental information and data included in the CAP as part of our analysis of SDG&E's performance relative to the 2024 WMP vegetation management initiative commitments. Upon completion of Energy Safety's analysis of the CAP, Energy Safety will publish an Audit Report identifying any outstanding deficiencies in SDG&E's implementation or planned corrective actions relative to its vegetation management commitments in the SDG&E 2023-2025 WMP.⁷⁰

⁷⁰ San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true), Published June 7, 2024, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true).

SDG&E Corrective Action Plan

The CAP is an opportunity for SDG&E to provide supplemental data, additional supporting documentation and/or clarifying statements for consideration by Energy Safety as part of our analysis of SDG&E's implementation or planned corrective actions relative to its vegetation management commitments in the 2023-2025 WMP. To support Energy Safety's performance assessment, the SDG&E CAP may include any of the following:

- Supplemental data and/or supporting documentation substantiating completion of all work on the vegetation management commitment identified as deficient or incomplete in this audit during the 2024 performance year;
- Detailed documentation of constraint(s) that prevented completion of the work commitment and actions SDG&E has taken to resolve those constraints; and/or
- Description of corrective actions SDG&E has implemented or plans to implement to address outstanding deficiencies identified in past or current vegetation management audits.

SDG&E must email a copy of its response report to Energy Safety within **30 days** of receipt of this document. The list of recipients should include:

- Karen McLaughlin, karen.mclaughlin@energysafety.ca.gov
- Chelsea Contreras-Valecia, Chelsea.Contreras-Valencia@energysafety.ca.gov
- Environmental Science Division, environmentalscience@energysafety.ca.gov

Audit Process Overview

Energy Safety analyzed each of the thirteen vegetation management initiatives listed in SDG&E's 2023-2025 WMP⁷¹ as part of this initial audit report. The WMP identifies the electrical corporation's objectives, preventative strategies, and programs that it has implemented to minimize the risk that its infrastructure will cause catastrophic wildfire. The vegetation management section of the WMP includes 13 initiatives, each of which includes one or more specific work commitments. These commitments include both quantitative targets (e.g., completion of a specified number of inspections) and narrative, but verifiable, statements (e.g., implementation of personnel training programs). Energy Safety identified the WMP quantitative commitments and narrative statements relevant to each initiative and compared that to the work performed by SDG&E in performance year 2024. Determination of whether all work was complete for each commitment was based on data and documentation submitted by SDG&E.

For each initiative in Section 8.2 (Vegetation Management and Inspections) of SDG&E's 2023-2025 WMP, quantitative targets and commitments as well as verifiable, narrative statements are assessed for completion. SDG&E provided data and documentation to support completion of work for eight of the 13 initiatives and did not provide information and documentation to support completion of work for five initiatives. A summary of Energy Safety's findings regarding the VM initiatives is presented in Table 1. A summary of all work commitments for each initiative and Energy Safety's determination on completeness is presented in Table 2.

For each WMP commitment, a summary of the supporting information provided by SDG&E, Energy Safety's analysis of that information, and a conclusion regarding completion are documented. Energy Safety then provides a finding for each initiative. A finding of "complete" was given only if SDG&E provided sufficient data or supporting information demonstrating completion of all commitments (targets and/or statements) within that initiative. If any commitment was incomplete or insufficiently documented, the overall finding for the initiative was "deficient."

⁷¹ San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true), Published June 7, 2024, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true).

Table 1. Summary of Energy Safety's findings regarding completion of SDG&E's VM Initiatives in its 2023-2025 WMP for performance year 2024. Deficient initiatives are bold.

Programmatic Area	Vegetation Management Initiative	Audit Finding
8.2.2. Vegetation Management Inspections	8.2.2. Vegetation Management Inspections	Complete
8.2.3. Vegetation and Fuels Management	8.2.3.1 Pole Clearing	Complete
8.2.3. Vegetation and Fuels Management	8.2.3.2 Wood and Slash Management	Deficient
8.2.3. Vegetation and Fuels Management	8.2.3.3 Clearance	Complete
8.2.3 Vegetation and Fuels Management	8.2.3.4 Fall-In Mitigation	Deficient
8.2.3. Vegetation and Fuels Management	8.2.3.5 Substation Defensible Space	Deficient
8.2.3 Vegetation and Fuels Management	8.2.3.6 High-Risk Species	Complete
8.2.3 Vegetation and Fuels Management	8.2.3.7 Fire Resilient Right-of-Ways	Complete
8.2.3 Vegetation and Fuels Management	8.2.3.8 Emergency Response of Vegetation Management	Complete
8.2.4 Vegetation Management Enterprise System	8.2.4 Vegetation Management Enterprise System	Complete
8.2.5 Quality Assurance and Quality Control	8.2.5. Quality Assurance and Quality Control	Deficient
8.2.6 Open Work Orders	8.2.6 Open Work Orders	Deficient
8.2.7 Workforce Planning	8.2.7 Workforce Planning	Complete

Table 2. Summary of Energy Safety's findings regarding completion of SDG&E's WMP commitments in performance year 2024. Incomplete commitments are bold.

WMP Commitment	2024 Target	2024 Actual	Audit Conclusion
8.2.2.1 Detailed Vegetation Inspections (WMP .494)	485,400 tree units inspected	524,988 tree units inspected	Completed all work
8.2.2.1 Detailed Vegetation Inspections (WMP .494)	133 VMAs	133 VMAs	Completed all work
8.2.2.1 Detailed Vegetation Inspections (WMP .494)	Detailed Level-2 inspection of HFTD trees	265,332 Level-2 inspection of HFTD trees	Completed all work
8.2.2.2 Off-Cycle HFTD Patrol Inspections (WMP .508)	106 VMAs	106 VMAs	Completed all work
8.2.2.2 Off-Cycle HFTD Patrol Inspections (WMP .508)	Twice-annual patrol of 240,000 trees	276,867 tree units	Completed all work
8.2.2.2 Off-Cycle HFTD Patrol Inspections (WMP .508)	Off-cycle Level-2 inspection of HFTD trees	276,867 Level-2 inspection of HFTD trees	Completed all work
8.2.2.2 Targeted Species Patrols	Patrols for Century Plant and Bamboo	Achieved	Completed all work
8.2.3.1 Pole Clearing (WMP .512)	33,010 poles	36,001 poles	Completed all work
8.2.3.1 Pole Clearing Environmental Review (WMP .512)	Performed in advance of newly required brushing	259 new pole environmental reviews	Completed all work
8.2.3.1 Pole Clearing in LRA (WMP .512)	Approximately 2,475 poles in LRA	3,021 poles cleared in LRA	Completed all work
8.2.3.2 Fuels Management (WMP .497)	500 poles	147 poles	Did not complete all work
8.2.3.2 Wood and Slash Debris Management (WMP .497)	Complete removal, cut and left, or left upon request	Could not verify completion	Did not complete all work
8.2.3.2 Debris Removed from Banks of Watercourses (WMP .497)	All debris associated with tree operations is removed	Removed debris generated from 3,346 trees in watercourses	Completed all work
8.2.3.3 Enhanced Clearance (WMP .501)	11,200 trees	11,781 trees units	Completed all work
8.2.3.3 Clearance of Inventory Trees Within HFTD	30% of trees in HFTD are cleared 5% receive enhanced clearance	33% of trees in HFTD cleared 4% received enhanced clearance	Completed all work

WMP Commitment	2024 Target	2024 Actual	Audit Conclusion
8.2.3.4 Complete prescribed mitigations (WMP .508 and WMP. 494)	80,852 mitigations prescribed during detailed and off-cycle inspections	74,606 mitigations completed	Did not complete all work
8.2.3.5 Substation Patrol Inspections (WMP.492)	384 inspections	379 inspections	Did not complete all work
8.2.3.6 "Right Tree, Right Place" initiative (WMP .1325)	Offer incentives to replace incompatible trees near power lines	613 replacement trees provided	Completed all work
8.2.3.6 Community Tree Rebate Program (WMP .1326)	Target underserved communities to promote the planting of trees	3,044 tree rebates	Completed all work
8.2.3.7 Vegetation Abatement (WMP .1327)	Maintain SDG&E-owned parcels in a fire-safe manner	Mechanical and goat grazing	Completed all work
8.2.3.8 Hazard Tree Assessment After Fires (WMP. 496)	Visual inspection and abatement activities of all trees within the strike zone in the fire perimeter	Conducted post-fire hazard tree inspections of 93 tree units, 0 resulting in tree work	Completed all work
8.2.3.8 Hazard Tree Assessment After Fires (WMP. 496)	In advance of a forecasted RFW or Santa Ana event. Participate in SDG&E Emergency Operations training	No additional inspections were needed. Vegetation Management trainings conducted	Completed all work
8.2.4 List of improvements made to its vegetation management enterprise system (WMP .511)	Six improvements proposed	Six improvements made	Completed all work
8.2.5 Pre-Inspection Audit Activities (WMP .505)	Audit 12-15% of pre-inspected tree units 95% pass rate	Audited 96% of pre-inspected tree units 94% pass rate	Did not complete all work
8.2.5 Tree Trimming Audit Activities (WMP .505)	Audit 12-15% of pre-inspected tree units 95% pass rate	Audited 23% of cleared tree units 94% pass rate	Did not complete all work
8.2.5 Pole Clearing Work Audit Activities (WMP .505)	Audit 12-15% of pre-inspected tree units 95% pass rate	Audited 23% of cleared poles 99% pass rate	Completed all work
8.2.5 Off-Cycle Trim Audit Activities (WMP .505)	100% of cleared trees from off-cycle patrol 95% pass rate	99% of cleared trees from off-cycle patrol 99% pass rate	Did not complete all work

WMP Commitment	2024 Target	2024 Actual	Audit Conclusion
8.2.5 Tree Trim “Memo” Work Audit Activities: (WMP .505)	Audit 100% of cleared “Memo” trees 95% pass rate	Audited 92% of cleared “Memo” trees 96% pass rate	Did not complete all work
8.2.5 Cursory (Level 1 “mid-cycle” patrol) Vegetation Inspections (WMP .505)	QA/QC audits occur 6-8 months following detailed inspection	79% of QA/QC audits occurred less than 6 months and 21% occurred 6-8 months following detailed inspection	Completed all work
8.2.6 Completion of Routine and Priority Work After Inspection	Routine Work: 120 days Priority Work: 30 days	83% of routine work in 120 days 61% of priority work in 30 days	Did not complete all work
8.2.7 Contractor Qualifications (WMP .506)	Auditors, Tree Trimmers, and Pre-Inspectors meet qualifications	Auditors, Tree Trimmers, and Pre-Inspectors meet qualifications	Completed all work
8.2.7 Contractor Wildfire Mitigation Plan training (WMP .506)	Fire preparedness, environmental protection, hazard tree assessment, and customer service	Fire preparedness, environmental protection, hazard tree assessment, and customer service	Completed all work

Analysis of Initiative Completion

8.2.2 Vegetation Management Inspections

The purpose of this initiative is to describe the “[i]nspections of vegetation around and adjacent to electrical facilities and equipment that may be hazardous by growing, blowing, or falling into electrical facilities or equipment.”⁷² Inspection activities along Distribution and Transmission lines included Detailed Vegetation Inspections and Off-Cycle Patrol Inspections, which are analyzed in the sub-sections below.

8.2.2.1 Detailed Vegetation Inspection

Quantitative Target or Commitment, Supporting Information, and Analysis

SDG&E included the following target in its 2023-2025 WMP.⁷³ For ease of comparison, the WMP target and work completed are summarized below:

Initiative Activity	SDG&Es 2024 Target	Actual Completed in 2024
Detailed Inspection- Tree Units	485,400 tree unit inspections	524,988 tree units inspected
Detailed Inspections- VMA	133 VMAs	133 VMAs

Supporting Information and Analysis: SDG&E provided two Excel files of the trees inspected under its Detailed Inspection program.⁷⁴ The files included the tree ID, number of units associated with that ID, location information (latitude, longitude, High Fire Threat District [HFTD] tier, vegetation management area [VMA]), inspection date, and whether the inspection was on its distribution or transmission system. Total inspections by fire risk and line type (percentages represent proportion relative to all inspections in SDG&E’s service territory) are summarized below:

⁷² Office of Energy Infrastructure Safety, [2023-2025 Base Wildfire Mitigation Plan Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true), Published December 6, 2022, p. A-24, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

⁷³ San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true), Published June 7, 2024, p. 258 URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true).

⁷⁴ Data Request OEIS-E-SVM_2025-SDG&E-001, Question 3; attachments: “SVM_2025-SDGE-001_HFTD_Q3.xlsx,” “SVM_2025-SDGE-001_nonHFTD_Q3.xlsx.”

Line Type	Non-HFTD		HFTD		Total Tree Units	
Distribution	245,489	(47%)	258,430	(49%)	503,919	(96%)
Transmission	14,167	(3%)	6,902	(1%)	21,069	(4%)
Total	259,656	(50%)	265,332	(50%)	524,988	

The files showed that SDG&E conducted detailed inspections on 524,988 tree units in 2024, 96% (503,919 out of 524,988) of which occurred on the distribution system. Detailed inspections were approximately evenly split across HFTD and non-HFTD (265,332 compared to 259,656, respectively). The Excel file also demonstrated that detailed inspections occurred across 133 unique VMAs.⁷⁵

In its 2023-2025 WMP, SDG&E stated, “Ten to twelve VMAs are pre-inspected each month within the Master Schedule such that all 133 VMAs are completed each year.”⁷⁶ In addition to the Excel file described above, SDG&E also provided an Excel file showing the start and end dates for all inspections in the VMAs in its service territory in performance year 2024⁷⁷ and a map of the locations of the VMAs.⁷⁸ The file showed that inspections of VMAs were distributed evenly throughout the year and all 133 VMAs were inspected in performance year 2024.

Conclusion: SDG&E provided information consistent with the completion of work identified in its target for Detailed Vegetation Inspections.

Narrative Statements, Supporting Information, and Analysis

Statement 1

Statement: “During the detailed inspection activity, all trees within and adjacent to the distribution and transmission right-of-way are assessed to determine whether tree trimming or removal is required for the annual cycle. Within the HFTD, all trees in the utility strike zone are assessed for tree growth and hazard potential, including a 360-degree, Level 2 inspection of the trees from the ground to the canopy. A Level-2 inspection includes an overall visual

⁷⁵ Data Request OEIS-E-SVM_2025-SDG&E-001, Question 3; attachments: “SVM_2025-SDGE-001_HFTD_Q3.xlsx,” “SVM_2025-SDGE-001_nonHFTD_Q3.xlsx.”

⁷⁶ San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 262 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true>).

⁷⁷ Data Request OEIS-E-SVM_2025-SDG&E-002, Question 3; attachment: “OEIS-E-SVM_SDG&E-002_Q3.xlsx.”

⁷⁸ Data Request OEIS-E-SVM_2025-SDG&E-002, Question 3; attachment: “OEIS-E-SVM_SDG&E-002_Q3_VMA_Map.pdf.”

inspection of the tree’s health including the root zone, trunk, and branches, and may entail sounding of the tree for structural integrity”⁷⁹

Supporting Information and Analysis: SDG&E provided an Excel file of the number of trees it inspected in HFTD in performance year 2024. The file included the tree ID, the number of tree units associated with that ID, location (latitude and longitude, HFTD tier, VMA), inspection date, the condition of each tree unit, the trim or removal date, line type (distribution or transmission), and information about the tree (height, diameter, species).⁸⁰ The inspection results for each tree unit referenced in this file are summarized in the table below for each line type (distribution or transmission) and for the entire electrical system (percentages represent the proportion of each line type).

Line Type	Prune Prescribed		Removal Prescribed		No work needed		Total Inspections
Distribution	77,109	(30%)	1,153	(<1%)	180,168	(70%)	258,430
Transmission	1,321	(19%)	23	(<1%)	5,558	(81%)	6,902
System total	78,430	(30%)	1,176	(<1%)	185,726	(70%)	265,332

The file indicates that SDG&E inspected a total of 265,332 tree units in 2024 that were within an HFTD across 106 VMAs and that mitigation (prune or removal) was prescribed for 79,606 tree units (78,430 prunes and 1,176 removals, 30% of all tree units).⁸¹ Of these tree units, 97% (258,430) were along distribution lines and 3% (6,902) were along transmission lines. For tree units along distribution lines, 30% (77,109 out of 258,430) were prescribed mitigation and 19% (1,321 of 6,902) along transmission lines.

SDG&E explained that the results of the level 2 inspection and risk evaluation of each tree can be derived from the pre-inspection code of each tree.⁸² As defined by SDG&E, these condition codes consider dead/ dying branches and overall tree defective conditions, both indicators of a level 2 inspection being conducted.

⁷⁹ San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 262 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true>).

⁸⁰ Data Request OEIS-E-SVM_2025-SDG&E-001, Question 4; attachment: “OEIS-E-SVM_SDG&E-002_Q4.xlsx.”

⁸¹ Data Request OEIS-E-SVM_2025-SDG&E-001, Question 4; attachment: “OEIS-E-SVM_SDG&E-002_Q4.xlsx.”

⁸² Data Request OEIS-E-SVM_2025-SDG&E-002, Question 4; Response 4.

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

8.2.2.2 Off-Cycle Patrol Inspections

Quantitative Target or Commitment, Supporting Information, and Analysis

SDG&E included the following target in its 2023-2025 WMP.⁸³ For ease of comparison, the WMP target and work completed are summarized below:

Initiative Activity	SDG&E's 2024 Target	Actual Completed in 2024
Off-Cycle HFTD Patrols	106 VMAs	106 VMAs
Off-Cycle HFTD Patrols	Approximately twice-annual patrol of 240,000 trees	276,867 tree units

Supporting Information & Analysis: SDG&E's WMP stated that of the 133 VMAs in its service territory, 106 are either partially or wholly within the HFTD, and approximately 240,000 of the 485,000 inventory trees are located within the HFTD.⁸⁴ SDG&E committed to inspecting all inventory trees in HFTD as a part of its Off-Cycle Patrol Inspections. SDG&E provided an Excel file listing the off-cycle patrol inspections conducted in 2024.⁸⁵ Based on this file, SDG&E completed off-cycle patrol inspections on 276,867 tree units in 106 different VMAs. Of these trees, 269,647 (97%) were on distribution lines and 7,220 (3%) were on transmission lines. Therefore, SDG&E exceeded their expected number of off-cycle patrol inspections.

Conclusion: SDG&E provided information consistent with the completion of work identified in its target for Off-Cycle Patrol Inspections.

Narrative Statements, Supporting Information, and Analysis

Statement 2

Statement: "During the off cycle HFTD patrol all trees within the strike zone of the secondary, distribution, and transmission lines receive a Level 2 hazard evaluation. Trees tall enough to strike overhead electric lines are assessed for trimming or removal and include identification

⁸³ San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, pp.145-146 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true>).

⁸⁴ San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 266 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true>).

This table was modified for Energy Safety's data request to include statements and targets relevant to 2024.

⁸⁵ Data Request OEIS-E-SVM_2025-SDG&E-002, Question 6; attachment: "OEIS-E-SVM_SDG&E-002_Q6.xlsx."

of dead, dying, and diseased trees, live trees with a structural defect, and conditions such as wind sway and line sag.”⁸⁶

Supporting Information & Analysis: SDG&E provided an Excel file documenting the trees inspected during its patrol inspections in performance year 2024. The file included the date of their first detailed inspection, the date of their second patrol inspection, location information (latitude, longitude, HFTD tier and VMA), any prescribed vegetation clearance work (e.g., trimming or removal) resulting from the off cycle HFTD patrol, the date any prescribed work was completed, and information about the tree (height, diameter, species), and if each inspection activity was associated with SDG&E’s distribution or transmission system.⁸⁷

For the 276,867 tree units that were inspected during an off-cycle patrol, SDG&E stated that the results of the level 2 inspection and risk evaluation of each tree can be derived from the condition code of each tree.⁸⁸ As defined by SDG&E, these condition codes signify the completion of having addressed dead/ dying branches and overall tree defective conditions, both indicators of level 2 inspections being conducted and addressed.⁸⁹

SDG&E also clarified that some tree IDs may not include an inspection date for the Detailed Inspection activity or the Off-Cycle Patrol because either the tree was removed in the field and, therefore, didn’t exist as an inventory record at the time of the second chronological inspection activity in 2024, or the tree did not exist as an inventory record prior to the first chronological inspection activity in 2024.⁹⁰

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

Statement 3

Statements: SDG&E provided two statements regarding additional patrols for targeted species:

- 1) **Century Plant:** “For targeted species patrols, a second, annual inspection is performed for every inventory Century plant within the service territory. An additional

⁸⁶ San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 266 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true>).

⁸⁷ Data Request OEIS-E-SVM_2025-SDG&E-002, Question 6; attachment: “OEIS-E-SVM_SDG&E-002_Q6.xlsx.”

⁸⁸ Data Request OEIS-E-SVM_2025-SDG&E-002, Question 6; Response 6.

⁸⁹ Data Request OEIS-E-SVM_2025-SDG&E-002, Question 4; Response 4.

⁹⁰ Data Request OEIS-E-SVM_2025-SDG&E-002, Question 6; Response 6.

annual inspection is performed for this species due to their fast and unpredictable growth.”⁹¹

- 2) **Bamboo:** “The targeted species patrols for Bamboo are scheduled in the summer and fall each year. During these activities, every Bamboo in the Vegetation Management tree inventory database is inspected for growth. These patrols are in addition to the routine detailed inspection that occurs within each VMA’s scheduled month.”⁹²

Supporting Information & Analysis:

Century Plant: SDG&E provided an Excel file of all Century Plants in its inventory. The file included the tree ID, species (Century Plant), number of tree units associated with the tree ID, the pre-inspection date and work order number, condition identified during the pre-inspection, patrol inspection date and work order number, trim or removal activities and dates, and location information (latitude, longitude, HFTD tier, VMA, and whether the inspection was along distribution or transmission lines).⁹³ The file showed pre-inspection and patrol inspection information for 10,828 unique Century Plant IDs. Of these Tree IDs, 7,960 (42%) Century Plants received two pre-inspections and a patrol inspection, 4,061 (22%) received one pre-inspection and a patrol inspection, 6,394 (34%) had a pre-inspection but no patrol inspection, and 373 (2%) were deleted from the inventory after pre-inspection because they were no longer in scope. Of the 6,394 Century Plants that did not receive a patrol inspection, 6,345 (99%) had a condition described as “clear” meaning no work was required, 52 (1%) required pruning and the pruning was listed as completed for 45 of these trees. All of the Century Plants that did not receive a second patrol inspection were in non-HFTD.

Bamboo: SDG&E provided an Excel file of all Bamboo Plants in its inventory. The file included the tree ID, species (Bamboo), number of tree units associated with the tree ID, the pre-inspection date and work order number, condition identified during the pre-inspection, patrol inspection date and work order number, trim or removal activities and dates, and location information (latitude, longitude, HFTD tier, VMA, and whether the inspection was along distribution or transmission lines).⁹⁴ The file showed pre-inspection and patrol inspection information for 2,701 unique Bamboo Tree IDs. Of these Tree IDs, 457 (17%) Bamboo Plants received three or more inspections (combination of pre-inspections and patrol), 1,294 (48%) received two inspections (combination of pre-inspections and a patrol),

⁹¹ San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 267 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true>).

⁹² San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 267 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true>).

⁹³ Data Request OEIS-E-SVM_2025-SDG&E-001, Question 8; attachment: “SVM_2025-SDGE-001_Q8.xlsx.”

⁹⁴ Data Request OEIS-E-SVM_2025-SDG&E-001, Question 10 attachment: “SVM_2025-SDGE-001_Q10.xlsx.”

796 (29%) had a pre-inspection but no patrol inspection, and 154 (5%) were deleted from the inventory after pre-inspection because they were no longer in scope. SDG&E stated that its experience and history with Bamboo growth rates has indicated that two inspections for Bamboo are all that is required and that fall/winter is the optimal timeframe for targeted species patrol; therefore, it did not perform the summer Bamboo patrol.⁹⁵ Assuming that only two inspections are necessary for Bamboo, 796 Bamboo Plants only received one inspection in 2024. SDG&E provided proposed corrective actions for its Bamboo Patrols and commitments to update the language describing these programs in its 2026-2028 WMP.⁹⁶ All of the Bamboo Plants that were only inspected once were in non-HFTD.

Targeted Species Patrols: The WMP is unclear as to whether Targeted Species Patrols should occur only in HFTD or throughout SDG&E's service territory. The WMP states: "Vegetation Management performs a second annual tree inspection activity within the HFTD referred to as the "off-cycle" patrol (8.2.2.2 Targeted Species Patrols)."⁹⁷ But regarding Century Plant and Bamboo patrols, HFTD Tier is not specified.⁹⁸ In response to data request OEIS-E-SVM-2025-SDG&E-002, SDG&E clarified that the targeted species patrols were specifically for plants in HFTD.⁹⁹ As a part of its corrective actions, SDG&E has stated that it will update the language in the 2026-2028 WMP to avoid confusion in future performance years. Because the Century and Bamboo Plants missing the final inspection were in non-HFTD, Energy Safety found that SDG&E completed all work associated with targeted species patrols in HFTD in performance year 2024.

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

Finding – 8.2.2 Vegetation Management Inspections

SDG&E provided information consistent with the completion of work identified in 8.2.2.1 Detailed Vegetation Inspection and 8.2.2.2 Off-Cycle Patrol Inspections. Therefore, Energy Safety concludes that Initiative 8.2.2 Vegetation Management Inspections is complete.

⁹⁵ Data Request OEIS-E-SVM_2025-SDG&E-001, Question 10 response.

⁹⁶ Data Request OEIS-E-SVM_2025-SDG&E-001, Question 10 response.

⁹⁷ San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true), Published June 7, 2024, p. 266 URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true).

⁹⁸ San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true), Published June 7, 2024, p. 267 URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true).

⁹⁹ Data Request OEIS-E-SVM_2025-SDG&E-002, Question 7 and Question 8 responses.

8.2.3.1 Vegetation and Fuels Management – Pole Clearing

The purpose of this initiative is to describe the “[p]lan and execution of vegetation removal around poles per Public Resources Code section 4292 and outside the requirements of Public Resources Code section 4292 (e.g., pole clearing performed outside of the State Responsibility Area).”¹⁰⁰

Quantitative Target or Commitment, Supporting Information, and Analysis

SDG&E included the following target in its 2023-2025 WMP.¹⁰¹ For ease of comparison, the WMP target and work completed are summarized below:

Initiative Activity	SDG&E’s 2024 Target	Actual Completed in 2024
Pole Clearing	33,010 poles	36,001 poles

Supporting Information and Analysis: SDG&E provided an Excel file of the poles brushed in 2024 as a part of its Pole Clearing initiative. The file included the pole ID, clearing activity (chemical, mechanical, or re-clearing), completion date, PRC 4292 exemption status, initial inspection date (between 2022 and 2024), location information (latitude, longitude, whether the poles were in the Local Responsibility Area [LRA] or State Responsibility Area [SRA], and HFTD tier.¹⁰² The number of PRC 4292 exempt and non-exempt poles cleared in HFTD, non-HFTD, and both HFTD and non-HFTD (total poles) are summarized in the table below. The percentages represent the proportion of that pole type of the total number of poles in the cleared (e.g. the percentage relative to a total of 36,001 total poles).

PRC 4292 Status	Poles in HFTD		Poles in Non-HFTD		Total Poles	
Exempt	1,280	(4%)	1,181	(3%)	2,461	(7%)
Non-Exempt	30,841	(86%)	2,699	(7%)	33,540	(93%)
Total poles	32,121	(89%)	3,880	(11%)	36,001	

¹⁰⁰ Office of Energy Infrastructure Safety, [2023-2025 Base Wildfire Mitigation Plan Technical Guidelines](#), Published December 6, 2022, p. A-24, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

¹⁰¹ San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 257 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true>).

¹⁰² Data Request OEIS-E-SVM_2025-SDG&E-001, Question 12; attachment: “SVM_2025-SDGE-001_Q12.xlsx.”

The file showed that SDG&E cleared 2,461 exempt poles (7% of 36,001 total poles) and 33,540 non-exempt poles (93%) throughout its service territory in 2024. Most of the pole brushing work was in HFTD (32,121 out of 36,001 poles or 89%) compared non-HFTD (3,880 poles or 11%).

SDG&E also provided the method of pole clearing, which are summarized in the table below by both HFTD tier, equipment exemption status, and for all poles. The percentages in the HFTD, Non-HFTD, Exempt, Non-Exempt columns represent the proportion of poles brushed using each method for each type of pole relative to the total number of all poles brushed of that pole type (last row). The percentage in the “All Poles” column represents the proportion of all poles brushed using each method relative to all poles brushed (36,001).

Pole Brushing Method	HFTD		Non HFTD		Exempt		Non-Exempt		All Poles	
Chemical Pole Brush	5,656	(18%)	1,576	(41%)	1,540	(63%)	5,692	(17%)	7,232	(20%)
Mechanical Pole Brush	24,003	(75%)	2,049	(53%)	491	(20%)	25,561	(76%)	26,052	(72%)
Reclear Pole Brush	765	(2%)	160	(4%)	430	(17%)	495	(1%)	925	(3%)
Chemical Pole Brush Warranty	1,697	(5%)	95	(2%)	0	(0%)	1,792	(5%)	1,792	(5%)
Totals	32,121		3,880		2,461		33,540		36,001	

SDG&E stated it would apply chemical methods for pole brushing whenever practical. Specifically, “[o]n poles where environmentally safe and with customer consent, contractors will apply an Environmental Protection Agency (EPA)-approved herbicide to suppress seed generation, limit vegetation re-growth, and reduce overall maintenance costs.”¹⁰³ While SDG&E did not commit to a specific number of chemical controls, the documentation indicates that mechanical control was the most common method. In HFTD, mechanical brushing was the most common method of pole brushing (applied in 75% of all poles, or 24,003 poles out of 32,121 poles in HFTD); whereas, in non-HFTD, chemical and mechanical brushing were both commonly applied (41% and 53% respectively). Chemical controls were more commonly applied to exempt poles (63%, 1,540 out of 2,461 exempt poles) and

¹⁰³ San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true), Published June 7, 2024, p. 273 URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true).

mechanical controls were more common in non-exempt poles (76%, 25,561 out of 33,540 non-exempt poles).

While this documentation supports that SDG&E exceeded its target for pole brush work in 2024, SDG&E also provided a second file reporting 36,457 total number of poles cleared in support of its quality assurance and quality control WMP commitments.¹⁰⁴ While the reported number of poles in this second file also exceeds the target number of completed pole brush work in 2024, the values are inconsistent with those in the first file and SDG&E did not supply documentation explaining the discrepancy. Energy Safety expects SDG&E to ensure accuracy and consistency among data files submitted to support the completion of work. However, because both files demonstrate that the target was met, Energy Safety concluded that SDG&E's pole brushing work was completed for performance year 2024.

Conclusion: SDG&E provided information consistent with the completion of work identified its target for Pole Clearing.

Narrative Statements, Supporting Information, and Analysis

Statement 4

Statement: “An environmental review is performed in advance of any new subject pole requiring brushing to assess impacts to protected species and habitat.”¹⁰⁵

Supporting Information & Analysis: SDG&E has stated that planning and execution of pole brushing activities requires an environmental review for each newly identified pole. SDG&E provided an Excel file listing total of 259 poles that underwent environmental review.¹⁰⁶ Of these poles, approximately 97% (252) were released for clearance work, nine poles were required additional environmental monitoring, nine poles were mechanically cleared and received herbicide application, 115 poles were mechanically cleared and did not receive herbicide application, and 17 poles were mechanically cleared and received a second mechanical clearing activity. Of the remaining 102 poles without an activity date, the file included explanations including exclusion from requiring brushing because they only had exempt hardware attached, were pending further environmental monitoring, were located in the LRA, or were scheduled to be brushed in 2025.¹⁰⁷

¹⁰⁴ Data Request OEIS-E-SVM_2025-SDG&E-001, Question 32; attachment: “SVM_2025-SDGE-001_Q32.xlsx.”

¹⁰⁵ San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 273 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true>).

¹⁰⁶ Data Request OEIS-E-SVM_2025-SDG&E-001, Question 14; attachment: “SVM_2025-SDGE-001_Q14 & Q15.xlsx.”

¹⁰⁷ Data Request OEIS-E-SVM_2025-SDG&E-002, Question 10; Response 10.

Energy Safety has only verified that this work was completed for purposes of the audit and did not assess the effectiveness of the environmental review process.

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

Statement 5

Statement: “In addition to the approximately 34,000 poles SDG&E clears every year for compliance and fire prevention, approximately 2,475 poles are cleared in the Local Responsibility Area (LRA). This includes poles located in areas of dense and/or highly flammable vegetation and/or located near steep topography. This work exceeds the regulatory requirement of PRC § 4292.”¹⁰⁸

Supporting Information & Analysis: SDG&E provided an Excel file indicating brushing work was completed for 3,021 poles in LRAs in 2024.¹⁰⁹ The file included the unique ID and location of each pole brushed, notation that the pole was in an LRA, and the date and type of pole clearing work completed. This file indicates that SDG&E exceeded the number of poles it had estimated it would clear in LRA in performance year 2024.

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

Finding – 8.2.3.1 Pole Clearing

SDG&E provided information consistent with the completion of work identified in this initiative. Therefore, Energy Safety concludes that initiative 8.2.3.1 Pole Clearing is complete.

¹⁰⁸ San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 274 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true>).

¹⁰⁹ Data Request OEIS-E-SVM_2025-SDG&E-001, Question 16; attachment: “SVM_2025-SDGE-001_Q16.xlsx.”

8.2.3.2 Vegetation and Fuels Management – Wood and Slash Management

The purpose of this initiative is to take actions “to manage all downed wood and “slash” generated from vegetation management activities.”¹¹⁰

Quantitative Target or Commitment, Supporting Information, and Analysis

SDG&E included the following target in its 2023-2025 WMP.¹¹¹ For ease of comparison, the WMP target and work completed are summarized below:

Initiative Activity	SDG&E’s 2024 Target	Actual Completed in 2024
Fuels Management	500 poles	147 poles

Supporting Information and Analysis: SDG&E provided an Excel file for its fuels management program which included the structure ID, fuel maintenance activity, completion date, PRC 4292 status, responsibility area, HFTD tier, and a short description of the fuel management work performed at each pole. The file demonstrated that SDG&E did not meet its Fuels Management target for performance year 2024 because it only completed vegetation management around 147 poles.¹¹²

Conclusion: SDG&E did not provide information consistent with the completion of work identified in this target.

Narrative Statements, Supporting Information, and Analysis

Statement 6

Statement: “Most of the wood and slash debris resulting from routine trimming and removal activities are chipped on site and removed from the property the same day the work is performed. Large wood debris (generally greater than 6 inches diameter) is cut into manageable lengths and left on site. Where requested, all wood debris and wood chips may be left on a landowner’s property for customer utilization.”¹¹³

¹¹⁰ Office of Energy Infrastructure Safety, [2023-2025 Base Wildfire Mitigation Plan Technical Guidelines](#), Published December 6, 2022, p. A-24, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

¹¹¹ San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 258 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true>).

¹¹² Data Request OEIS-E-SVM_2025-SDG&E-001, Question 11; attachment: “SVM_2025-SDGE-001_Q11.xlsx.”

¹¹³ San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 274 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true>).

Supporting Information and Analysis: SDG&E provided an Excel file of work orders for all tree trimming and removals activities completed in 2024.¹¹⁴ The file included the unique tree ID number, number of tree units associated with the ID, species, location information (latitude and longitude), trim or removal activity date, and audit date. The file showed that SDG&E trimmed 168,995 tree units and removed 4,862 tree units. However, this file did not include any information on wood and slash removal at the trim and removal sites. SDG&E also provided an Excel file which included locations where wood and slash were removed from specific properties. The file included the date, address, VMA, number of truckloads and weight in tons of debris removed. The file demonstrated that 136 truckloads of debris, totaling 299 tons removed from work sites in 2024.¹¹⁵

SDG&E also provided a screenshot image of its Sustainability Dashboard showing statistics on SDG&E's green waste. SDG&E's WMP stated that "[a]s part of its larger sustainability initiative, SDG&E continues to increase the amount of its wood and slash material that is diverted to a recycling facility. Currently, approximately 55 percent of total wood debris is diverted to a recycling facility to be rendered into composting or other environmentally sustainable materials."¹¹⁶ The Sustainability Dashboard screenshot demonstrated that 5,484 tons of green waste was removed to a recycling facility, 3,607 tons to a landfill facility, 299 tons were left on customer property, and that 60% of its total debris was diverted to a recycling facility.^{117,118} SDG&E also included a signed amendment to their Master Agreement for Vegetation Management Services, confirming that it directed its contractors to remove all biomass from the work site and appropriately dispose of it in an approved green waste facility.¹¹⁹

The documentation provided by SDG&E supported that it had protocols in place to manage wood and slash and that those protocols were completed in many instances; however, SDG&E could not verify that wood and slash were removed in all instances or that the removal was tied to its documented vegetation management activities. To correct this recordkeeping deficiency, SDG&E stated that it is currently in the process of developing additional capabilities within its work management system, *Epoch*, to document and track whether wood debris was left on site.¹²⁰ This new capability is expected to be implemented by the end of 2025. Energy Safety will audit those protocols when they are implemented. For

¹¹⁴ Data Request OEIS-E-SVM_2025-SDG&E-001, Question 17; attachment: "SVM_2025-SDGE-001_Q17a_b_f.xlsx."

¹¹⁵ Data Request OEIS-E-SVM_2025-SDG&E-001, Question 17; attachment: "SVM_2025-SDGE-001_Q17c_CONFIDENTIAL.xlsx."

¹¹⁶ San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 274 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true>).

¹¹⁷ Data Request OEIS-E-SVM_2025-SDG&E-001, Question 17; attachment: "SVM_2025-SDGE-001_Q17a_b_f.xlsx."

¹¹⁸ Data Request OEIS-E-SVM_2025-SDG&E-001, Question 19; attachment: "SVM_2025-SDGE-001_Q19.pdf."

¹¹⁹ Data Request OEIS-E-SVM_2025-SDG&E-001, Question 17; attachment: "SVM_2025-SDGE-001_Q17.zip."

¹²⁰ Data Request OEIS-E-SVM_2025-SDG&E-001, Question 17; Response 17.

performance year 2024, SDG&E did not provide sufficient documentation to support that wood and slash were removed for all trim and removal activities.

Conclusion: SDG&E did not provide information consistent with the completion of work identified in this statement.

Statement 7

Statement: “All debris associated with tree operations is removed from the channel and banks of watercourses (rivers, streams, lakes, wetlands, etc.) in accordance with environmental regulations such as California Department of Fish and Wildlife section 1600 (Fish and Game Code); California Department of Fish and Wildlife Lake and Streambed Alteration Program; and California Forest Best Practice Rules.”¹²¹

Supporting Information & Analysis: SDG&E provided an Excel file of removal activities for distribution and transmission lines near watercourses in 2024. The file included trim and removal activity dates, date debris was removed from watercourses, post-activity inspection dates, HFTD classifications, VMAs, and voltage class (Distribution and Transmission) designations. The file demonstrates that a total of 3,346 tree units were either trimmed or removed, and the debris generated from that work was removed from the adjacent watercourses in 2024.¹²² Energy Safety’s analysis only included an assessment of completion of the work described in the WMP, not compliance with the Fish and Game Code, Lake and Streambed Alteration Program, or California Forest Best Practice Rules.

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

Finding – 8.2.3.2 Wood and Slash Management

SDG&E did not provide information consistent with the completion of work identified in this initiative. Therefore, Energy Safety concludes that initiative 8.2.3.2 Wood and Slash Management is deficient.

In its CAP, SDG&E must provide justification for why its fuel management target was missed and a corrective action response addressing the deficiencies identified in its wood and slash removal programs. SDG&E may also expand upon if and how *Epoch* will alleviate the deficiency described.

¹²¹ San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 274 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true>).

¹²² Data Request OEIS-E-SVM_2025-SDG&E-001, Question 18; attachment: “SVM_2025-SDGE-001_Q18.xlsx.”

8.2.3.3 Vegetation and Fuels Management –Clearance

The purpose of this initiative is to take actions “after inspection to ensure that vegetation does not encroach upon electrical equipment and facilities, such as tree trimming.”¹²³

Quantitative Target or Commitment, Supporting Information, and Analysis

SDG&E included the following target in its 2023-2025 WMP.¹²⁴ For ease of comparison, the WMP target and work completed are summarized below:

Initiative Activity	SDG&E’s 2024 Target	Actual Completed in 2024
Enhanced Clearance	11,200 trees	11,781 tree units

Supporting Information and Analysis: SDG&E provided an Excel file of its Clearance work which included the Tree ID, number of Tree units associated with each ID, location information (latitude, longitude, HFTD tier), trim activity date, condition code, and line clearance achieved. The file demonstrated that 83% (9,753 out of 11,781) of tree units were trimmed and 17% (2,028 out of 11,781) of tree units were removed, for a total of 11,781 tree units which received enhanced clearance work in 2024 as a part of SDG&E’s Enhanced Vegetation Management Program.¹²⁵ SDG&E stated that this program focuses on applying expanded post-trim clearances on targeted species identified as higher risk.

Conclusion: SDG&E provided information consistent with the completion of work identified for its Clearance target.

¹²³ Office of Energy Infrastructure Safety, [2023-2025 Base Wildfire Mitigation Plan Technical Guidelines](#), Published December 6, 2022, p. A-24, URL:

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

¹²⁴ San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, pp. 257-258 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true>).

¹²⁵ Data Request OEIS-E-SVM_2025-SDG&E-001, Question 20; attachment: “VM_2025-SDGE-001_Q20.xlsx.”

Narrative Statements, Supporting Information, and Analysis

Statement 8

Statement: “Each year, an average of 30 percent of inventory trees within the HFTD are trimmed or removed and approximately 5 percent receive enhanced trimming or removal beyond the minimum 12-foot clearance.”¹²⁶

Supporting Information and Analysis:

SDG&E provided an Excel file documenting its inventory trees within the HFTD and the total number of regular and enhanced tree unit trims and removals within the HFTD.¹²⁷ This file contained the tree ID, number of tree units per tree ID, HFTD designation and location. The number of tree units trimmed (regular or enhanced) and the relative percentage of each mitigation type relative to the total number of trees (282,328) are summarized below:

Mitigation Type	Clearance	Percentage of total
Regular Trim	81,354	(29%)
Regular Removal	0	(0%)
Enhanced Trim	9,639	(3%)
Enhanced Removal	2,028	(1%)
Total Enhanced Clearances	11,667	(4%)
Total Clearances	93,021	(33%)
Total Inventory	282,328	

Based on this information, approximately 33% of inventory trees (93,021 out of 282,328) within the HFTD were trimmed or removed, and approximately 4% of inventory trees (11,667 out of 282,328) received enhanced trimming or removal beyond the minimum 12-foot clearance, consistent with the commitments in this statement.

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

Finding – 8.2.3.3 Clearance

SDG&E provided documentation to support that it completed all work for tree clearances. Therefore, Energy Safety concludes that initiative 8.2.3.3 Clearance is complete.

¹²⁶ San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 259 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true>).

¹²⁷ Data Request OEIS-E-SVM_2025-SDG&E-001, Question 1; attachments: “SVM_2025-SDGE-001_Q1.xlsx.

8.2.3.4 Vegetation and Fuels Management – Fall-In Mitigation

The purpose of this initiative is to take actions “to identify and remove or otherwise remediate trees that pose a high risk of failure or fracture that could potentially strike electrical equipment.”¹²⁸

Narrative Statements, Supporting Information, and Analysis

Statement 9

Statement: “The Fall-in Mitigation initiative (WMP.494) is integrated within the detailed vegetation and off-cycle patrol inspection (WMP.508) initiatives that target problematic species such as Eucalyptus, Palms, Century plant, Bamboo, certain species of Pine, Oak, and Sycamore, before they become a danger.”¹²⁹

Supporting Information and Analysis: To assess completion of the work for Fall-in mitigation, Energy Safety assessed whether work prescribed during detailed inspections was completed. SDG&E provided an Excel file of all detailed inspections and subsequent mitigation activities for performance year 2024.¹³⁰ The file included the tree ID, the number of tree units associated with that ID, location (latitude and longitude, HFTD tier, VMA), inspection date, the condition of each tree unit, the trim or removal date, line type (distribution or transmission), and information about the tree (height, diameter, species). Percent completion ($[\text{mitigations completed}]/[\text{total mitigations prescribed}] * 100\%$) is based on the Tree IDs, rather than tree units because work prescribed was for all tree units associated with the Tree ID (some Tree IDs had multiple units). SDG&E’s completion of its prescribed work is summarized in the table below. The analysis is also broken down by whether the mitigation was for memo trees (high priority) or assigned during routine pre-inspection (PI).

¹²⁸ Office of Energy Infrastructure Safety, [2023-2025 Base Wildfire Mitigation Plan Technical Guidelines](#), Published December 6, 2022, p. A-24, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

¹²⁹ San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 277 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true>).

¹³⁰ Data Request OEIS-E-SVM_2025-SDG&E-002, Question 4; attachment: “OEIS-E-SVM_SDG&E-002_Q4.xlsx.”

Mitigation Type (Detailed Inspections)	Mitigations Prescribed	Mitigations Completed		Incomplete Mitigations	
Memo- Prune	1,022	971	95.0%	51	5.0%
Memo-Removal	27	27	100.0%	0	0.0%
PI-Prune	66,040	60,021	90.9%	6,019	9.1%
PI-Removal	750	686	91.5%	64	8.5%
Total Prunes (Memo + PI)	67,062	60,992	90.9%	6,070	9.1%
Total Removals (Memo + PI)	777	713	91.8%	64	8.2%
Total Mitigations	67,839	61,705	91.0%	6,134	9.0%

**Energy Safety amended the findings in this table upon further analysis of the data SDG&E provided in "OEIS-E-SVM_SDG&E-002_Q4.xlsx" to ensure it accurately reflects the completion based upon Tree IDs, not Tree Units.*

For detailed inspections, SDG&E prescribed 79,604 mitigations and completed 73,358 of these mitigations along its distribution and transmission lines in performance year 2024 for a completion rate of 92%. SDG&E removed 100% of the memo trees prescribed and completed 94% of the prunes associated with these high priority vegetation hazards. Completion rates were similar for those trees assigned pruning and removals during pre-inspections (92% and 94% respectively). However, 8% of all mitigations were incomplete as of the end of performance year 2024.

SDG&E provided an Excel file listing its Off-Cycle Patrol Inspections for performance year 2024. The file included the tree ID, tree units, location information, inspection date, patrol work order number, tree information, line type, work activity, work activity date, and work status.¹³¹ As with detailed inspections, Energy Safety assessed whether work prescribed during off-cycle patrol inspections was completed on a Tree ID basis (as percent complete). SDG&E's completion of work orders associated with off-cycle patrols is summarized in the table below:

Mitigation Type (Off-Cycle Patrol Inspections)	Mitigations Prescribed	Mitigations Completed		Incomplete Mitigations	
Tree Trim	1,140	1,140	(100%)	0	(0%)
Tree Removal	108	108	(100%)	0	(0%)
Total Mitigations	1,248	1,248	(100%)	0	(0%)

The file demonstrated that SDG&E completed all mitigation work associated with its off-cycle patrol inspections in 2024.

¹³¹ Data Request OEIS-E-SVM_2025-SDG&E-001, Question 7; attachment: "OEIS-E-SVM_SDG&E-001_Q7.xlsx."

Overall, there was a total of 80,852 mitigations prescribed during detailed and off-cycle inspections of which 74,606 mitigations were completed.

Conclusion: SDG&E did not provide information consistent with the completion of work identified for this statement.

Finding – 8.2.3.4 Fall-In Mitigation

SDG&E did not provide information consistent with the completion of work to mitigate vegetation hazards identified during its detailed inspections. Therefore, Energy Safety concludes that initiative 8.2.3.4 Fall-In Mitigation is deficient.

In its CAP, SDG&E must provide updated records demonstrating completion of all mitigations to address vegetation hazards identified during its detailed inspections program and corrective actions to ensure that such hazards are mitigated in a timely manner in future performance years.

8.2.3.5 Vegetation and Fuels Management –Substation Defensible Space

The purpose of this initiative is to take actions “to reduce ignition probability and wildfire consequence due to contact with substation equipment.”¹³²

Quantitative Target or Commitment, Supporting Information, and Analysis

SDG&E included the following target in its 2023-2025 WMP.¹³³ For ease of comparison, the WMP target and work completed are summarized below:

Initiative Activity	SDG&E’s 2024 Target	Actual Completed in 2024
Substation Patrol Inspections	384 inspections	379 inspections

Supporting Information and Analysis: SDG&E’s WMP stated that: “Inspection activities are performed conjointly for distribution and transmission facilities. Vegetation Management does not perform vegetation inspection or maintenance activities within substation facilities. Vegetation Management responsibilities for maintenance begin in the portion of the first span located outside the fenced perimeter of substation facilities. Vegetation inspection and

¹³² Office of Energy Infrastructure Safety, [2023-2025 Base Wildfire Mitigation Plan Technical Guidelines](#), Published December 6, 2022, p. A-24, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

¹³³ San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 146 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true>).

maintenance within the perimeter of a substation must be performed by [qualified electrical workers] QEWs.”¹³⁴ Therefore, the work for this initiative is described in WMP Section 8.1.3.11.

SDG&E provided an Excel file of its substation patrol inspections which included the substation name, location, date of inspection and HFTD tier for each substation. The file demonstrated that SDG&E performed a total of 379 substation inspections, across 47 out of 162 substations in its service territory.¹³⁵ The file also indicated that SDG&E assigned 11 instances of weed control based on these inspections, which were all completed. Thus SDG&E did not meet its target for substation inspections and mitigations in performance year 2024.

SDG&E also clarified that Substation inspections are performed by internal SDG&E Qualified Electrical Workers (QEW), not contractors.¹³⁶ SDG&E stated that its QEWs complete and successfully pass the apprenticeship which consists of multiple weeks of Safety and Electrician Assistance training courses, and must successfully pass the Journeyman’s test conducted by the local union IBEW 465 in collaboration with SDG&E.

Conclusion: SDG&E did not provide information consistent with the completion of work identified for its Substation Patrol Inspections target.

Finding – 8.2.3.5 Substation Defensible Space

SDG&E did not provide information consistent with the completion of work identified in this initiative. Therefore, Energy Safety concludes that initiative 8.2.3.5 Substation Defensible Space is deficient.

In its CAP, SDG&E must either provide documentation demonstrating that met its substation patrol inspections target or provide documentation to justify why the inspections were not required and corrective actions it will implement to ensure the target is met in future performance years.

¹³⁴ San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 262 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true>).

¹³⁵ Data Request OEIS-E-SVM_2025-SDG&E-001, Question 22; attachment: “SVM_2025-SDGE-001_Q2_Q22.xlsx.”

¹³⁶ Data Request OEIS-E-SVM_2025-SDG&E-002, Question 1; Response 1.

8.2.3.6 Vegetation and Fuels Management – High-Risk Species

The purpose of this initiative is to take actions “to reduce the ignition probability and wildfire consequence attributable to high-risk species of vegetation.”¹³⁷

Narrative Statements, Supporting Information, and Analysis

Statement 10

Statement: “As part of its tree removal program and its “Right Tree, Right Place” initiative, and for safety and reliability, SDG&E continues to offer customers the incentive to remove incompatible trees growing near power lines and continues to provide replacement trees compatible to plant near power lines.”¹³⁸

Supporting Information and Analysis: SDG&E provided an Excel file documenting the trees removed in the Right Tree, Right Place program as well as the replacement trees. The file included the location information (latitude, longitude, address), number of trees removed, the species removed, whether the tree was considered high risk or not, the removal date, the replacement tree species, the number of replacement trees and the delivery date. The file demonstrated that SDG&E removed 265 tree units and provided 613 replacement trees during performance year 2024.¹³⁹

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

Statement 11

Statement: “The Community Tree Rebate Program will target underserved communities to promote the planting of trees where climate equity is compromised. The program will offer each applicant a rebate on the purchase of up to 5 trees, ranging from 1 to 15 gallons.”¹⁴⁰

Supporting Information & Analysis: SDG&E provided an Excel file of work completed for its Community Tree Rebate Program which included the tree type, community, zip code, rebate, date the rebate was provided, size of the tree, rebate amount (\$), tree equity score,

¹³⁷ Office of Energy Infrastructure Safety, [2023-2025 Base Wildfire Mitigation Plan Technical Guidelines](#), Published December 6, 2022, p. A-24, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

¹³⁸ San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 277 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true>).

¹³⁹ Data Request OEIS-E-SVM_2025-SDG&E-002, Question 13; attachment: “OEIS-E-SVM_SDG&E-002_Q13.xlsx.”

¹⁴⁰ San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 278 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true>).

community equity information, and HFTD. The file documenting 3,044 tree rebates provided for 1-, 5-, and 15-gallon trees throughout San Diego and surrounding communities. The total dollar amount of the rebates was \$125,990 for performance year 2024.¹⁴¹

SDG&E also provided information about its promotional materials, general awareness emails, and social media posts throughout 2024.¹⁴² SDG&E explained that the “Make San Diego Greener” campaigns helped the program exceed their 3,000 enrollments and 3,000 trees planted goals.

SDG&E also outlined the criteria used in 2024 to determine customers’ eligibility for participation in the Community Tree Rebate Program.¹⁴³ SDG&E identified eligible customers based on their zip codes (including those living in the HFTD Tiers 2 and 3) and equity scores. SDG&E measured customers’ equity scores based on various data sets, including but not limited to, the Tree Equity Score, CalEnviroScreen 4.0., Healthy Places Index, Climate Equity for the City of Chula Vista, and Climate Equity for the city of San Diego. SDG&E provided evidence of these scores being collected.¹⁴⁴

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

Finding – 8.2.3.6 High-Risk Species

SDG&E provided information consistent with the completion of work identified in this initiative. Therefore, Energy Safety concludes that initiative 8.2.3.6 High-Risk Species is complete.

8.2.3.7 Vegetation and Fuels Management – Fire Resilient Right-of-Ways

The purpose of this initiative is to take actions “to promote vegetation communications that are sustainable, fire-resilient, and compatible with the use of the land as an electrical corporation right-of-way.”¹⁴⁵

¹⁴¹ Data Request OEIS-E-SVM_2025-SDG&E-002, Question 14; attachment: “OEIS-E-SVM_SDG&E-002_Q14_Q15.xlsx.”

¹⁴² Data Request OEIS-E-SVM_2025-SDG&E-001, Question 23; attachment: “SVM_2025-SDGE-001_Q23.pdf.”

¹⁴³ Data Request OEIS-E-SVM_2025-SDG&E-001, Question 24; Response 24.

¹⁴⁴ Data Request OEIS-E-SVM_2025-SDG&E-002, Question 14; “OEIS-E-SVM_SDG&E-002_Q14_Q15.xlsx.”

¹⁴⁵ Office of Energy Infrastructure Safety, [2023-2025 Base Wildfire Mitigation Plan Technical Guidelines](#), Published December 6, 2022, p. A-24, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

Narrative Statements, Supporting Information, and Analysis

Statement 12

Statement: “Vegetation Abatement activity was implemented to maintain SDG&E-owned parcels in a fire-safe manner as required by various municipal compliance ordinances, Fire Marshal directives, and community safety expectations. Typically, the same properties are abated annually or on a frequency based on vegetation growth. Depending on conditions such as plant species and rainfall frequency, inspection activities may occur monthly or weekly and may change depending on the season.”¹⁴⁶

Supporting Information and Analysis: SDG&E provided an Excel file documenting transmission and substation corridor abatement activities performed in its owned parcels in 2024.¹⁴⁷ The file included worksheets for cities in its service territory, and each worksheet included parcel number, property description, address, land use, acres, property rights, latitude and longitude. The file indicated which parcels were abated using goat grazing and which were mechanically abated. Based on this information, SDG&E’s third-party vendor conducted mechanical abatement 25 times in transmission corridors and seven times in substations. In contrast, goat grazing was used 40 times in transmission corridors and 3 times in substations. SDG&E explained that it does not currently track acres completed because it would require survey marking as parcels to be strung together to form a transmission corridor.

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

Finding – 8.2.3.7 Fire Resilient Right-of-Ways

SDG&E provided information consistent with the completion of work identified in this initiative. Therefore, Energy Safety concludes that initiative 8.2.3.7 Fire Resilient Right-of-Ways is complete.

¹⁴⁶ San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 278 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true>).

¹⁴⁷ Data Request OEIS-E-SVM_2025-SDG&E-001, Question 25; attachment: “SVM_2025-SDGE-001_Q25.”

8.2.3.8 Vegetation and Fuels Management –Emergency Response of Vegetation Management

The purpose of this initiative is the “planning and execution of vegetation activities in response to emergency situations including weather conditions that indicate an elevated fire threat and post-wildfire service restoration.”¹⁴⁸

Narrative Statements, Supporting Information, and Analysis

Statement 13

Statement: “After any fire event of significant size Vegetation Management conducts a hazard tree assessment within the fire perimeter to identify dead, burned, and structurally defective trees that may pose a future threat to the overhead conductors or that may be required to facilitate restoration activities. The scope of such patrols includes a visual inspection of all trees within the strike zone in the fire perimeter. Abatement activities include topping dead/defective trees that could strike the lines or felling a tree if deemed required for worker safety, facility, or environmental protection.”¹⁴⁹

Supporting Information and Analysis: SDG&E explained that there were four wildfires of relatively small size in 2024 (Anita, Garden, Posta, and Resort) that triggered a post-fire hazard tree inspection completed under its Emergency Response Vegetation Management initiative.¹⁵⁰ SDG&E provided an Excel file of its post-fire inspections which included the tree ID, number of tree units, the fire associated with the inspection, location information, start and end of the assessment dates, and the assessment outcome.¹⁵¹ The file demonstrated that SDG&E conducted post-fire hazard tree inspections of 93 tree units. None of the fires resulted in the need for follow-on tree work.

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

¹⁴⁸ Office of Energy Infrastructure Safety, [2023-2025 Base Wildfire Mitigation Plan Technical Guidelines](#), Published December 6, 2022, p. A-24, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

¹⁴⁹ San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 279 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true>).

¹⁵⁰ Data Request OEIS-E-SVM_2025-SDG&E-001, Question 26; Response 26.

¹⁵¹ Data Request OEIS-E-SVM_2025-SDG&E-001, Question 26; attachment: “VM_2025-SDGE-001_Q26.xlsx.”

Statement 14

Statement: “In advance of a forecasted RFW or Santa Ana event, SDG&E will determine if additional vegetation management patrols are needed to assess tree conditions and/or where known imminent issues may exist. Vegetation Management also participated in SDG&E Emergency Operations training for improved situational awareness and resource coordination.”¹⁵²

Supporting Information & Analysis: SDG&E provided a detailed explanation of its protocols related to high wind events. SDG&E explained that it issues its seven-day Fire Potential Index (FPI) forecast which indicates whether fire and weather conditions are normal, elevated or extreme.¹⁵³ Based on the forecasted severity of the event, the timing and duration of the event, the relationship between the expected affected area and the schedule of the routine tree trimming operations, and the detailed weather forecast provided by SDG&E Meteorology, Vegetation Management can determine whether a patrol may be warranted. Criteria for determining where known imminent issues may exist can include outstanding customer refusals and priority memos. SDG&E explained that in 2024, SDG&E Vegetation Management determined that no additional or special inspection or patrol activities were needed to assess tree conditions in advance of forecasted RFW or Santa Ana events.¹⁵⁴ It also explained that during all declared RFW and/or a Santa Ana wind events in 2024, the scheduled routine and off-cycle HFTD inspections continued unabated throughout the service territory.

Additionally, SDG&E provided a copy of their Vegetation Management training presentations and attendance roster for 2024, demonstrating that vegetation management personnel attended Emergency Operations training for improved situational awareness and resource coordination.¹⁵⁵

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

Finding – 8.2.3.8 Emergency Response of Vegetation Management

SDG&E provided information consistent with the completion of work identified in this initiative. Therefore, Energy Safety concludes that initiative 8.2.3.8 Emergency Response of Vegetation Management is complete.

¹⁵² San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 279 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true>).

¹⁵³ Data Request OEIS-E-SVM_2025-SDG&E-002, Question 16; attachment: Response 16.

¹⁵⁴ Data Request OEIS-E-SVM_2025-SDG&E-001, Question 27; Response 27.

¹⁵⁵ Data Request OEIS-E-SVM_2025-SDG&E-001, Question 28; attachment: “SVM_2025-SDGE-001_Q28.zip.”

8.2.4 Vegetation Management Enterprise System

The purpose of this initiative is the “[o]peration of and support for centralized vegetation management and inspection enterprise system(s) updated based upon inspection results and activities such as hardening, maintenance, and remedial work.”¹⁵⁶

Narrative Statements, Supporting Information, and Analysis

Statement 15

Statement: In its 2023-2025 WMP, SDG&E included the following list of improvements made to its vegetation management enterprise system since its last WMP submission:

- The addition of new genus and species attribute fields which enable improved identification granularity within the tree records
- Additional new map layers and updated photo imagery within Epoch for improved situational awareness and field planning
- New SWOs specific to the off-cycle HFTD patrol (WMP.508) activity for better planning, documentation, and reporting
- New mapping capabilities to electronically track and document inspection progression
- New data fields to electronically record customer refusals and other deferred work which negates the need for hard copy forms
- Creation of a refusal/deferred work dashboard to track and manage time-sensitive tree work¹⁵⁷

Supporting Information and Analysis: SDG&E provided screenshots of *Epoch* demonstrating that SDG&E added new genus and species attribute fields, updated map layers (e.g. tribal property boundary) and aerial imagery.¹⁵⁸ These screenshots also demonstrated that within Cityworks, SDG&E added new Schedule Work Orders (SWO) for Off-Cycle HFTD patrols. It was also demonstrated that SDG&E has new mapping capabilities in *Epoch*, allowing it to electronically track and document inspection progress of OH lines. Additionally, *Epoch* now allows customer refusals and other deferred work to be electronically recorded and can generate a dashboard summarizing refusal/deferred work occurrences.

¹⁵⁶ Office of Energy Infrastructure Safety, [2023-2025 Base Wildfire Mitigation Plan Technical Guidelines](#), Published December 6, 2022, p. A-24, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

¹⁵⁷ San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 281 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true>).

¹⁵⁸ Data Request OEIS-E-SVM_2025-SDG&E-001, Question 29; attachment: “SDG&E_SVM_2024_Q29.pdf.”

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

Finding – 8.2.4 Vegetation Management Enterprise System

SDG&E provided information consistent with the completion of work identified in this initiative. Therefore, Energy Safety concludes that initiative 8.2.4 Vegetation Management Enterprise System is complete.

8.2.5 Quality Assurance and Quality Control

The purpose of this initiative is the “[e]stablishment and function of audit process to manage and confirm work completed by employees or contractors, including packaging QA/QC information for input to decision-making and related integrated workforce management processes.”¹⁵⁹

Narrative Statements, Supporting Information, and Analysis

SDG&E’s WMP included QA/QC goals for both the number of sites required for representative sampling for QA/QC of its Vegetation Management Activities and target pass rates for these activities.¹⁶⁰ SDG&E’s actual sample sizes and pass rates are compared to their respective targets in the table below. Missed targets are bold.

QA/QC Program	Target Percentage of Work QA/QC Inspected	Actual Percentage of Work QA/QC Inspected	Target Pass Rate	Actual Pass Rate
Pre-Inspection Audits	12-15%	96%	95%	94%
Tree Trimming Audits	12-15%	23%	95%	94%
Pole Clearing Work Audits	12-15%	23%*	95%	99%
Off-Cycle HFTD Trim Audit	100%	99%	95%	99%
Tree Trim “Memo” Work Audit	100%	92%	95%	96%

*SDG&E provided conflicting data regarding the total number of poles cleared as discussed above in section 8.3.2.1 Pole Clearing; for the purposes of determining percentage of work receiving QC inspections, Energy Safety utilized the Excel file provided in response to its data request regarding QA/QC.¹⁶¹

¹⁵⁹ Office of Energy Infrastructure Safety, [2023-2025 Base Wildfire Mitigation Plan Technical Guidelines](#), Published December 6, 2022, p. A-24, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

¹⁶⁰ San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, pp. 281-283 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true>).

¹⁶¹ Data Request OEIS-E-SVM_2025-SDG&E-002, Question 17; attachment: “SVM_2025-SDGE-002_Q17.xlsx”

SDG&E's actual percentage of work sampled for its QA/QC inspections was calculated by dividing the total number of QA/QC inspections completed by the total work completed (e.g., total trees inspected, total poles cleared, total trims completed). This analysis is summarized in the table below. SDG&E's actual pass rate was calculated by dividing the percentage of inspections which passed the QA/QC audit by the total number of QA/QC inspections conducted as described below.

QA/QC Program	Actual Percentage of Work QA/QC Inspected	Actual Pass Rate
Pre-Inspection Audits	85,159 tree units audited/ 88,483 tree units in routine inspections = 96% of work audited ¹⁶²	80,371 tree units passed audit/ 85,159 tree units audited = 94% pass rate ¹⁶³
Tree Trimming Audits	40,035 tree units audited/ 173,857 tree units mitigated =23% of work audited ¹⁶⁴	37,537 tree units passed audit/ 40,227 tree units audited =94% pass rate ¹⁶⁵
Pole Clearing Work Audits*	8,400 poles audited/36,457 poles cleared =23% of work audited ¹⁶⁶	8,274 poles passed /8,400 poles audited = 99% pass rate ¹⁶⁷
Off-Cycle HFTD Trim Audit	1,422 tree units audited / 1,431 tree units trimmed = 99% of work audited ¹⁶⁸	1,418 tree units passed audit/ 1,422 tree units audited = 99% pass rate ¹⁶⁹
Tree Trim "Memo" Work Audit	1,924 tree units audited/2,082 tree units mitigated = 92% of work audited ¹⁷⁰	1,847 tree units passed audit/ 1,924 tree units audited = 96% pass rate ¹⁷¹

*SDG&E provided conflicting data regarding the total number of poles cleared as discussed above in section 8.3.2.1 Pole Clearing; for the purposes of determining percentage of work receiving QC inspections, Energy Safety utilized the Excel file provided in response to its data request regarding QA/QC.¹⁷²

Conclusion: SDG&E did not provide information consistent with the completion of work identified for this target.

¹⁶² Data Request OEIS-E-SVM_2025-SDG&E-001, Question 30; attachment: "SVM_2025-SDGE-001_Q30.xlsx."

¹⁶³ Data Request OEIS-E-SVM_2025-SDG&E-001, Question 30; attachment: "SVM_2025-SDGE-001_Q30.xlsx."

¹⁶⁴ Data Request OEIS-E-SVM_2025-SDG&E-001, Question 31; attachment: "SVM_2025-SDGE-001_Q31.xlsx."

¹⁶⁵ Data Request OEIS-E-SVM_2025-SDG&E-001, Question 31; attachment: "SVM_2025-SDGE-001_Q31.xlsx."

¹⁶⁶ Data Request OEIS-E-SVM_2025-SDG&E-001, Question 32; attachment: "SVM_2025-SDGE-001_Q32.xlsx."

¹⁶⁷ Data Request OEIS-E-SVM_2025-SDG&E-001, Question 32; attachment: "SVM_2025-SDGE-001_Q32.xlsx."

¹⁶⁸ Data Request OEIS-E-SVM_2025-SDG&E-002, Question 17; attachment: "SVM_2025-SDGE-002_Q17.xlsx."

¹⁶⁹ Data Request OEIS-E-SVM_2025-SDG&E-001, Question 17; attachment: "SVM_2025-SDGE-002_Q17.xlsx."

¹⁷⁰ Data Request OEIS-E-SVM_2025-SDG&E-001, Question 34; attachment: "SVM_2025-SDGE-001_Q34.xlsx."

¹⁷¹ Data Request OEIS-E-SVM_2025-SDG&E-001, Question 34; attachment: "SVM_2025-SDGE-001_Q34.xlsx."

¹⁷² Data Request OEIS-E-SVM_2025-SDG&E-001, Question 32; attachment: "SVM_2025-SDGE-001_Q32.xlsx."

Statement 16

Statement: “SDG&E uses a randomized, representative sample of all completed vegetation management work for the purposes of auditing. A sampling of 12 to 15 percent is used for all activities. Randomization of post trim audit samples include representation of multiple tree crews”¹⁷³

Supporting Information and Analysis:

8.2.5 Pre-Inspection Work Audit Activities: SDG&E provided an Excel file showing pre-inspection audit activities that were conducted in performance year 2024.¹⁷⁴ The file contained the Tree ID, number of Tree Units cleared following routine pre-inspection, longitude and latitude, the date each tree was inspected, the date (if any) that the inspection work on each tree was audited, the results of each audit (pass or fail), and the reason the audit was failed. From this file, approximately 96% of clearance work following routine pre-inspections were audited in performance year 2024 thus meeting the QA/QC sample size goal. OEIS Table 8-18 in SDG&E’s WMP gives a target pass rate of 95% for pre-inspections.¹⁷⁵ The file demonstrates that approximately 94% tree units audited in 2024 passed their audit and did not meet this QA/QC pass rate goal.

8.2.5 Tree Trimming Work Audit Activities: SDG&E provided an Excel file showing all tree trimming and removal work completed in 2024 and associated audit work orders in performance year 2024.¹⁷⁶ The file contained the Tree ID, number of Tree Units, longitude and latitude, the date vegetation management work was completed, the date (if any) that each vegetation management work was audited, the results of each audit (pass or fail), and the reason the audit was failed. From this file, a total of 173,857 tree units received clearance work in 2024 and approximately 23% of these tree units were audited in performance year 2024 thus meeting the QA/QC sample size goal. OEIS Table 8-18 in SDG&E’s WMP gives a target pass rate of 95% for vegetation management work.¹⁷⁷ The file demonstrates that approximately 94% tree units audited for vegetation management work passed their audit and thus SDG&E did not meet its QA/QC pass rate goal.

¹⁷³ San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 282 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true>).

¹⁷⁴ Data Request OEIS-E-SVM_2025-SDG&E-001, Question 30; attachment: “SVM_2025-SDGE-001_Q30.xlsx.”

¹⁷⁵ San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 283 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true>).

¹⁷⁶ Data Request OEIS-E-SVM_2025-SDG&E-001, Question 31; attachment: “SVM_2025-SDGE-001_Q31.xlsx.”

¹⁷⁷ San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 283 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true>).

8.2.5 Pole Clearing Work Audit Activities: SDG&E provided an Excel file documenting all pole clearing work audit activities that were conducted in performance year 2024.¹⁷⁸ The file contained the Pole ID, number of Pole Units, longitude and latitude, the date each pole was cleared, the date (if any) that each pole clearing activity was audited, the result of each audit (pass or fail), and the reason an audit was failed. From this file, 36,457 poles were cleared in 2024 and approximately 23% of those poles were audited in performance year 2024 thus meeting the QA/QC sample size goal. OEIS Table 8-18 in SDG&E's WMP gives a target pass rate of 95% for pole clearing.¹⁷⁹ The file demonstrates that approximately 98% of the audited poles passed their audit and thus SDG&E met its QA/QC pass rate goal.

As noted in Section 8.3.2.1, Energy Safety identified an inconsistency in the number of poles reportedly cleared in performance year 2024. According to the file "SVM_2025-SDGE-001_Q12.xlsx" 36,001 poles were cleared in 2024 and in the file "VM_2025-SDGE-001_Q32.xlsx" 36,457 poles were cleared. SDG&E did not provide information to clarify why there is a discrepancy between the two files, which were submitted in response to data request OEIS-E-SVM_2025-SDG&E-001 in response to different questions related to pole clearing. Energy Safety requires that SDG&E ensure accuracy within the data submitted. Despite the inconsistent numbers reported, both exceeded the target resulting in Energy Safety's conclusion that the information provided demonstrated the completion of work for its pole clearing QA/QC goals.

Conclusion: SDG&E did not provide information consistent with the completion of work identified for this statement.

Statement 17

Statement: "A higher sampling percentage is used for some enhanced vegetation management activities in the HFTD, including a 100 percent post-trim audit of all completed trim and removal work generated from the off-cycle patrol (WMP.508) activities. This target may not be achieved in some instances due to inaccessibility of work locations and/or customer refusals. Additionally, audits are performed on 100 percent of all work completed on tree trim "Memo" work orders."¹⁸⁰

¹⁷⁸ Data Request OEIS-E-SVM_2025-SDG&E-001, Question 32; attachment: "SVM_2025-SDGE-001_Q32.xlsx."

¹⁷⁹ San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 283 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true>).

¹⁸⁰ San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 282 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true>).

Supporting Information & Analysis:

8.2.5 Off-Cycle Trim Audit Activities: As described in section 8.2.2.2 Off-Cycle Patrols above, SDG&E provided an Excel File of its HFTD patrol trees.¹⁸¹ This file documented a total of 1,431 tree units which received vegetation management work in performance year 2024 (Tree Removal or Tree Trim) as a result of off-cycle HFTD patrols in 2024.¹⁸²

SDG&E also provided an Excel file which documented all Post- Trim audits of completed trim and removal work generated from the off-cycle patrols.¹⁸³ The file included the Tree ID, number of Tree Units, longitude and latitude, the off-cycle (enhanced) patrol inspection date, HFTD designation, the type of vegetation management work completed, the date tree work was completed on each tree, the date the tree work was audited, the result of each audit (pass or fail), and the reason an audit was failed. In this narrative commitment, SDG&E gives a target to conduct QA/QC inspections on 100% of tree units trimmed or removed in HFTDs as a part of the off-cycle patrols.¹⁸⁴ Based on the Excel file provided, 99% (1,422 out of 1,431) of tree units, trimmed or removed in HFTDs as a part of the off-cycle patrols, received a QA/QC audit.¹⁸⁵ Regarding the nine tree units (seven unique tree IDs) that did not receive a QA/QC audit, SDG&E stated that work on these trees had a deferred work status at the time of the HFTD off-cycle patrol audits. SDG&E further clarified that trees with deferred and pending resolution during the time of the HFTD off cycle patrol audit were not included within the audit population and stated that they do not count towards the completion of the target sample size.¹⁸⁶ However, SDG&E did not provide justification for deferring the work of these nine tree units. Therefore, SDG&E did not meet the 100% completion of QA/QC audits for off-cycle HFTD vegetation completed work. Additionally, OEIS Table 8-18 in SDG&E's WMP gives a target pass rate of 95% for vegetation management work.¹⁸⁷ The provided file demonstrates that approximately 99% of tree units passed their post- enhanced vegetation management work audit in 2024 and thus SDG&E met the QA/QC pass rate goal.

8.2.5 Tree Trim “Memo” Work Audit Activities: SDG&E provided an Excel file showing all work completed on tree trim “Memo” work orders in 2024.¹⁸⁸ The file included the Tree ID,

¹⁸¹ Data Request OEIS-E-SVM_2025-SDG&E-001, Question 7; attachment: “SVM_2025-SDGE-001_Q7.xlsx.”

¹⁸² Data Request OEIS-E-SVM_2025-SDG&E-001, Question 7; attachment: “SVM_2025-SDGE-001_Q7.xlsx.”

¹⁸³ Data Request OEIS-E-SVM_2025-SDG&E-002, Question 17; attachment: “OEIS-E-SVM_SDG&E-002_Q17.xlsx .”

¹⁸⁴ San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 283 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true>).

¹⁸⁵ Data Request OEIS-E-SVM_2025-SDG&E-001, Question 7; attachment: “SVM_2025-SDGE-001_Q7.xlsx.”

¹⁸⁶ Data Request OEIS-E-SVM_2025-SDG&E-002, Question 17; Response 17.

¹⁸⁷ San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 283 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true>).

¹⁸⁸ Data Request OEIS-E-SVM_2025-SDG&E-001, Question 34 attachment: “SVM_2025-SDGE-001_Q34.xlsx.”

number of Tree Units and longitude and latitude, HFTD designation, the date the “Memo” work was completed on each tree, the date the “Memo” work was audited, the result of each audit (pass or fail), and the reason an audit was failed. In this narrative commitment, SDG&E gives a target to conduct QA/QC inspections on 100% of “Memo” work orders.¹⁸⁹ From the Excel file provided, a total of 2,082 tree units in HFTDs had “Memo” work performed. According to this file, approximately 92% (1,924 out of 2,082) received an audit in performance year 2024. Therefore, SDG&E did not meet the 100% completion of QA/QC audits for “Memo” work orders. Additionally, OEIS Table 8-18 in SDG&E’s WMP gives a target pass rate of 95% for vegetation management work.¹⁹⁰ The file demonstrates that approximately 96% Memo Tree units passed their audit and met the QA/QC pass rate goal.

Conclusion: SDG&E provided information consistent with the 95% pass rate goal but did not meet the 100% completion of QA/QC audits for off-cycle HFTD vegetation completed work. SDG&E also provided information consistent with the 95% pass rate goal but did not provide information consistent with the 100% completion of QA/QC audits for tree trim “Memo” work orders.

Statement 18

Statement: During the post-trim QA/QC audit activity (WMP.505), an audit contractor performs a cursory vegetation inspection of all overhead lines within each VMA. This activity occurs 6 to 8 months following the routine scheduled detailed inspection activity and serves as a “mid-cycle” patrol to ensure vegetation does not pose a compliance or safety risk to the lines prior to the next inspection activity.”¹⁹¹

Supporting Information and Analysis: SDG&E provided an Excel file showing it conducted cursory vegetation inspections of 281,853 distribution, transmission, and secondary overhead electric lines (Level 1 “mid-cycle” patrol) Vegetation Inspections (WMP .505).¹⁹² To assess completion of this statement, Energy Safety calculated the time difference between the routine inspection end date and mid-cursory start date. The file demonstrated that approximately 79% of the cursory vegetation inspections began less than 6 months after the routine detailed inspection and 21% of QA/QC audit inspections began 6 to 8 months

¹⁸⁹ San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 283 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true>).

¹⁹⁰ San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 283 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true>).

¹⁹¹ San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 265 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true>).

¹⁹² Data Request OEIS-E-SVM_2025-SDG&E-001, Question 5; attachment: “OEIS-E-SVM_SDG&E-002_Q5.xlsx.”

following the routine scheduled detailed inspection activity. Less than 1% of the cursory vegetation inspections began more than 8 months after the routine detailed inspection.

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

Finding – 8.2.5 Quality Assurance and Quality Control

SDG&E did not provide information consistent with the completion of work identified in this initiative. Therefore, Energy Safety concludes that initiative 8.2.5 Quality Assurance and Quality Control is deficient.

In its CAP, SDG&E must provide corrective actions to address its sample size and pass rate deficiencies identified above.

8.2.6 Open Work Orders

The purpose of this initiative is to take actions “to manage the electrical corporation’s open work orders resulting from inspections that prescribe vegetation management activities.”¹⁹³

Narrative Statements, Supporting Information, and Analysis

Statement 19

Statement: “Routine work is generally scheduled to be completed within 120 days of inspection, whereas priority work is generally scheduled to be completed within 30 days of inspection.”¹⁹⁴

Supporting Information and Analysis: SDG&E provided an Excel file documenting all routine and priority work identified in 2024.¹⁹⁵ This file included the Unique Tree IDs, longitude and latitudes, the inspection date, the date each work order was completed (trim or removal) and the reason behind delayed work orders. The number of priority and routine work orders and completion times documented in this file are summarized in the table below. Percentages represent the proportion of work orders within that time frame that were completed on time.

¹⁹³ Office of Energy Infrastructure Safety, [2023-2025 Base Wildfire Mitigation Plan Technical Guidelines](#), Published December 6, 2022, p. A-24, URL:

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

¹⁹⁴ San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 285 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true>).

¹⁹⁵ Data Request OEIS-E-SVM_2025-SDG&E-001, Question 35; attachment: “SVM_2025-SDGE-001_Q35.xlsx.”

Open Work Order Prioritization	Target Timeframe	Total Work Orders	Total Work Orders Meeting Target
Routine Work	120 days	112,770	93,668 (83%)
Priority Work	30 days	3,160	1,966 (62%)
Total Work	--	115,930	95,634 (82%)

Energy Safety amended the findings highlighted in this table upon further analysis of the data SDG&E provided in "SVM_2025-SDGE-001_Q35.xlsx.". Upon further analysis, Energy Safety found that total work orders meeting the target were higher than what was found in the VMA. The findings in this table reflect these updates.

According to this file, 115,930 total work orders were issued in performance year 2024. Of these work orders 97% (112,770 out of 115,930) were routine work orders and 3% (3,160 out of 115,930) were priority work orders. From the inspections resulting in routine work orders, approximately 83% of them were completed in 120 days or less, and 16% were completed more than 120 days after inspection. Of the 16% of routine work orders completed in over 120 days, SDG&E did not provide a reason for the delay in 97% of the cases. From the inspections resulting in priority work orders, 61% were completed in 30 days or less, and 31% were completed more than 30 days after inspection. Of the 31% of priority work orders completed in over 30 days, SDG&E did not provide a reason for the delay in 94% of the cases.

Conclusion: SDG&E did not provide information consistent with completion of this statement.

Finding – 8.2.6 Open Work Orders

SDG&E did not provide information consistent with the completion of work identified in this initiative. Therefore, Energy Safety concludes that initiative 8.2.6 Open Work Orders is deficient.

In its CAP, SDG&E must provide an update for any of the pending mitigation work identified by Energy Safety in Initiative 8.2.6 Open Work Orders. For work that remains incomplete, SDG&E must outline corrective actions to resolve outstanding issues or propose alternative solutions, and/or submit documentation describing the constraints which prevented the completion of this work. SDG&E must also provide corrective actions to prevent similar delays in future performance years.

8.2.7 Workforce Planning

The purpose of this initiative is that “[p]rograms...ensure that the electrical corporation has qualified vegetation management personnel and to ensure that both employees and

contractors tasked with vegetation management responsibilities are adequately trained to perform relevant work.”¹⁹⁶

Narrative Statements, Supporting Information, and Analysis

SDG&E included the following information regarding Special Certification Requirements in Table 8-20 of its 2023-2025 WMP.¹⁹⁷

Auditors	Tree Trimmers	Pre-Inspectors
International Society of Arboriculture (ISA) Certified Arborist	Line Clearance qualified arborist certification (or trainee)	International Society of Arboriculture (ISA) Certified Arborist

Supporting Information & Analysis: To demonstrate that vegetation management staff were qualified for vegetation management work, SDG&E submitted an Excel file detailing contractor qualification.¹⁹⁸ Among SDG&E’s four contractors and SDG&E’s staff, there was a total of 244 employees for which SDG&E provided job titles. Of these employees, 11 were auditors and they all had an ISA number, 57 were tree trimmers (or trainees) and they all had a Line Clearance qualified arborist certification, 21 were pre-inspectors and they all had an ISA number.

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

Statement 20

Statement: “Contractors are additionally required to perform in-house annual refresher 2023-2025 Wildfire Mitigation Plan training that includes the following modules: fire preparedness, environmental protection, hazard tree assessment, and customer service.”¹⁹⁹

Supporting Information and Analysis: SDG&E provided documentation such as 2024 training presentations and attendance sheets for its four vegetation management contractors indicating that their vegetation management staff completed fire preparedness,

¹⁹⁶ Office of Energy Infrastructure Safety, [2023-2025 Base Wildfire Mitigation Plan Technical Guidelines](#), Published December 6, 2022, p. A-24, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

¹⁹⁷ San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 287-289 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true>).

¹⁹⁸ Data Request OEIS-E-SVM_2025-SDG&E-001, Question 42; attachment: “SVM_2025-SDGE-001_Q42.xlsx.”

¹⁹⁹ San Diego Gas & Electric Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 7, 2024, p. 285 URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true>).

environmental protection, hazard tree assessment, and customer service trainings (8.2.7 Contractor Wildfire Mitigation Plan training).²⁰⁰

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

Finding – 8.2.7 Workforce Planning

SDG&E provided information consistent with the completion of work identified in this initiative. Therefore, Energy Safety concludes that initiative 8.2.7 Workforce Planning is complete.

²⁰⁰ Data Request OEIS-E-SVM_2025-SDG&E-001, Question 41; attachment: "SVM_2025-SDGE-001_Q39-Q41.zip."



APPENDIX 2. San Diego Gas and Electric Company 2024 Corrective Action Plan



APPENDIX DESCRIPTION

SDG&E submitted its corrective action plan (CAP) to Energy Safety on October 30, 2025.

This appendix reproduces that CAP response in its entirety.

October 30, 2025

Page 1



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October 30, 2025

VIA EMAIL

Karen McLaughlin
Supervisory Environmental Scientist
Environmental Sciences Division
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

Re: SDG&E 2024 WMP Vegetation Management Audit Corrective Action Plan

Dear Karen McLaughlin:

San Diego Gas & Electric (“SDG&E”) hereby provides this corrective action plan (“CAP”), as well as supporting documentation, in response to the Office of Energy Infrastructure Safety’s (“Energy Safety”) Audit of San Diego Gas and Electric Company’s 2024 WMP Vegetation Management Commitments (“Audit”) issued on October 2, 2025. The Audit evaluated all relevant data provided to Energy Safety by SDG&E to substantiate completion of all vegetation management work commitments in qualitative statements and quantitative targets in its 2023-2025 Wildfire Mitigation Plan (“WMP”) during performance year 2024. For each initiative in Section 8.2 (Vegetation Management and Inspections) of SDG&E’s 2023-2025 WMP, the Audit assessed quantitative targets and commitments as well as verifiable, narrative statements for completion. The Audit found that SDG&E provided data and documentation to support completion of work for eight of the 13 initiatives and did not provide information and documentation to support completion of work for five initiatives.

As a result of these findings, Energy Safety directed SDG&E to provide additional data or clarifications to Energy Safety for the five deficient initiatives as part of this CAP. Energy Safety also directed SDG&E to provide specific responses to each finding (shown in italics) which are included in the discussion below. A table summarizing SDG&E’s corrective actions also follows below.

Table 1: Summary of SDG&E’s Corrective Actions

Programmatic Area	Vegetation Management Initiative	WMP Commitment	SDG&E Corrective Action
8.2.3. Vegetation and Fuels Management	8.2.3.2 Wood and Slash Management	8.2.3.2 Fuels Management (WMP .497), Quantitative Target	SDG&E has reinstated its target of 500 poles for the initiative and is on track to reach this target in 2025.
8.2.3. Vegetation and Fuels Management	8.2.3.2 Wood and Slash Management	8.2.3.2 Wood and Slash Debris Management (WMP .497), Statement 6	New attribute field created within SDG&E’s electronic work management system, EpochField, to record whether wood debris is left on site at a property during tree pruning and removal operations.
8.2.3. Vegetation and Fuels Management	8.2.3.4 Fall-In Mitigation	8.2.3.4 Complete prescribed mitigations (WMP .508 and WMP. 494)	SDG&E will establish a method of tracking and validating the completion of all mitigations to include deferred work (customer refusals and exceptions) to ensure a timely and complete follow-up. Additionally, for future data request responses, SDG&E will modify its data extraction methodology and description of its data to ensure requisite detail and description to avoid confusion or miscommunication.
8.2.3. Vegetation and Fuels Management	8.2.3.5 Substation Defensible Space	8.2.3.5 Substation Patrol Inspections (WMP.492)	N/A. See discussion in Section III below.
8.2.5 Quality Assurance and Quality Control	8.2.5. Quality Assurance and Quality Control	8.2.5 Pre-Inspection Audit Activities (WMP .505)	In 2025, SDG&E began a method of tracking the completion of all work associated with the off-cycle HFTD work and the “Memo” work and its associated, unique QA/QC work order to ensure audit completion of each tree record associated with the audit.
8.2.5 Quality Assurance and Quality Control	8.2.5. Quality Assurance and Quality Control	8.2.5 Tree Trimming Audit Activities (WMP .505)	In 2025, SDG&E began a method of tracking the completion of all work associated with the off-cycle HFTD work and the “Memo” work and its associated, unique QA/QC work order to ensure audit completion of each tree record associated with the audit.

Programmatic Area	Vegetation Management Initiative	WMP Commitment	SDG&E Corrective Action
8.2.5 Quality Assurance and Quality Control	8.2.5. Quality Assurance and Quality Control	8.2.5 Off-Cycle Trim Audit Activities (WMP .505)	In 2025, SDG&E began a method of tracking the completion of all work associated with the off-cycle HFTD work and the “Memo” work and its associated, unique QA/QC work order to ensure audit completion of each tree record associated with the audit.
8.2.5 Quality Assurance and Quality Control	8.2.5. Quality Assurance and Quality Control	8.2.5 Tree Trim “Memo” Work Audit Activities: (WMP .505)	In 2025, SDG&E began a method of tracking the completion of all work associated with the off-cycle HFTD work and the “Memo” work and its associated, unique QA/QC work order to ensure audit completion of each tree record associated with the audit.
8.2.6 Open Work Orders	8.2.6 Open Work Orders	8.2.6 Completion of Routine and Priority Work After Inspection	SDG&E will continue to modify and improve how delayed work is tracked and reported. Such action will consist of creating a work schedule dashboard (completed in early 2025), recurring and targeted meetings with the tree contractors to review status of all pending tree work and crew resource allocation, early planning and coordination of work requiring environmental review or permitting, and proactive communication with historic refusal customers.

I. 8.2.3.2 Vegetation and Fuels Management – Wood and Slash Management

SDG&E must provide justification for why its fuel management target was missed and a corrective action response addressing the deficiencies identified in its wood and slash removal programs. SDG&E may also expand upon if and how Epoch will alleviate the deficiency described.

Initiative Number:	8.2.3.2 Vegetation and Fuels Management-Wood and Slash Management
Finding:	Failure to provide information consistent with the completion of all work identified in initiative 8.2.3.2 Wood and Slash Management.

In its conclusion of the review of initiative 8.2.3.2 Vegetation and Fuels Management-Wood and Slash Management, Energy Safety noted SDG&E did not provide information consistent with the completion of work identified in this target completing 147 poles of the 500 pole target. To evidence completion of work, SDG&E provided in response to Question 11 of data request “SVM_2025-SDGE-001” an Excel sheet containing all activities where SDG&E performed Fuels Management in 2024.

In its Petition to Amend dated April 10, 2025, SDG&E requested amendment to reduce this program to 150 poles in 2024 from the approved 500 poles.¹ SDG&E requested this amendment due to an internal executive strategic decision to find cost efficiencies without increasing wildfire risk, consider affordability measures, and align with the pending GRC Settlement Agreement. As SDG&E described in its *2024 Wildfire Mitigation Plan Annual Report on Compliance* (dated April 1, 2025):

“SDG&E thoughtfully selected reductions to mitigations in order to align with anticipated cost reductions without unreasonably introducing additional wildfire risk. SDG&E notes that, despite these reductions in targets, the Company’s successful mitigation of wildfire risk in 2024 was demonstrated by the fact that, during historically dry conditions at the end of 2024 and 2025 and high fire risk weather during January 2025, SDG&E’s infrastructure, situational awareness, and emergency operations practices resulted in no utility-related wildfires.”

With respect to this specific program, SDG&E additionally noted:

“Because poles in the service territory are still maintained under the Pole Clearing activity as required under PRC§4292, risks for pausing the Fuels Management Program were considered low.”

In its review of SDG&E’s Annual Report on Compliance of its 2024 WMP², the third-party auditor noted:

¹ *San Diego Gas & Electric Company 2025 Petition to Amend* (April 10, 2025).

² *Independent Evaluator: Annual Report on Compliance for Wildfire Mitigation Plan Compliance Year 2024, June 30, 2025.*

“This reduction was informed by the knowledge that the remaining poles in the fuels management initiative would be addressed by other risk-reducing vegetation measures such as pole clearing (WMP.512). Based upon this reasoning and the verification of completion of work related to WMP.512 realistically determines that the risk reduction goal for this initiative has been met”.

The third-party auditor additionally stated:

“The Fuels Management Program was the only initiative that missed its target, completing only 29% of projected work. This appears to be due to a strategic reduction of work completed in anticipation of a pending GRC decision. However, this shortfall was offset by overachievement in the related Pole Clearing program, which exceeded its target by 11%”. service territory are still maintained under the Pole Clearing activity as required under PRC§4292, risks for pausing the Fuels Management Program were considered low”.

On July 11, 2025, Energy Safety denied SDG&E’s requested reduction of this program³, and SDG&E thus acknowledges it did not complete the work identified in this target. As a corrective action, and in alignment with the final GRC decision issued by the CPUC in December 2024 to fund the Fuels Management Program, SDG&E has reinstated its target of 500 poles for the initiative and is on track to reach this target in 2025.

In its conclusion of the review of Statement 6 of the SVM Audit, Energy Safety noted SDG&E did not provide information consistent with the completion of removal of “most of the wood and slash debris resulting from routine trimming and removal...” SDG&E maintains that, per its standard operating procedures and tree trimming vendor contracts, wood and slash debris are removed from tree trimming sites unless the customer specifically requests otherwise.

SDG&E acknowledges, however, that SDG&E’s tree level data regarding this program does not specifically include acknowledgement of the removal of wood and slash debris. SDG&E explained in its 2023-2025 WMP that its standard operating protocol is to remove all wood and slash debris associated with tree operations from properties except for large, woody material which is left on site. Large, woody material is generated during large diameter tree branch pruning associated with hazard trees, and large diameter removals. Where such work occurs, the residual large wood is cut into manageable lengths for customer use or disposal. SDG&E does not specifically record for each tree trimmed or removed whether woody debris was left on site, but these terms are also included in SDG&E’s agreements with tree trimming vendors.

As a corrective action, SDG&E has created a new attribute field within its electronic work management system, *EpochField*, to record whether wood debris is left on site at a property during tree pruning and removal operations. This documentation occurs at the tree level within each record by the tree crew as a binary (Yes/No) question stating whether wood/debris was removed. This new documentation process was implemented in August 2025. An example of this new attribute field is provided in the screenshot below.

³ Office of Energy Infrastructure Safety Decision for San Diego Gas & Electric Company’s 2025 Petition to Amend to its 2023-2025 Base Wildfire Mitigation Plan (July 11, 2025).

Figure 1: Example of New Wood Debris Attribute in EpochField

Common/Genus:	CCode:	Clearance:	Growth:	Height:	DBH:	Trunks:	Units:	Stems:	Access:	Inventory:
Coast Live Oak / Quercus agrifolia	Completed Pruning	12.0 to 14.9 ft	Slow	15.1 to 20.0 ft	3.0 to 7.9 in	1	1	1	Climb	Yes
ESA:	Traffic:	Voltage:	HFTD:	Tie Line:	Wood Removed:					
No	No	Primary Distribution	Tier-2	None	Yes					
Structure ID 1:	Structure ID 2:									
P213318	P213319									
Last Inspection Date:	Last Trim Date:									
05/06/2025 12:40:38 PM	10/01/2025 04:03:20 PM									

II. 8.2.3.4 Fall-In Mitigation

SDG&E must provide updated records demonstrating completion of all mitigations to address vegetation hazards identified during its detailed inspections program and corrective actions to ensure that such hazards are mitigated in a timely manner in future performance years.

Initiative Number:	8.2.3.4 Vegetation and Fuels Management-Fall-In Mitigation
Finding:	Failure to provide information consistent with the completion of work Fall-In Mitigation.

In its conclusion of the review of Statement 9 related to initiative 8.2.3.4 Fall-In Mitigation, Energy Safety noted that SDG&E did not provide information consistent with the completion of work to mitigate vegetation hazards identified during its detailed inspections. Energy Safety states, “For Detailed inspections [HFTD], SDG&E prescribed 79,604 mitigations and completed 73,358 of these mitigations along its distribution and transmission lines in performance year 2024 for a completion rate of 92%.”⁴ This data was extracted from the file provided by SDG&E titled “OEIS-E-SVM_SDG&E-002_Q4.xlsx”.

In its analysis, Energy Safety identified 6,246 mitigations as incomplete. SDG&E acknowledges that at the time of the SVM audit, some of its prescribed mitigations were not yet complete. After the initial pre-inspection activity, many of the originally prescribed mitigations missing a completion date in the SDG&E provided file titled, “OEIS-E-SVM_SDG&E-002_Q4.xlsx”, were subsequently determined to not require work. These tree records were coded, ‘PI, Cleared’, ‘No Work Required’, or ‘Deleted Tree’. The code, ‘PI, Cleared’, indicates that a second assessment of the tree was made by the pre-inspection and was cleared of work. The code, ‘No Work Required’, indicates a change in the condition of the tree between the pre-inspection and trim activity date which resulted in no work required. The code, ‘Deleted Tree’, identifies a tree that no longer meets the definition of the inventory, and no work was performed.

⁴ Audit, p. 26.

SDG&E acknowledges it did not clearly make the differentiation between mitigations that did not require work in the response initially provided in “OEIS-E-SVM_SDG&E-002_Q4.xlsx.”

Additionally, since the date of the original SVM data response, SDG&E was able to identify an additional 823 mitigations with a completed date (tree trimmed or removed) that initially contained a blank activity date in “OEIS-E-SVM_SDG&E-002_Q4.xlsx”.

Based on the above information, of the 6,246 mitigations identified by OEIS as incomplete, SDG&E has subsequently cleared or completed all but 185 of the initially prescribed mitigations. The incomplete mitigations include 147 work exceptions and 38 customer refusals. Exceptions are mitigations that were deferred because of environmental restrictions, permitting, or access. The data to validate this claim are included in the attached, amended data response to “OEIS-E-SVM_SDG&E-002_Q4” titled, “SDG&E_2024_VM_Audit_CAP_WMP.8.2.3.4_Attachment1.xlsx”. The data for the completed and non-completed mitigations can be found in column “N” titled, “Updated_Conditioncode”. Column “M”, titled, “Updated_ActivityDate”, illustrates the date of the completed or non-completed mitigations.

As a corrective action, SDG&E will establish a method of tracking and validating the completion of all mitigations to include deferred work (customer refusals and exceptions) to ensure a timely and complete follow-up. Additionally, for future data request responses, SDG&E will modify its data extraction methodology and description of its data to ensure requisite detail and description to avoid confusion or miscommunication.

III. 8.2.3.5 Substation Defensible Space

SDG&E must either provide documentation demonstrating that met its substation patrol inspections target or provide documentation to justify why the inspections were not required and corrective actions it will implement to ensure the target is met in future performance years.

Initiative Number:	WMP.492 Substation Defensible Space
Finding:	Failure to provide information consistent with the completion of work identified in this initiative.

As reported in SDG&E’s 2024 Report on Compliance, SDG&E achieved 99% completion of its projected target for Substation Patrol Inspections during the 2024 calendar year. The shortfall of five inspections was in part attributable to the decommissioning of two substations following the development of the initial forecast in late 2023. Additionally, inspection frequencies may shift between monthly and bi-monthly intervals based on established maintenance practices. These routine infrastructure adjustments and allowable maintenance practices influence the total number of inspections performed and may result in variances from the original forecast.

SDG&E considers work to be substantially complete when performance is within 10% of the established target and the intended risk reduction is achieved. For substation inspections,

SDG&E does not provide a specific risk assessment in the Wildfire Mitigation Plan (WMP), therefore, SDG&E considers the inspection program to have met its intended purpose.

IV. 8.2.5. Quality Assurance and Quality Control

SDG&E must provide corrective actions to address its sample size and pass rate deficiencies identified above.

Initiative Number:	8.2.5 Quality Assurance and Quality Control
Finding:	Failure to provide information consistent with the completion of work identified in Initiative 8.2.5 Quality Assurance and Quality Control.

In its conclusion of the review of Statement 16 of the SVM Audit, Energy Safety noted that SDG&E did not provide information consistent with the completion of work identified for this target.

To evidence completion of work, SDG&E provided in response to Questions 30, 31, & 32 of "SVM_2025-SDGE-001", an Excel sheet. Based on its analysis of the data provided, Energy Safety determined that the data provided was consistent with the 15% target sample size of work that was QA/QC inspected for Pre-Inspection, Tree Trimming, and Pole Clearing. However, although Energy Safety found that SDG&E had met its QA/QC Program's 95% target pass rate for Pole Clearing, it noted that the completed QA/QC target pass rate for Pre-Inspection Audits and Tree Trimming Audits was only 94%. Based on the analysis of the data provided, Energy Safety noted that SDG&E did not meet this QA/QC pass rate goal.

SDG&E acknowledges that the Pre-Inspection and Tree Trimming Audit each missed the pass rate goal by 1%, but believes achieving an audit pass rate of 94% for both initiatives represents a substantial completion of the target. As a corrective action, SDG&E will track and monitor audit pass rates consistently throughout the calendar year to manage contractor performance to meet the target goal by the end of the calendar year.

In its conclusion of the review of Statement 17 of the SVM Audit, Energy Safety noted that SDG&E did not provide information consistent with the 100% completion of QA/QC audits for off-cycle HFTD vegetation work or the 100% completion of QA/QC audits for tree trim "Memo" work orders. Energy Safety noted, however, a QA/QC audit completion rate of 99% and 92%, respectively, for off-cycle HFTD work and "Memo" work.

SDG&E acknowledges that the 100% QA/QC audit target was not completed for the off-cycle HFTD vegetation work and the tree trim "Memo" work, but believes achieving an audit completion rate of 99% and 92%, respectively, for off-cycle HFTD work and "Memo" work represents a substantial completion of the target. As a corrective action, in 2025, SDG&E began a method of tracking the completion of all work associated with the off-cycle HFTD work and the "Memo" work and its associated, unique QA/QC work order to ensure audit completion of each tree record associated with the audit.

V. 8.2.6 Open Work Orders

SDG&E must provide an update for any of the pending mitigation work identified by Energy Safety in Initiative 8.2.6 Open Work Orders. For work that remains incomplete, SDG&E must outline corrective actions to resolve outstanding issues or propose alternative solutions, and/or submit documentation describing the constraints which prevented the completion of this work. SDG&E must also provide corrective actions to prevent similar delays in future performance years.

Initiative Number:	8.2.6 Open Work Orders
Finding:	Failure to provide information consistent with the completion of work identified in Initiative 8.2.6 Open Work Orders

In its conclusion of the review of Statement 19 of the SVM Audit, Energy Safety noted SDG&E did not provide information consistent with the completion of routine and priority work within stated schedules. In the summary table provided in the SVM audit, Energy Safety indicates approximately 18% of total work orders were completed outside the schedule target.

To evidence completion of work, SDG&E provided in response to Questions 35 of “SVM_2025-SDGE-001”, an Excel file documenting all routine and priority work identified in 2024. SDG&E would like to note that all work identified in this file contains a work completion (trim or removal) date, which is documented in columns “K” and “L” in the Excel file. Accordingly, no work remains incomplete.

SDG&E submits that it has met both the spirit and technical statements in its WMP, which provide that “[r]outine work is generally scheduled to be completed within 120 days of inspection, whereas priority work is generally scheduled to be completed within 30 days of inspection.”⁵ SDG&E’s Vegetation Management Master Schedule is structured to provide a reasonable time-period to complete each activity annually within all VMAs that comprise the service territory. The ability to complete all required tree work within the scheduled timeframe for any specific VMA can be influenced by several factors including but not limited to customer refusals, environmental review and restrictions, property access restrictions, external agency review, permit application, etc. Additionally, work delays may occur from general fluctuations in the schedule of the tree contractors as they manage workload and crew resources to complete work. Together, these factors that may impact work schedules are why SDG&E’s work schedules are generalized rather than mandatory.

SDG&E endeavors to anticipate schedule delays where feasible through internal planning and scheduling by the SDG&E Area Foresters who manage the work. Efforts to prevent unnecessary delays to work completion may include proactive engagement with customers, recurring status meetings with tree contractors to manage crew resource levels and assignments, fostering positive work relationships with external stakeholders (e.g., cities, agencies, tribes, etc.), early permit initiation, and scheduling work outside bird nesting season.

SDG&E notes that its process of prioritizing work identified as having urgency enables timely completion of mitigation of the riskiest conditions. For example, mitigations with the most urgent

⁵ SDG&E’s 2023-2025 Wildfire Mitigation Plan at 285.

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condition are typically completed the same day or within 24 hours of inspection. Additionally, SDG&E's activities of detailed, off-cycle, targeted, and post-trim inspections enable multiple opportunities to identify and respond to risk conditions.

SDG&E recognizes that achieving schedule objectives is necessary to meet the overall objectives of the WMP in preventing wildfire and unnecessary risk on the system and achieving compliance with other applicable regulations. As a corrective action, SDG&E will continue to modify and improve how delayed work is tracked and reported. Such action will consist of creating a work schedule dashboard (completed in early 2025), recurring and targeted meetings with the tree contractors to review status of all pending tree work and crew resource allocation, early planning and coordination of work requiring environmental review or permitting, and proactive communication with historic refusal customers.

SDG&E appreciates the significant effort that Energy Safety put into the assessment of the implementation and execution of its 2024 WMP vegetation management work.

Respectfully submitted,

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