



March 10, 2026

Crystal Bertolini
Wildfire Mitigation Compliance
San Diego Gas and Electric Company
8316 Century Park Court, CP32F
San Diego, CA 92123

NOTICE OF NON-PERFORMANCE

Ms. Crystal Bertolini:

Pursuant to Government Code section 15472, et seq, the Office of Energy Infrastructure Safety (Energy Safety) has conducted an inspection of work completed by San Diego Gas and Electric Company (SDG&E) in accordance with its 2025 Wildfire Mitigation Plan (WMP) and determined the existence of non-performance requiring correction. Energy Safety therefore issues SDG&E a Notice of Non-Performance (NON).

On February 10, 2026, Energy Safety conducted an inspection of SDG&E's WMP initiatives in the vicinity of the city of Ramona, California in Hight Fire Threat District (HFTD) Tier 2 within the State Responsibility Area (SRA). The inspection report is enclosed herewith. Energy Safety found the following deficiency:

Deficiency 1. Energy Safety observed that in implementing 2025 WMP initiative 8.2.3.1 Pole Clearing (WMP.512), which requires compliance with Public Resources Code section 4292, SDG&E failed to remove all vegetation down to bare mineral soil within a 10-foot radius of pole ID P612225, near coordinates 33.01475, -116.86764. Energy Safety considers this non-performance to be in the Moderate risk category. SDG&E must complete a corrective action for this non-performance by six months from the date of this notice.¹

Within 30 days from the issuance date of this NON, SDG&E must provide a response advising Energy Safety of corrective actions taken or planned to remedy the identified deficiency.

This response shall be filed in the Energy Safety e-Filing system under the 2025 NON Docket² and the associated file name(s) must begin with the NON identification number.

Prior to its response, SDG&E may request an informal conference with Energy Safety for the purpose of disputing any issues raised in this NON no later than 10 business days before the response deadline.³ Requests

¹ Gov. Code section 15475.2(a)(2)

² <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2025%20NON>

³ Energy Safety Performance Guidelines, p. 4

for informal conference with Energy Safety must be e-mailed to environmentalscience@energysafety.ca.gov, with a copy sent to me and Elizabeth McAlpine, Eizabeth.McAlpine@energysafety.ca.gov.

Sincerely,



Sheryl Bilbrey
Program Manager | Environmental Science Division
Office of Energy Infrastructure Safety
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Cc:

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INSPECTION REPORT

Overview

The Office of Energy Infrastructure Safety (Energy Safety) conducts field inspections to verify the work performed by an electrical corporation as reported in an approved Wildfire Mitigation Plan (WMP), and to assess general conditions of electrical infrastructure that may adversely impact an electrical corporation’s wildfire risk. A Notice of Non-Performance (NON) is issued for any instances of non-performance identified during an inspection related to an electrical corporation’s execution of its WMP initiatives.

Energy Safety has designated this finding of deficiency as a “Moderate” risk. SDG&E must correct the deficiency pursuant to the timeline provided in Table 1.⁴

Table 1. Risk Category and Correction Timelines

Risk Category	Deficiency correction timeline
Severe	<ul style="list-style-type: none">• Immediate resolution
Moderate	<ul style="list-style-type: none">• 2 months (in High Fire Threat District (HFTD) Tier 3)• 6 months (in HFTD Tier 2)• 6 months (if relevant to worker safety; not in HFTD Tiers 2 or 3)
Minor	<ul style="list-style-type: none">• 12 months

⁴ Energy Safety Performance Guidelines, p. 4



Inspection Summary

Energy Safety found a “Moderate” deficiency at pole ID P612225 in HFTD Tier 2, SRA. SDG&E failed to remove a dry fuel source within the 10-foot radius of the pole.⁵

The inspection location and WMP initiative summary are included in Table 2.

Table 2: Inspection Location and Initiative Summary

Electrical Corporation:	SDG&E
Report Number:	NON_ESD_SDGE_RGA_20260210_1144
Inspector:	Ricardo Garcia
WMP Year Inspected:	2025
Quarterly Data Report (QDR) Referenced:	Quarter 3 (Q3) 2025
Inspection Selection:	Energy Safety inspected the locations based on SDG&E’s Q3 QDR.
Relevant WMP Initiative(s):	8.2.3.1 Pole Clearing (WMP.512)
Date of inspection:	February 10, 2026
City and/or County of Inspection:	Ramona, California

⁵ SDG&E “2023-2025 Base WMP”, published July 25, 2025. P. 278
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59036&shareable=true> accessed February 18, 2026).

Inspection Findings

Deficiency 1

Relevant Requirement:

SDG&E's WMP states its pole clearing program, initiative 8.2.3.1 (WMP.512), "is a fire prevention measure involving the removal of vegetation at the base of poles that carry specific types of electrical hardware that could cause sparking or molten material to fall to the ground. The clearance requirements in PRC § 4292 require the removal of all vegetation down to bare mineral soil within a 10-foot radius from the outer circumference of subject poles located within the boundary of the State Responsibility Area (SRA)."⁶

Findings:

Energy Safety considers this deficiency "Moderate" because a dead and desiccated eucalyptus stump remains within 10 feet of pole ID P612225. The continued presence of a dry, flammable stump poses an ongoing wildfire risk.

SDG&E's Q3 2025 QDR data indicated that SDG&E cleared the vegetation around pole ID P612225 under its 8.2.3.1 Pole Clearing (WMP.512) program, near GPS coordinates 33.01475, -116.86764 on August 10, 2025. On February 10, 2026, Energy Safety conducted an inspection and observed an approximately four-foot tall eucalyptus stump located about five feet from the base of the pole. The stump was dead and desiccated. Additionally, the pole is located within HFTD Tier 2 and SRA and is equipped with non-exempt surge arresters.⁷ Therefore, it is subject to the WMP vegetation clearance requirement under initiative 8.2.3.1 Pole Clearing, which mandates the removal of flammable vegetation within 10 feet around the base of such poles. The inspector's observation is documented in Exhibit A photographs, which are attached to this report. Photo 1 depicts pole ID P612225. Photos 2, 3, and 4 depict the stump within 10 feet of the pole. Photo 5 depicts one of the non-exempt surge arresters on the pole. Exhibit B includes CALFIRE's 2022 Powerline Equipment Identification Pocket Guide.

⁶ SDG&E "2023-2025 Base WMP", published July 25, 2025. P. 278

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59036&shareable=true> accessed February 18, 2026).

⁷ CALFIRE 2022, current edition available online, [California Powerline Equipment Identification Pocket Guide](#), p. 23, accessed March 3, 2026

Exhibits

Exhibit A: Photo Log

Structure ID: P612225

Deficiency 1



Photo 1: Pole ID P612225.



Photo 2: The eucalyptus stump within the 10-foot radius of the pole.



Photo 3: Measurement shows the eucalyptus stump is approximately five feet from the base of the pole.



Photo 4: Measurement shows the eucalyptus stump is approximately four feet in height.



Photo 5: Close-up image of non-exempt surge arrester on the pole.

Exhibit B: CALFIRE's 2022 Powerline Equipment Identification Pocket Guide



Powerline Equipment Identification Pocket Guide



In Accordance with
Public Resources
Codes 4292 & 4293



SOUTHERN CALIFORNIA
EDISON®

Surge Arrester

