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VIA ELECTRONIC FILING

Docket # 2025 NON

Sheryl Bilbrey
Program Manager, Environmental Science Division
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

**RE: San Diego Gas & Electric Company's Response to Notice of Non-Performance –
NON_ESD_SDGE_RGA_20260210_1149**

Dear Program Manager Bilbrey:

San Diego Gas & Electric Company (SDG&E) provides this response to the finding identified in the Notice of Non-Performance "NON_ESD_SDGE_RGA_20260210_1149" (Notice of Non-Performance or NON) issued by the Office of Energy Infrastructure Safety's (Energy Safety) on March 11, 2026 regarding Energy Safety's inspection of work completed by SDG&E in accordance with its 2025 Wildfire Mitigation Plan (WMP). Specifically, the NON describes that on February 10, 2026, Energy Safety conducted an inspection of SDG&E's WMP initiatives in the vicinity of the city of Ramona, California and 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 P249734, near coordinates 33.01475, -116.86707. 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.

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

¹ See Pub. Util. Code §8386.1.

I. SDG&E RESPONSE**A. Deficiency 1 – Pole Clearing, Failure Remove All Vegetation Down to Bare Mineral Soil Within A 10-Foot Radius of Pole ID P249734**

Please see attached pdf document titled, “NON_ESD_SDGE_RGA_20260210_1149_CAP”. SDG&E is providing the work order documenting the corrective action pole clearing at Pole ID P249734 which was completed on 3/11/26. SDG&E is also providing the before and after photos of the work. Please note in the post-work photo that the dead stumps were removed using a chainsaw as low to the ground as worker safety would allow.

II. CONCLUSION

SDG&E appreciates Energy Safety’s continued efforts to identify, communicate, and work together to promote wildfire safety throughout California.

Respectfully submitted,

/s/ Laura M. Fulton

Attorney for

San Diego Gas and Electric Company

Attachment:
NON_ESD_SDGE_RGA_20260210_1149_CAP

NON_ESD_SDGE_RGA_20260210_1149

P249734 – Before



P249734 – After



Vegetation Electronic Ticketing System (VETS) Request Form

Ticket #:

Work on private property?:

Is this an emergency?:

Customer notified?:

Charge Type:

Who was notified and how?:

CPD Selection:

Work Order Number:

Bundled Operation:

Project:

MCU:

Project Description:

CPD Notification:

Other Project:

FERC Account:

Sort Charge Info.:

Charge Number:

Customer Charge Info.:

Job Owner:

Task Tracking:

Job Owner #:

Joint Meet Owner:

Due By:

Joint Meet Contact #:

Due Date:

Joint Meet Date:

Joint Meet Needed?:

Joint Meet Time:

Veg Activity Type:

Transmission Project:

District:

Cost Center:

Work Type:

G/L Account:

Asset Type:

Order:

Request Type:

CMP Veg Vine on Pole

1B Notif Number:

Path to Pole Tree Trim / Removal

1B Description:

Treeguard Stump Grind

1B Req End Date:

Pole Brush Other

Path Type:

Workspace Clearance (Overhead / Underground)

Structure ID:

Job Code:

Address / Location:

Zip:

City:

Lat/Long

District:

HFTD

Environmental review info:

VMA

Monitor Required Date:

Monitor Required?:

Monitor Type:

- Air Resources Biological Land Use Paleontological
 Aquatic Cultural Native Storm

Submitter

Date Submitted

Work Description:

DUE by 3/13/26

VETS for Billing purposes only. **Work was completed on 3/11/26.** Job is approved for 2 hours.

P612226 (YY35993) VMA 393 - Trim 2 large Eucalyptus stumps down to a minimum of 4-inches above ground level.
P249734 (CF328) VMA 393 - Trim 3 large Eucalyptus stumps down to a minimum of 4-inches above ground level.

Veg Pre-Inspector Work Description:

Date/Time	User	Comment
03/13/2026 13:11:39	<input type="text" value=""/>	Work has been completed