



Laura M. Fulton  
 Senior Counsel  
 8330 Century Park Court, CP32F  
 San Diego, CA 92123-1548  
 LFulton@SDGE.com

September 26, 2023

**VIA ELECTRONIC FILING**

**Docket # 2021-SVM**

Caroline Thomas Jacobs  
 Director, Office of Energy Infrastructure Safety  
 715 P Street, 20th Floor  
 Sacramento, CA 95814

**Re: SDG&E 2021 SVM Audit Corrective Action Plan**

Dear Director Thomas Jacobs:

San Diego Gas & Electric (“SDG&E”) hereby provides this response, as well as supporting documentation, to the corrective actions listed in Table 4 of the Office of Energy Infrastructure Safety’s (“Energy Safety”) Audit on SDG&E’s 2021 Substantial Vegetation Management (“SVM”) Work (the “SVM Audit”) issued on September 12, 2023. The audit evaluated the vegetation management section of SDG&E’s 2021 Wildfire Mitigation Plan (“WMP”) Update to assess whether SDG&E performed the work specified by its quantitative commitments and executed its verifiable statements. Energy Safety found that SDG&E performed the work required for 19 of the 20 initiatives in the 2021 WMP but found that SDG&E did not complete the work related to one initiative (no. 7.3.5.20). Specifically, the SVM Audit concludes that SDG&E did not perform environmental reviews prior to pole brushing three newly installed poles.

Energy Safety directed SDG&E to undertake certain corrective actions associated with the one area in which SDG&E did not complete the required SVM work, as shown below.

<b>Initiative Number:</b>	7.3.5.20
<b>Finding:</b>	Failure to perform an environmental review in advance of new pole brushing activities.
<b>Corrective Action:</b>	SDG&E shall a) provide a reason why it failed to perform an environmental review for poles P519482, P618021, and P110791 prior to pole brushing; and b) detail the steps it is taking to ensure vegetation management operations are consistent with statements made in its WMP for this initiative.

**I. SDG&E's Response to the Findings and Recommended Corrective Action for Initiative 7.3.5.20: Vegetation Management to Achieve Clearances around Electric Lines and Equipment**

SDG&E first notes the SVM Audit's conclusion that "most" of the new poles reviewed had received an environmental review prior to pole brushing, and the findings are limited to three of the 35,000 total poles brushed and of the 68 new poles reviewed. SDG&E reviewed the supporting data provided to Energy Safety in response to OEIS-DR-164, Question 22, which detailed new pole brushing activities that received an environmental review in 2021. In that file, SDG&E reported three poles whose brush date in 2021 preceded the date of the environmental review that year. Upon further research, SDG&E determined two of the subject poles (P110791; P618021) had a previous brush date in 2020. For each of these poles the 2020 brushing activity occurred after the environmental review and release on May 8, 2020. Therefore, both poles had already been reviewed and released prior to the 2021 brushing activity.

These two poles were inadvertently included in the environmental release in May 2021 because the inventory records for each pole were updated to condition code, '*Environmental Hold*' in late 2020. These record updates were performed during the pole inspection activity and are determined to have been data entry errors. The status code change caused them to be included in the subsequent environmental review in 2021.

Similarly, P519482, the third pole in the SVM audit finding, also had a brushing activity prior to 2021. However, SDG&E could not locate record of where this pole was specifically called out in an environmental review prior to past brushing activity dates. This is partly due to a clerical error where the inventory record ID for P519482 was errantly assigned to adjacent subject pole P117353, located approximately 20 feet to the east (See Photo below). SDG&E's records reflect an environmental review for P117353 prior to 2021. Given the close physical proximity of these two poles, their relative work area, and the scope of environmental review, both poles can be considered as having been reviewed prior to 2021.

SDG&E notes that while the environmental review for new pole brushing activities is important for understanding the impacts to any applicable protected species and habitat, the SVM Audit findings were unrelated to wildfire risk reduction. SDG&E's vegetation management activities for 2021 achieved the targeted wildfire risk reduction.

**Physical location of audit pole P519482 and P117353.**



As corrective action, SDG&E Vegetation Management will focus on training and quality assurance/quality control for its staff and contractors to reduce clerical and data entry errors by determining whether each pole being entered into the annual maintenance program has been environmentally reviewed prior to its initial brushing activity.

**II. Conclusion**

SDG&E appreciates the significant effort that Energy Safety put into the assessment of the implementation and execution of our 2021 WMP vegetation management work, and requests that Energy Safety consider the discussion above when assessing SDG&E's completion of its WMP vegetation management initiatives.

Respectfully submitted,

/s/ Laura M. Fulton

Attorney for  
San Diego Gas and Electric Company