



December 13, 2023

To: San Diego Gas & Electric Company (SDG&E)  
Shaun P. Gahagan  
Wildfire Mitigation Program Manager

SUBJECT: Office of Energy Infrastructure Safety's Report on SDG&E's 2021 Substantial Vegetation Management Audit

Pursuant to the requirements of California Public Utilities Code section 8386.3(c)(5)(C), the Office of Energy Infrastructure Safety (Energy Safety) completed its final report on SDG&E's 2021 Substantial Vegetation Management (SVM) audit. Energy Safety finds that SDG&E substantially complied with the substantial portion of the vegetation management requirements in its 2021 Wildfire Mitigation Plan Update.

The attached report follows Energy Safety's publication of its SVM audit on September 12, 2023, and SDG&E's subsequent response on September 26, 2023. Pursuant to statutory requirements, a copy of this report is issued to SDG&E, published on Energy Safety's 2021 SVM Docket<sup>1</sup> and provided to the California Public Utilities Commission.

Sincerely,

A handwritten signature in black ink, appearing to read "Suzie Rose". The signature is fluid and cursive, with a long horizontal stroke at the end.

Suzie Rose  
Program Manager, Compliance Assurance Division  
Office of Energy Infrastructure Safety

Cc:  
Edward Chavez, Energy Safety  
Gary Candelas, Energy Safety  
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Leslie Palmer, CPUC  
Shewit T Woldegirogis, SDG&E  
Lena McMillin, SDG&E  
Laura Fulton, SDG&E

Attachment: SDG&E 2021 SVM Audit Report

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<sup>1</sup> All documents related to SDG&E's 2021 SVM audit are available on Energy Safety's e-filing system under the "[2021-SVM](#)" docket number (accessed December 12, 2023).



**OFFICE OF ENERGY INFRASTRUCTURE SAFETY**

**2021 SUBSTANTIAL VEGETATION  
MANAGEMENT AUDIT REPORT**

**SAN DIEGO GAS & ELECTRIC COMPANY**

December 2023

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## 1. Background

Pursuant to Public Utilities Code section 8386.3(c)(5), the Office of Energy Infrastructure Safety (Energy Safety) must audit the vegetation management work performed by, or on behalf of, the electrical corporation. The audit shall specify any failure of the electrical corporation to fully comply with the vegetation management requirements in the Wildfire Mitigation Plan (WMP).<sup>1</sup> Energy Safety then provides the audit to the electrical corporation and grants it a reasonable time to correct and eliminate any deficiency specified in the audit.<sup>2</sup> Following receipt and review of the electrical corporation's Corrective Action Plan, Energy Safety issues an audit report to the electrical corporation identifying whether the electrical corporation substantially complied with the substantial portion of the vegetation management requirements in the applicable year.<sup>3</sup> This document is Energy Safety's Report on the 2021 Substantial Vegetation Management (SVM) Audit of San Diego Gas & Electric Company (SDG&E).

To conduct the 2021 SVM Audit, Energy Safety identified both quantitative commitments (e.g., miles of lines to inspect) and verifiable statements (e.g., training of personnel) in the vegetation management section of SDG&E's 2021 WMP Update and conducted an audit to determine if SDG&E performed the work required by each of those commitments and statements.

Energy Safety reviewed all 20 initiatives pertaining to vegetation management in SDG&E's 2021 WMP Update. Energy Safety's audit found that SDG&E did not perform all the work specified in one out of the 20 vegetation management initiatives in its 2021 WMP Update. For this initiative, Energy Safety's audit found that SDG&E was unable to provide supporting documentation or information consistent with statements made in its 2021 WMP Update regarding its vegetation management initiatives. The other 19 initiatives were completed sufficiently.

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<sup>1</sup> Pub. Util. Code, § 8386.3(c)(5)(A).

<sup>2</sup> Pub. Util. Code, § 8386.3(c)(5)(A).

<sup>3</sup> 2023 Compliance Guidelines, Section 6.1, 14. Pub. Util. Code, § 8386.3(c)(5)(C), <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55586&shareable=true> (accessed October 31, 2023).

On September 12, 2022, Energy Safety provided its 2021 SVM Audit of SDG&E’s work<sup>4</sup> that identified where SDG&E did not perform all the vegetation management work required by its WMP, specified a corrective action pertaining to the audit and required SDG&E to provide a Corrective Action Plan. On September 26, 2023, SDG&E timely provided its Corrective Action Plan and included supporting documentation.<sup>5</sup>

## 2. 2021 SVM Audit Findings

Table 1 below summarizes Energy Safety’s findings from its 2021 SDG&E SVM Audit.

Table 1. Findings from Energy Safety’s 2021 SVM Audit of SDG&E

Initiative Number and Name	Finding	Corrective Action
7.3.5.20 Vegetation Management to Achieve Clearance Around Electric Lines and Equipment	1. Failure to perform an environmental review in advance of new pole brushing activities.	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.

<sup>4</sup> Published on Energy Safety’s e-filing system in the 2021 WMP Substantial Vegetation Management Audits docket, <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55592&shareable=true>, (accessed on October 31, 2023).

<sup>5</sup> SDG&E’s SVM Audit Corrective Action Plan is published on Energy Safety’s e-filing system in the 2021 WMP Substantial Vegetation Management Audits docket and available here, <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55646&shareable=true>, (accessed on October 31, 2023).

## 3. Analysis of Corrective Action Plan

### 3.1 Initiative 7.3.5.20

SDG&E's 2021 WMP Update states that under Initiative 7.3.5.20 (Vegetation Management to Achieve Clearance Around Electric Lines and Equipment), "SDG&E performs an environmental review in advance of all new pole brushing activities to assess impacts to protected species and habitat."<sup>6</sup> However, the information that SDG&E provided regarding work on Initiative 7.3.5.20 indicated that SDG&E did not perform an environmental review at three out of the total 68 poles that it performed pole brushing activities on in 2021.<sup>7</sup>

Energy Safety's SVM Audit provided the following corrective action:

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.<sup>8</sup>

In its Corrective Action Plan, SDG&E states that:

1. For each of the three poles in question (P110791, P618021, and P519482), SDG&E did in fact perform an environmental review in advance of pole brushing activities, and the information SDG&E originally provided to Energy Safety was in error.
  - a. The error regarding two of the three poles (P110791 and P618021) occurred because, sometime before 2021, SDG&E inspectors incorrectly changed the pole condition codes to "Environmental Hold."<sup>9</sup> That condition code caused SDG&E to incorrectly indicate to Energy Safety that the environmental reviews had not been performed.<sup>10</sup>
  - b. The error regarding the third pole (P519482) occurred when SDG&E incorrectly assigned the identification inventory record for that pole to a different pole (P117353) which is located 20 feet away. "Given the close physical proximity of these two poles, their relative work area, and the scope of the environmental review, both poles can be considered as having been reviewed prior to 2021."<sup>11</sup>

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<sup>6</sup> 2021 WMP Update, page 286.

<sup>7</sup> Response to DR-164, question 22; attachment "DR-164\_Q22.xlsx."

<sup>8</sup> SDG&E's SVM Audit is published on Energy Safety's e-filing system in the 2021 WMP Substantial Vegetation Management Audits docket and available here, <https://efiling.energy-safety.ca.gov/eFiling/Getfile.aspx?fileid=55592&shareable=true>, (accessed on October 31, 2023).

<sup>9</sup> SDG&E 2021 SVM Corrective Action Plan, page 2.

<sup>10</sup> SDG&E 2021 SVM Corrective Action Plan, page 2.

<sup>11</sup> SDG&E 2021 SVM Corrective Action Plan, page 3.

For pole P519482, SDG&E submitted a photograph showing that both poles were near one another. Energy Safety accepts SDG&E’s explanation that, because the poles are close to one another, an environmental review for one pole would capture the other pole. Energy Safety also accepts SDG&E’s explanation regarding the data error for poles P110791 and P618021. Therefore, Energy Safety finds that SDG&E performed an environmental review in advance of pole brushing activities for each of the three poles in question.

SDG&E’s Corrective Action Plan states that to address these errors, SDG&E’s “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.”<sup>12</sup>

Energy Safety finds SDG&E’s Corrective Active Plan for addressing its data errors sufficient. Therefore, Energy Safety finds SDG&E’s Corrective Action Plan for Initiative 7.3.5.20 sufficient.

## 4. Summary of Determinations

Table 2 summarizes Energy Safety’s determination regarding the sufficiency of each of SDG&E’s Corrective Action Plan responses.

Table 2: Summary of Energy Safety’s Analysis of SDG&E’s Response and Corrective Action

Initiative Number	Corrective Action Plan Response Determination
7.3.5.20	Sufficient

## 5. Substantial Compliance with the Substantial Portion of Vegetation Management Requirements

Substantial compliance with the substantial portion of vegetation management requirements means that:

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<sup>12</sup> SDG&E 2021 SVM Corrective Action Plan, page 3.

- 1) The electrical corporation's deficiencies, after considering its planned corrective actions, have not detracted from the electrical corporation's ability to achieve the objectives of its vegetation management programs;
- 2) The electrical corporation's effort to fulfill the vegetation management requirement constituted a good faith effort to comply with the vegetation management requirements in the approved WMP; and
- 3) The electrical corporation completed the large majority of the vegetation management requirements in its approved WMP.<sup>13</sup>

SDG&E's performance under each of these criteria is discussed in further detail below.

1. Energy Safety's 2021 SVM audit found that SDG&E performed the work required for 19 of the 20 vegetation management initiatives in its 2021 WMP Update.<sup>14</sup> Although information initially provided by SDG&E indicated that it had not performed the work required for one of the vegetation management initiatives in its 2021 WMP Update, the information SDG&E provided in its Corrective Action Plan demonstrates that it did perform the work required for this initiative, and that the initial reporting was in error. Therefore, SDG&E performed the work required for all of the vegetation management initiatives in its WMP. SDG&E's only deficiencies were the reporting errors discussed in Section 3 above. SDG&E has provided an acceptable corrective action for these reporting errors. The purpose of SDG&E's vegetation management program is to mitigate ignition risk associated with contact from objects and to mitigate wildfire consequence risk.<sup>15</sup> SDG&E's one deficiency was a reporting error that did not prevent it from performing all the work required by its vegetation management initiatives. Therefore, Energy Safety finds this deficiency did not detract from SDG&E's ability to achieve the objectives of its vegetation management programs.
2. SDG&E performed the work required for all of the vegetation management initiatives in its 2021 WMP Update. This constitutes a good faith effort to comply with the requirements in its approved WMP.

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<sup>13</sup> 2023 Compliance Guidelines, Section 6.1, 15. Pub. Util. Code, § 8386.3(c)(5)(C), <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55586&shareable=true>, (accessed October 23, 2023).

<sup>14</sup> SDG&E SVM Audit, page 5.

<sup>15</sup> 2021 WMP Update, pages 169-170.

3. SDG&E completed all of the vegetation management requirements in its approved WMP.

## **6. Conclusion**

Energy Safety finds that SDG&E substantially complied with the substantial portion of the vegetation management requirements in its 2021 WMP Update.

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