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VIA ELECTRONIC FILING

OEIS Docket # 2023-SVM

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

RE: San Diego Gas & Electric's (SDG&E) Notification of Completion of Substantial Vegetation Management in accordance with California Public Utilities Code Section 8386.3.(c)(5)(A)

Dear Director Thomas Jacobs:

In accordance with California Public Utilities Code Section 8386.3(c)(5)(A), SDG&E is providing notification to the Office of Energy Infrastructure Safety that San Diego Gas & Electric (SDG&E) has completed a substantial portion of its 2023 Wildfire Mitigation Plan (WMP) vegetation management initiatives. SDG&E provides the following activities to represent its completion of a substantial portion of its 2023 WMP Vegetation Management Initiatives as of December 1, 2023.

SDG&E's Detailed Inspections activity (SDG&E WMP 8.2.2.1) is the annual inspection of all inventory trees within the service territory. SDG&E's 2023 target for this initiative is 485,400 trees, and thus far, SDG&E has completed inspections on approximately 457,800 trees. SDG&E expects to reach, or exceed, the target by year's end since the inventory tree population fluctuates daily and changes over time as a result of trees removed in the landscape and added to the inventory.

SDG&E's Off-Cycle Patrol (SDG&E WMP initiative 8.2.2.2) is the second annual preinspection activity for all trees located within the utility strike-zone of the HFTD. SDG&E's target for this initiative is to complete an off-cycle patrol in all 106 Vegetation Management Areas (VMA) of its service territory that are wholly or partially within the HFTD. SDG&E has completed its annual target of 106 VMAs.

SDG&E's Fuels Management Program (SDG&E WMP initiative 8.2.3) consists of the thinning of vegetative fuels around structures subject to pole brushing within a radius greater than required by law in the high fire threat areas. SDG&E's 2023 target for this initiative is 500 poles, and thus far, SDG&E has completed 404 poles. SDG&E expects to reach the 2023 target by year's end.

SDG&E's Pole Clearing (Brushing) (SDG&E WMP Initiative 8.2.3.1) is the removal of vegetation surrounding poles subject to Public Resources Code 4292. SDG&E's target for this initiative is 33,010 poles, and thus far, SDG&E has completed clearing on 26,466 poles.

Furthermore, SDG&E determined that approximately 4,841 of the targeted poles do not require clearing. Overall, SDGE is approximately 95% complete with its pole clearing activities and expects to reach the target by year's end.

SDG&E's Enhanced Trim/Removals activity (SDG&E WMP initiative 8.2.3.3) includes the application of enhanced time-of-trim clearances on targeted species and the removal of trees located within the HFTD. SDG&E's 2023 target for this initiative is 11,200 trees and, thus far, SDG&E has completed 11,576 units under this initiative. Enhanced clearances are not arbitrary or predetermined, and not performed on all targeted tree species. Rather, those trees that cannot be maintained with routine clearance, and/or present a potential threat to the conductors by branch-break are candidates for enhanced clearance. The determination and application of enhanced clearances is made during the tree trimming activity. Post-trim clearances are not prescribed during the pre-inspection activity, however, the determination of whether a tree requires removal or substantial crown reduction due to growth rate or defect is made by the pre-inspector.

Respectfully submitted,

/s/ Laura M. Fulton

Attorney for San Diego Gas and Electric Company