



April 3, 2024

Mr. Shaun Gahagan  
Wildfire Mitigation Program Manager  
San Diego Gas & Electric Company  
8326 Century Park Court, CP32F  
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## NOTICE OF VIOLATION

Mr. Shaun Gahagan:

Pursuant to Public Utilities Code section 326 and Government Code section 15475.1, the Office of Energy Infrastructure Safety (Energy Safety) has conducted an inspection of work completed by San Diego Gas & Electric Company (SDG&E) in accordance with its 2022 Wildfire Mitigation Plan (WMP) and determined the existence of one or more violations. Energy Safety therefore issues SDG&E a Notice of Violation (NOV), identifying noncompliance with an approved WMP or any law, regulation, or guideline within the authority of the Office.<sup>1</sup>

On April 27, 2023, Energy Safety conducted an inspection of SDG&E's WMP initiatives in the vicinity of the city of Alpine, California. The inspection report is enclosed herewith. Energy Safety found the following violation:

Violation 1. Energy Safety observed that in implementing 2022 WMP initiative 7.3.3.3 - Covered Conductor Installation, SDG&E failed to install covered conductor on pole ID P574883 at coordinates 32.8093471616653, -116.65015668652. Energy Safety considers this violation for failure to complete initiative to be in the Minor risk category.

### Response Options

Energy Safety may prescribe a timeframe for resolution of a violation associated with the assigned risk category.<sup>2</sup> Within 30 days from the issuance date of this NOV, the electrical corporation must provide a response advising Energy Safety of corrective actions taken or planned to remedy the above identified violation(s) and prevent recurrence. Alternatively, the electrical corporation must advise Energy Safety that it will not correct the violation, including the reasoning or justification for inaction and all supporting documentation.<sup>3</sup>

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<sup>1</sup> Cal. Code Regs., tit. 14, section 29302(b)(2)

<sup>2</sup> Energy Safety Compliance Guidelines, pp. 5-6

<sup>3</sup> Energy Safety Compliance Guidelines, pp. 6-7

This response shall be filed in the Energy Safety e-Filing system under the 2022 NOV Docket<sup>4</sup> and the associated file name(s) must begin with the NOV identification number provided above.

Pursuant to Government Code section 15475.4, if the electrical corporation intends to request a hearing “to take public comment or present additional information,” it must also do so within the 30-day timeframe. If a petition for hearing is not received by the deadline, then the determination and conditions set forth in this NOV become final.

Prior to its response or request for hearing, the electrical corporation may also request an informal conference with Energy Safety’s Compliance Assurance Division for the purpose of disputing any issues raised in this NOV no later than five (5) business days before the response deadline.<sup>5</sup> Requests for informal conference with Energy Safety must be e-mailed to [compliance@energysafety.ca.gov](mailto:compliance@energysafety.ca.gov), with a copy sent to all Energy Safety Compliance Assurance Division staff identified in the NOV.

Pursuant to Public Utilities Code section 8389(g), following receipt of the electrical corporation’s response to this NOV and resolution of any disputes, this matter may be referred to the California Public Utilities Commission for its consideration of potential enforcement action, as it deems appropriate.

Sincerely,



Patrick Doherty  
Program Manager | Compliance Assurance Division  
Office of Energy Infrastructure Safety  
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<sup>4</sup> <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2022-NOV>

<sup>5</sup> Energy Safety Compliance Guidelines, p. 6

Edward Chavez, Energy Safety

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# INSPECTION REPORT

## Overview

### Inspection Categories

The Office of Energy Infrastructure Safety (Energy Safety) conducts inspections to verify the work performed by an electrical corporation as reported in an approved Wildfire Mitigation Plan (WMP) or subsequent filing, and to assess general conditions of electrical infrastructure that may adversely impact an electrical corporation's wildfire risk.

A Notice of Violation (NOV) is issued for any instances of noncompliance discovered during an inspection related to an electrical corporation's execution of its WMP initiatives.

### Correction Timelines

Violations must be corrected in a timely manner. Energy Safety may prescribe a timeframe for resolution of a violation. If Energy Safety assigns a risk category to a violation, an electrical corporation must correct the violation as required per the timelines provided in Table 1.<sup>6</sup>

**Table 1. Risk Category and Correction Timelines**

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

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<sup>6</sup> Energy Safety Compliance Guidelines, p. 5



# Inspection Summary

Table 2 provides a summary of the selection of the WMP inspection location and initiative. Table 3 provides a summary of the violation(s) found during the inspection. Details regarding the inspection that identified the violation(s) are provided in the Inspections Details Section below.

***Table 2: Inspection Location and Initiative Summary***

Electrical Corporation:	San Diego Gas & Electric Company (SDG&E)
Report Number:	SDGE_CAC12_20230427_0742
Inspector:	CAC12
WMP Year Inspected:	2022
Quarterly Data Report (QDR) Referenced:	Quarters 3 and 4 (Q3 & Q4)
Inspection Selection:	Energy Safety viewed the contents of the Q3 and Q4 QDR and performed an analysis that resulted in the selection of the WMP initiatives and locations referenced in this report.
Relevant WMP Initiative(s):	Covered Conductor Installation (2022 WMP initiative number 7.3.3.3)
Date of inspection:	April 27, 2023
City and/or County of Inspection:	Alpine, San Diego County
Inspection Purpose:	Assess the accuracy of SDG&E’s QDR data, completeness of its work, compliance with WMP requirements, and compliance with its protocols.

***Table 3: WMP Inspection Violation***

<b>Violation #</b>	<b>Structure ID</b>	<b>Lat/Long</b>	<b>HFTD</b>	<b>Initiative Number</b>	<b>Violation Type</b>	<b>Severity</b>	<b>Violation Description</b>
Violation 1	P574883	32.8093471616653, -116.65015668652	Tier 3	7.3.3.3	Completeness	Minor	Failure to install covered conductor

# Inspection Details

## Violation 1:

### Relevant Requirement:

SDG&E's 2022 WMP states the following regarding initiative number 7.3.3.3 – Covered Conductor installation:

1. "The Covered Conductor Program met its targets for 2021 and has set a target of 60 miles for 2022."<sup>7</sup>

### Finding:

Energy Safety arrived at the provided pole ID P574883 at 23301-23567 Bell Bluff Truck Trail, Alpine, CA 91901, 32.8093471616653, -116.65015668652 and found bare wire. No covered conductor was observed where covered conductor installation was reported as completed by SDG&E. The inspector's observation is documented in Violation 1 photographs, which are attachments to this report. Photo numbers Item1GIimg1, Item1GIimg2 and Item1IA1img1 depict bare conductor where covered conductor installation was reported as completed.

Energy Safety concludes that Violation 1 is Minor because of these facts:

1. SDG&E reported that WMP initiative number 7.3.3.3 – Covered Conductor installation as completed at this location.
2. Bare wire was observed at the provided location.
3. No covered conductor was not observed at the provided location.

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<sup>7</sup> SDG&E, "2020-2022 Wildfire Mitigation Plan Update," Feb. 11, 2022. p. 215. [Online].

Available: <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>

# Exhibits

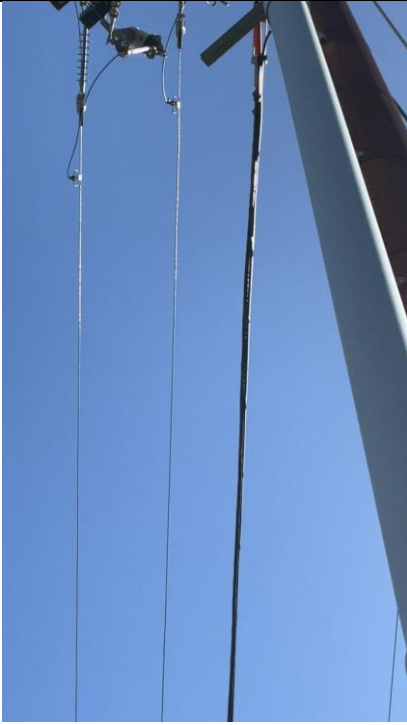
Exhibit A: Photo Log

Structure ID: P574883

Violation 1

	
<p>Item1Gimg1: Overall pole.</p>	<p>Item1Gimg2: Pole ID.</p>





**Item1IA1img1:** View of bare conductor where covered conductor installation was reported as completed.