



April 4, 2024

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.¹

On April 26, 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 violations:

Violation 1. Energy Safety observed that in implementing 2022 WMP initiative 7.3.3.18.3 – Avian Mitigation, SDG&E failed to install wildlife covers on transformer bushings on pole ID P275822 at coordinates 32.7908779085166, -116.67731479497. Energy Safety considers this violation for failure to adhere to protocol to be in the Minor risk category.

Violation 2. Energy Safety observed that in implementing 2022 WMP initiative 7.3.3.3 – Covered Conductor, SDG&E failed to install covered conductor on pole ID JP33462 at coordinates 32.7647823656679, -116.679371731863. Energy Safety considers this violation for failure to complete an initiative to be in the Minor risk category.

¹ Cal. Code Regs., tit. 14, section 29302(b)(2)

Response Options

Energy Safety may prescribe a timeframe for resolution of a violation associated with the assigned risk category.² 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.³

This response shall be filed in the Energy Safety e-Filing system under the 2022 NOV Docket⁴ 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.⁵ Requests for informal conference with Energy Safety must be e-mailed to 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
Patrick.Doherty@energysafety.ca.gov

Cc:

Jonathan Woldemariam

² Energy Safety Compliance Guidelines, pp. 5-6

³ Energy Safety Compliance Guidelines, pp. 6-7

⁴ <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2022-NOV>

⁵ Energy Safety Compliance Guidelines, p. 6

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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 1.⁶

Table 1. Risk Category and Correction Timelines

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

⁶ 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:	SDG&E_CAC12_20230426_0847
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):	Avian Mitigation (2022 WMP initiative number 7.3.3.18.3), Covered Conductor installation (2022 WMP initiative number 7.3.3.3)
Date of inspection:	April 26, 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(s)

Violation #	Structure ID	Lat/Long	HFTD	Initiative Number	Violation Type	Severity	Violation Description
Violation 1	P275822	32.7908779085166, -116.67731479497	Tier 3	7.3.3.18.3	Adherence to Protocol	Minor	Failure to install wildlife cover on transformer bushing
Violation 2	JP33462	32.7647823656679, -116.679371731863	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 7.3.3.18.3 - Avian Mitigation on poles:

1. "SDG&E's Avian Protection Program involves installing avian protection equipment on distribution poles in the service territory to prevent electrocution of birds and to facilitate compliance with Federal and State Laws [7]. The project is aimed at reducing the risk of faults and wire-down events associated with avian contact that can lead to ignitions and improve reliability."⁸

Finding:

On pole ID P275822 at 22137 Japatul Rd, Alpine, CA, 91901, USA, 32.7908779085166, -116.67731479497, the inspector observed that a pole-mounted transformer did not have transformer bushing covers. The inspector's observation is documented in Violation 1 photographs, which are attached to this report. Photo numbers Item6GImg1, Item6GImg2, and Item6IA2Img1 depict transformer bushings with no covers installed.

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

1. SDG&E reported WMP initiative number 7.3.3.18.3 - Avian Mitigation was completed at this location.
2. No transformer bushings are installed.

Violation 2:

Relevant Requirement:

SDG&E's 2022 WMP states the following regarding initiative number 7.3.3 – Covered Conductor on poles:

1. "The Covered Conductor Program met its targets for 2021 and has set a target of 60 miles for 2022."⁹

Finding:

Energy Safety arrived at the provided pole ID JP33462 at Alpine Union Elementary on Japatul Rd, Alpine, CA, 91901, USA, 32.7647823656679, -116.679371731863 and found bare wire. No covered conductor was

⁷ Migratory Bird Treaty Act (16 U.S.C. §§ 703-712), Bald and Golden Eagle Protection Act (16 U.S.C. §§ 668-668d), and California Fish and Game Code (Cal. Fish and Game Code §§ 3503, 3503.5, 3511, 3513)

⁸ SDG&E, "2020-2022 Wildfire Mitigation Plan Update," Feb. 11, 2022. p. 243. [Online]. Available: <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033&shareable=true>

⁹ 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>

observed where covered conductor installation was reported as completed by SDG&E. The inspector's observation is documented in Violation 2 photographs, which are attached to this report. Photo numbers Item16GIimg1, Item16GIimg2, and Item16IA1img1 depict bare conductor where covered conductor installation was reported as completed.

Energy Safety concludes that Violation 2 is Minor because of these facts:

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

Exhibits

Exhibit A: Photo Log

Structure ID: P275822

Violation 1



Item6G1mg1: Overall pole.



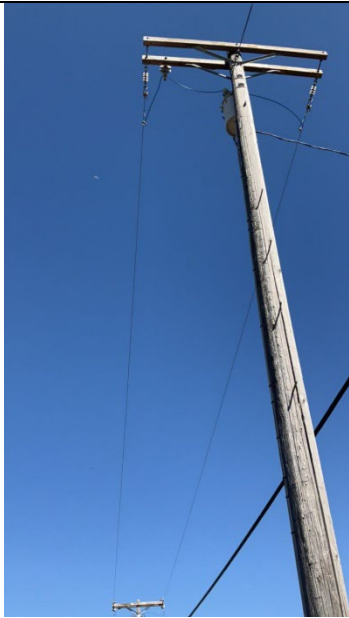
Item6G1mg2: Pole ID.



Item6IA21mg1: View of primary transformer bushings without wildlife covers.

Structure ID: JP33462

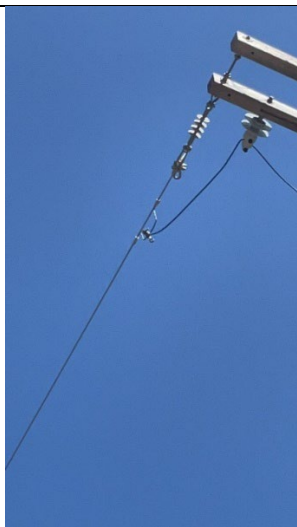
Violation 2



Item16GImg1: Overall pole.



Item16GImg2: Pole ID.



Item16IA1img1: View of bare overhead conductor where covered conductor installation was reported as completed.