



April 26, 2024

Shaun Gahagan
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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 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 August 10, 2023, Energy Safety conducted an inspection of SDG&E's WMP initiatives in the vicinity of the city of Valley Center, California. The inspection report is enclosed herewith. Energy Safety found the following violation:

Violation 1. Energy Safety observed that in implementing 2023 WMP initiative 8.1.2.2 Undergrounding of Electric Lines and/or Equipment (WMP.473), SDG&E failed to complete undergrounding work near structure ID 344498 at coordinates 33.1990155926313, -116.940528089193. Energy Safety considers this violation for failure of completeness 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.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

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

² Energy Safety Compliance Guidelines, pp. 5-6

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 2023 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,



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³ Energy Safety Compliance Guidelines, pp. 6-7

⁴ <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2023%20NOV>

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:	SDGE_CAC12_20230810_0821
Inspector:	CAC12
WMP Year Inspected:	2023
Quarterly Data Report (QDR) Referenced:	Quarter 1 (Q1)
Inspection Selection:	Energy Safety viewed the contents of the Q1 QDR and performed an analysis that resulted in the selection of the WMP initiatives and locations referenced in this report.
Relevant WMP Initiative(s):	Undergrounding of Electric Lines and/or Equipment – Distribution (2023 WMP initiative number 8.1.2.2)
Date of inspection:	August 10, 2023
City and/or County of Inspection:	Valley Center, 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	Near 344498	33.1990155926313, -116.940528089193	Tier 3	8.1.2.2 - Undergrounding of Electric Lines and/or Equipment	Completeness	Minor	Failure to perform undergrounding work

Inspection Details

Violation 1:

Relevant Requirement:

SDG&E's 2023 WMP states the following regarding initiative number 8.1.2.2 Undergrounding of Electric Lines and/or Equipment (WMP.473):

1. "The Strategic Undergrounding Program (WMP.473) is a program that converts overhead systems to underground, providing the dual benefits of significantly reducing wildfire risk and the need for [Public Safety Power Shutoff] events in these areas."⁷ SDG&E's 2023 target was to underground 84 miles.⁸

Finding:

Near structure 344498 at 18915 Littlefield Ln, Valley Center, CA 92082, USA, 33.1990155926313, -116.940528089193, Energy Safety inspectors were unable to locate undergrounding work that was reported as completed at this location. The inspector's observation is documented in Violation 1 photographs, which are attachments to this report. Photo numbers Item8GIimg1 and Item8IA1img1 depict an overall view of the area where undergrounding work was identified as complete. The inspector did not observe undergrounding work.

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

1. SDG&E's WMP 8.1.2.2 - Undergrounding of Electric Lines and/or Equipment work was identified as complete at this location.
2. Energy Safety observed no indication of undergrounding work at or near the provided location.

⁷ San Diego Gas & Electric Company, "2023-2025 WILDFIRE MITIGATION PLAN UPDATE," Mar. 27, 2023. p. 153. [Online]. Available: <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53487&shareable=true>



⁸ San Diego Gas & Electric Company, "2023-2025 WILDFIRE MITIGATION PLAN UPDATE," Mar. 27, 2023. p. 143. [Online]. Available: <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53487&shareable=true>

Exhibits

Exhibit A: Photo Log

Structure ID: N/A, near structure 344498

Violation 1

	
<p>Item8GImg1: Overall view of the area of the reported location of undergrounding work showing no indication of undergrounding work performed.</p>	<p>Item8IA1Img1: Secondary overall view of the area of the reported location of undergrounding work showing no indication of undergrounding work performed.</p>