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VIA ELECTRONIC FILING

Docket # 2023 NOV

Patrick Doherty
Program Manager, Compliance Assurance Division
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

**RE: San Diego Gas & Electric Company's Response to Notice of Violation –
NOV_SDGE_CAC12_20230810_0821**

Dear Program Manager Doherty:

San Diego Gas & Electric Company (SDG&E) provides this response to the finding(s) identified in the "NOV_SDGE_CAC12_20230810_0821" (Notice of Violation or NOV) issued by the Office of Energy Infrastructure Safety's (Energy Safety) on April 26, 2024, regarding Energy Safety's inspection of work completed by SDG&E in accordance with its 2023 Wildfire Mitigation Plan (WMP). Specifically, the NOV describes that 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 and 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.

SDG&E is not requesting a written hearing for the finding addressed in this response; however, SDG&E reserves the right to raise these points in subsequent procedural stages and/or proceedings as necessary. Further, although Energy Safety has the right to refer certain notices to the California Public Utilities Commission for enforcement action, the findings in this notice do not merit referral, as there is inadequate support for a finding that SDG&E has failed to substantially comply with its approved WMP.¹

¹ See Pub. Util. Code §8386.1.

I. SDG&E RESPONSE

SDG&E has reviewed the data provided in the Q1 2023 QDR where SDG&E reported completed undergrounding work at this location. SDG&E did complete a small amount of undergrounding at this location which included a new undergrounded secondary voltage line associated with a new underground service replacing the existing overhead service.

SDG&E notes that Energy Safety was unable to find evidence of this undergrounding work because no new above ground equipment was installed with this work. The new service went straight to the customer location. This is different from primary distribution lines that are undergrounded where there will be relatively frequent handholes and associated pad mounted equipment such as transformers, switches, and fuses which can be easily identified and inspected to verify the completion of the work. A screenshot of the location is included below which identifies the small portion of completed work in yellow and provides additional information which is included in SDG&E’s QDR submissions to identify this work as secondary distribution lines associated with a new underground service.

SDG&E confirms that this work was completed as reported and requests the closure of the NOV. SDG&E will continue to work with Energy Safety to provide information which will assist with the inspections of SDG&E’s completed WMP initiatives.

OBJECTID	Shape	GH ID	Asset OH or UG	Line Class	WMP Page Number	Description of Work	GH Status
1	Polyline	Completed-ESH C1030 4 SUG-1-681	Underground	Secondary Distributio...	153	New Service Underground	Complete
2	Polyline	Not Started-ESH C1030 4 SUG-1267	Overhead	Primary Distribution Li...	153	Primary Overhead Removal	Planned
3	Polyline	Not Started-ESH C1030 4 SUG-1268	Overhead	Primary Distribution Li...	153	Primary Overhead Removal	Planned
4	Polyline	Not Started-ESH C1030 4 SUG-1431	Overhead	Secondary Distributio...	153	Service Overhead Removal	Planned

OBJECTID	Shape	GH ID	Asset OH or UG	Utility ID	Utility Initiative Tracki...	Asset ID	Asset Feature	Segment ID	Circuit ID
2	Point	SH2534081-ESH C1030 4 SUG-1-46	Underground	SDG&E	WMP.473	(BD5E8C94-FDF7-485F-...	Support Structure	<Null>	<Null>

II. CONCLUSION

SDG&E appreciates Energy Safety's continued efforts to identify, communicate, and work together to promote wildfire safety throughout California.

Respectfully submitted,

/s/ Laura M. Fulton

Attorney for

San Diego Gas and Electric Company