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VIA ELECTRONIC FILING

Docket # 2022 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_20230427_0742**

Dear Program Manager Doherty:

San Diego Gas & Electric Company (SDG&E) provides this response to the finding(s) identified in the "Notice of Violation SDGE_CAC12_20230427_0742" (Notice of Violation or NOV) issued by the Office of Energy Infrastructure Safety's (Energy Safety) on April 3, 2024, regarding Energy Safety's inspection of work completed by SDG&E in accordance with its 2022 Wildfire Mitigation Plan (WMP). Specifically, the NOV describes that on April 27, 2023, Energy Safety conducted an inspection of SDG&E's WMP initiatives in the vicinity of the city of Alpine, California and 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.

As further explained herein, SDG&E is providing additional information to reflect that the violation observed by Energy Safety is the result of a data error in its fourth quarter Quarterly Data Report (QDR) spatial data. While the data demonstrated that SDG&E installed covered conductor in the area, SDG&E had not implemented covered conductor in the site of Energy Safety's April 27, 2023 inspection. SDG&E apologizes for the confusion resulting from the data error. It has corrected the data issue in subsequent reporting. SDG&E is resubmitting its Q4 2022 QDR with the correct data.

Because the perceived violation is the result of the data, and not the work performed, it is not necessary for SDG&E to take additional action at this time. SDG&E's covered conductor

installation for 2022 was completed in compliance with its Wildfire Mitigation Plan targets as evidenced by its data submissions.

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

I. SDG&E RESPONSE

It is not necessary for SDG&E to correct the violation identified as Violation 1 within NOV_SDGE_CAC12_20230427_0742 because SDG&E has discovered an error within the Q4 2022 QDR spatial data that resulted in this violation. The data provided for covered conductor installation was provided as both point data and line data within the 2022 Q4 QDR. The point data included within the QDR submission was the correct data that included all completed covered conductor installations. At the time of the 2022 Q4 QDR submission, SDG&E was beginning to transition reporting covered conductor, strategic undergrounding, and other grid hardening programs that utilized circuit miles for their reported units from point data to line data. The point data provided within the Q4 QDR submission did not report any completed work on these structures. The line data, however, erroneously reported completed covered conductor work on Circuit 448, but was attached to the incorrect span on C73, which was not part of any completed work. The preliminary line data for covered conductor was inadvertently included in the 2022 Q4 QDR submission and resulted in the appearance of covered conductor installation where it had not occurred.

SDG&E's completed covered conductor work within 2022 of 61.2 miles did not utilize the incorrect line data to calculate completed mileage. Therefore, all of SDG&E's covered conductor work in 2022 was reported accurately.

SDG&E found that certain spans were provided in error within the 2022 Q4 QDR submission. The 2022 Q4 QDR will be re-submitted without the incorrect line data by Friday, May 10, correcting the data violation identified.

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

¹ See Pub. Util. Code §8386.1.