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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_20230426_0847**

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_20230426_0847" (Notice of Violation or NOV) issued by the Office of Energy Infrastructure Safety's (Energy Safety) on April 4, 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 26, 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 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.

As further explained herein, SDG&E is providing additional information to reflect that the Violation 2 observed by Energy Safety is the result of a data error in its fourth quarter Quarterly Data Report 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 26, 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 2 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

A. Violation 1 – Avian Mitigation, SDG&E Failed to Install Wildlife Covers on Transformer Bushings

SDG&E has corrected the violation identified as Violation 1 within NOV_SDGE_CAC12_20230426_0847. On Tuesday, April 16th, 2024 SDG&E created a work order to inspect and correct the avian mitigation work performed on P275822. On April 18th, a crew completed repairs to install the bushing covers on the transformer identified within the NOV. Screenshots of SDG&E's completed work order for this job are included below. The first screenshot identifies the work order and completion date. The second screenshot shows the detailed notes from the work identifying the work performed and the date completed.

Selected	Notif.type	Notification	Description	Req. start	Required End/Ref. date	Functional Location	Description of FLOC	Equipment	TechID	Syststatus	User status	Coding	Coding code text	Item text	Damage	Condition Code Text (Damage Text)
1B	10002587014	P275822	Non Compliant OEIS	04/22/2024	04/18/2024	ED.MTE.DESCL1129.P111	ED-POLESEG:P27582	600601812	P27582	NOCC	COMP	127	MISC OHVI FOLLOW-UP	100025873614	1258	Avian Protection Damaged
1B	10002587361	1258	Avian Protection Damaged	04/18/2024	10/31/2024	04/18/2024	ED.MTE.DESCL1129.P111	ED-POLESEG:P27582	600601812	P27582	NOCC	COMP	120	TIER 3/QC FOLLOW-UP		

¹ See Pub. Util. Code §8386.1.

Notification	100025873614	1B	I258 Avian Protection Damaged
Notific. Status	NOCO		COMP
Notification Hdr Location			
Reference object			
Functional loc.	ED.MTE.DESC.L129.	ED:POLESEG:P275821	
Equipment	600601812	ED:POLE::P275822	
Assembly			
Subject			
Work Type	SDED-C	120	TIER 3/QC FOLLOW-UP
Description	I258 Avian Protection Damaged		
Reference Notification #:	100025870148		
	* 04/22/2024 12:05:31 PST [REDACTED] Phone [REDACTED]		
	* Failure to install wildlife cover on transformer bushing		
	* I258 Avian protection damage		
	* 04/23/2024 06:08:33 PST [REDACTED] Phone [REDACTED]		
	* Completed by [REDACTED] Installed avaian & installed bushing covers 4/18/23.		
Start/End Dates			
Required Start	04/18/2024	00:00:00	Priority no value default
Required End	10/31/2024	00:00:00	
Revision		SDGE	
Responsibilities			
Planner group	[REDACTED] / SDGE		
Main WorkCtr	EDO_MTE	/ SDED	MOUNTAIN EMPIRE ELEC OH
Job Owner	2388	[REDACTED]	
Paving Contract			
Reported by		Notif.date	04/23/2024 06:16:01

B. Violation 2 – Covered Conductor, SDG&E Failed to Install Covered Conductor

It is not necessary for SDG&E to correct the violation identified as Violation 2 within NOV_SDGE_CAC12_20230426_0847 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