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May 10, 2024

**VIA ELECTRONIC FILING  
Dockets 2022-NOV and 2022-QDR**

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 Revised Q4 2022 QDR Geodatabase Files  
Regarding its Response to Notice of Violations NOV\_SDGE\_CAC12\_20230427\_0742  
and NOV\_SDGE\_CAC12\_20230426\_0847**

Dear Program Manager Doherty:

As stated in San Diego Gas & Electric Company's (SDG&E) response to the finding(s) identified in the "Notice of Violation SDGE\_CAC12\_20230427\_0742" and "Notice of Violation SDGE\_CAC12\_20230426\_0847" (together "Notices of Violation or NOVs"), issued by the Office of Energy Infrastructure Safety's (Energy Safety) regarding SDG&E's compliance with its 2022 Wildfire Mitigation Plan (WMP), SDG&E hereby provides this notice of SDG&E's submittal of its revised Q4 2022 quarterly data reports (QDR) geodatabase files.<sup>1</sup>

Specifically, the NOVs describe that on April 26, 2023 and April, 27, 2023, Energy Safety conducted inspections of SDG&E's WMP initiatives in the vicinity of the city of Alpine, California and found the following violations related to SDG&E's 2022 WMP Initiative 7.3.3.3 – Covered Conductor Installation:

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.

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<sup>1</sup> Notice of Violations SDGE\_CAC12\_20230427\_0742 and SDGE\_CAC12\_20230426\_0847 were issued by Energy Safety on April 3, 2024 and April 4, 2024, respectively. SDG&E submitted its response to both NOVs on May 3, 2024 to Energy Safety docket #2022-NOV.

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.

In SDG&E's response to the NOV's, SDG&E provided additional information to reflect that these two violations observed by Energy Safety are the result of a data error in SDG&E's fourth quarter 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 26, 2023 and April 27, 2023 inspections. SDG&E apologizes for the confusion resulting from the data error. It has corrected the data issue in subsequent reporting and hereby resubmits revised Q4 2022 spatial data without the incorrect line data as shown in the table in Attachment A.

Respectfully submitted,

/s/ Laura M. Fulton  
Attorney for  
San Diego Gas and Electric Company

## Attachment A – Incorrect Line Data Removed from 2022 Q4 QDR

GhID	GhLogID	WMPInitiative Activity	GhStatus	CircuitName	Feeder ID	CircuitID	GLOBALIDGUID	SHAPE_Length
Primary-0445-L-CC-2022-19	WMP.455-0445-L-CC-2022	Covered conductor installation	Complete	0445-L-CC-2022	73	{ADF596C A-05CE-4DCA-947E-652D27A3273D}	{B7A2AE67-7362-4CF6-BB34-DEEB60823220}	371.580384
Primary-0448-J-CC-2022-21	WMP.455-0448-J-CC-2022	Covered conductor installation	Complete	0448-J-CC-2022	73	{C3286D0E-6715-4A3B-BBAD-97D06DEB0F25}	{C4173CC0-65A8-46C1-9C9C-D85D8FCD5A29}	412.952461
Primary-0448-O2-CC-2022-24	WMP.455-0448-O2-CC-2022	Covered conductor installation	Complete	0448-O2-CC-2022	73	{F8AFAF11-90E5-48E4-A504-41B8F838DB19}	{4CC9061E-B28B-44AC-A818-DDBDD008FF98}	354.234116
Primary-0448-K2-CC-2022-26	WMP.455-0448-K2-CC-2022	Covered conductor installation	Complete	0448-K2-CC-2022	73	{F3BA82AF-5E25-4183-8638-58768ED1E47C}	{F3BA82AF-5E25-4183-8638-58768ED1E47C}	98.551635
Primary-0157-A-CC-2022-27	WMP.455-0157-A-CC-2022	Covered conductor installation	Complete	0157-A-CC-2022	73	{8100F6EA-6A1D-4219-AF3F-A77D1CB39207}	{8100F6EA-6A1D-4219-AF3F-A77D1CB39207}	105.426031

GhID	GhLogID	WMPInitiative Activity	GhStatus	CircuitName	Feeder ID	CircuitID	GLOBALIDGUID	SHAPE_Length
Primary-0448-J-CC-2023-22	WMP.455-0448-J-CC-2023	Covered conductor installation	In progress	0448-J-CC-2023	73	{7EB8C374-FE0D-4C43-BA6F-415CCA79EAD3}	{7EB8C374-FE0D-4C43-BA6F-415CCA79EAD3}	388.658199
Primary-0448-O2-CC-2023-23	WMP.455-0448-O2-CC-2023	Covered conductor installation	In progress	0448-O2-CC-2023	73	{12ED2D8D-9203-4CFD-A1B4-87632FAFA94D}	{7EB8C374-FE0D-4C43-BA6F-415CCA79EAD3}	200.264007
Primary-0448-K2-CC-2023-25	WMP.455-0448-K2-CC-2023	Covered conductor installation	In progress	0448-K2-CC-2023	73	{4CC9061E-B28B-44AC-A818-DDBDD008FF98}	{4CC9061E-B28B-44AC-A818-DDBDD008FF98}	349.302267
Primary-0157-A-CC-2023-28	WMP.455-0157-A-CC-2023	Covered conductor installation	In progress	0157-A-CC-2023	73	{9606AFF0-4BBF-48CD-A37C-DC21E5D51C3D}	{9606AFF0-4BBF-48CD-A37C-DC21E5D51C3D}	240.096005