



Laura M. Fulton  
Senior Counsel  
8330 Century Park Court, CP32F  
San Diego, CA 92123-1548  
LFulton@SDGE.com

July 29, 2024

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\_CAD\_SDGE\_YLO\_20240606\_08121\_Revision**

Dear Program Manager Doherty:

San Diego Gas & Electric Company (SDG&E) provides this response to the finding(s) identified in the "Notice of Violation CAD\_SDGE\_YLO\_20240606\_08121\_Revision" (Notice of Violation or NOV) issued by the Office of Energy Infrastructure Safety's (Energy Safety) on June 28, 2024,<sup>1</sup> 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 June 6, 2024, Energy Safety conducted an inspection of SDG&E's WMP initiatives in the vicinity of the city of Fallbrook, California and found the following violation:

Violation 1 – Energy Safety observed that in implementing 2023 WMP initiative 8.1.2.10.1 - Avian Protection Program (WMP.972), SDG&E failed to complete the Avian Protection Installation on pole ID P218236 at coordinates 33.3911329330061, -117.232570455604. Energy Safety considers this completeness violation to be in the Minor risk category.

SDG&E is not requesting a written hearing for the findings 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

---

<sup>1</sup> As stated in the revised NOV, "[t]his first revision to NOV SDGE\_YLO\_20240606\_0812 should be read to supersede the original NOV SDGE\_YLO\_20240606\_0812 and trigger a new response period." The original NOV was issued on June 14, 2024.

not merit referral, as there is inadequate support for a finding that SDG&E has failed to substantially comply with its approved WMP.<sup>2</sup>

## I. SDG&E RESPONSE

### A. Violation 1 – Avian Mitigation, Avian Protection Cover is Dislodged (P218236)

SDG&E has corrected the violation identified as Violation 1 within NOV\_CAD\_SDGE\_YLO\_20240606\_08121\_Revision. SDG&E identified this issue on pole ID P218236 on September 18, 2023 and opened a corrective work order to resolve it by July 31, 2024. On July 1, 2024, a crew completed repairs to resolve the avian protection issue at the location identified within the NOV. The screenshot below provides the corrective notification showing the status of the work at the time the NOV was issued.

**Change PM Notification: ED (SDE) Corr Maint**

Notification: 100024533333 1B I258 Avian Protection Damaged

Notific. Status: OSNO NEW FLUP

Order: [ ]

Notification Hdr	Location	Items
<b>Reference object</b>		
Functional loc.	ED.NRE.AVOC.L133...	ED:POLESEG:P238011
Equipment	600068901	ED:POLE::P218236
Assembly		
<b>Subject</b>		
Work Type	SDED-C 142	Tier 2 Drone Follow-up (10-month)
Description	I258 Avian Protection Damaged	
<pre> 05/06/2024 09:15:07 PST [REDACTED] *PER [REDACTED] ASSIGN TO [REDACTED] ASSIGNED 3/30 PER [REDACTED] TO PLANNER TO [REDACTED] 05/13/2024 11:07:38 PST [REDACTED] PER [REDACTED] JOB HAS BEEN GENERATED TO ARSO 530000357205 06/05/2024 12:28:03 PST [REDACTED] Phone [REDACTED] FW: P218236 CMP DUE JULY CONST READY 530000357205 - ***EXTENDED DAY***OH CREW (1) 7/1/24 </pre>		
<b>Start/End Dates</b>		
Required Start	09/18/2023 00:00:00	Priority no value default
Required End	07/31/2024 00:00:00	
Revision		SDGE
<b>Responsibilities</b>		
Planner group	[ ] / SDGE	
Main WorkCtr	EDO_NRE / SDED NORTHEAST ELEC OH	
Job Owner	117 [REDACTED]	
Paving Contract	[ ]	
Reported by	[REDACTED]	Notif.date 09/19/2023 06:17:17

<sup>2</sup> See Pub. Util. Code §8386.1.

Attachment SDGE\_NOV\_CAD\_SDGE\_YLO\_20240606\_0812\_Response\_Attachment is the completed as-built form for the work performed on July 1, 2024.

## 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

# **Attachment 1 – As Built Form for P218236**

# ASBUILT FORM

<b>Header Section</b>			
Notification #	300000709278	Work Order #	530000357205
		Operation #	0006
Job Name	P218236 TIER 2 AVIAN DUE 7/2024		Construction Supr. / FOS
Address	1436 HILLCREST LN.	Street2	
		City	
		Zipcode	00000
Circuit	520	Not Built To Design Requires Recalculation	<input type="checkbox"/>
		No Material Used	<input type="checkbox"/>
Event ID		TOM Bros	1027J1
Order Comments	Special Ins :Damaged/Missing High Volt Sign - 1-::HLO only crew to remove bird guard		
Crew Comments			

<b>Order Completion Section</b>			
All Materials have been installed and tested in accordance with the applicable SDGE Standards.			
Crew Foreman ID		Crew Foreman	
		Completion Date	2024-07-01

## Electric Maintenance Section

Facility ID: P218236      Job Description: P218236 TIER 2 AVIAN DUE 7/2024

### Pending Conditions

Equipment Type	Condition Code	Status	Notes
Pole	I236 - Damaged/Missing High Volt Sign - 1-Man	0020 - Field Cleared	COMPLETED
Pole	I258 - Avian Protection Damaged	0020 - Field Cleared	COMPLETED

### Additional Conditions

Equipment Type	Condition Code	Status	Notes

## Location & Material Section

Location #	0001	Location Description	Location 0001
Existing Structure #	P218236	New Structure #	
Location Service / Meter Address			

### Location Comment

Avian Protection Damaged/HS::

### Location Crew Comment

(Empty comment box)

CU ID	Work Function	Stock Code	Stock Description	UOM	Plan. Qty.	Act. Qty.	As Designed
PIRM	REMOVE	S289672	COVER, INSULATOR, TANGENT, SIDE TIE, TOP	EA	1.000	1	<input type="checkbox"/>

## Location Completion

All Materials have been installed and tested in accordance with the applicable SDGE Standards.			
Crew Foreman ID		Crew Foreman	
		Completion Date	2024-07-01

**Tag Identification**

*No Tag Information for this Location*

**Equipment Information**

No Equipment Information for this Location