



Laura M. Fulton  
Senior Counsel  
8330 Century Park Court, CP32F San  
Diego, CA 92123-1548  
[LFulton@SDGE.com](mailto:LFulton@SDGE.com)

November 19, 2024

**VIA ELECTRONIC FILING**

**OEIS Docket # 2024-SVM**

Sheryl Bilbrey  
Program Manager, Environmental Science Division  
Office of Energy Infrastructure Safety  
715 P Street, 20th Floor  
Sacramento, CA 95814

**RE: San Diego Gas & Electric's (SDG&E) Notification of Completion of Substantial Vegetation Management in accordance with California Public Utilities Code Section 8386.3.(c)(5)(A)**

Dear Program Manager Bilbrey:

In accordance with California Public Utilities Code Section 8386.3(c)(5)(A), SDG&E is providing notification to the Office of Energy Infrastructure Safety that San Diego Gas & Electric (SDG&E) has completed a substantial portion of its 2024 Wildfire Mitigation Plan (WMP) vegetation management initiatives.<sup>1</sup> A complete detail of SDG&E's progress on its WMP targets may be found in SDG&E's Quarterly Notification Letters and Updates to Energy Safety, consistent with Public Utilities Code Section 8389(e)(7). SDG&E provides the following activities as representative of its completion of a substantial portion of its 2024 WMP Vegetation Management Initiatives as of November 5, 2024.

SDG&E's Detailed Inspections activity (SDG&E WMP 8.2.2.1) is the annual inspection of all inventory trees within the service territory. SDG&E's 2024 target for this initiative is 485,400 trees, and thus far, SDG&E has completed inspections on approximately 449,709 trees. Overall, SDG&E has achieved 93% completion for this target, and expects to reach the 2024 target by year's end.

SDG&E's Off-Cycle Patrol activity (SDG&E WMP initiative 8.2.2.2) is the second annual pre-inspection activity for trees located within the utility strike-zone in the HFTD. For this initiative, SDG&E aims to complete an off-cycle patrol in all 106 Vegetation Management Areas (VMA) of its service territory that are wholly or partially within the HFTD. SDG&E has completed its annual target of 106 VMAs.

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<sup>1</sup> SDG&E interprets substantial completion to mean completion of 80% or more of the annual target for each initiative.

SDG&E's Pole Clearing (Brushing) (SDG&E WMP Initiative 8.2.3.1) is the removal of vegetation surrounding poles subject to Public Resources Code 4292. SDG&E's target for this initiative is 33,010 poles. To date, SDG&E has completed clearing on 36,390 poles.

SDG&E's Enhanced Trim/Removals activity (SDG&E WMP initiative 8.2.3.3) includes the application of enhanced time-of-trim clearances on targeted species and the removal of trees located within the HFTD. SDG&E's 2024 target for this initiative is 11,200 trees. To date, SDG&E has completed 11,208 units under this initiative.

As previously reported to Energy Safety's Environmental Services Division, SDG&E will not meet the Fuels Management Program targets (SDG&E WMP initiative 8.2.3) for 2024. This initiative consists of the thinning of vegetative fuels around structures subject to pole brushing to a radius greater than required by law. SDG&E has completed 147 poles this year and does not anticipate meeting its target of 500 poles, in part due to efforts to plan work around SDG&E's pending General Rate Case and affordability concerns. SDG&E notes that this initiative is an expansion of WMP initiative 8.2.3.1 (Pole Clearing). Therefore, even though fuels management activities did not occur on all 500 poles targeted through this enhanced program, these same poles were all subject to pole cleaning activity in 2024, achieving overall risk reduction and compliance with regulatory requirements.

Respectfully submitted,

/s/ Laura M. Fulton

Attorney for

San Diego Gas and Electric

Company