



November 20, 2024

Lena McMillin
Wildfire Mitigation Program Manager
San Diego Gas and Electric
8316 Century Park Court
San Diego, CA 92123

NOTICE OF VIOLATION

Ms. McMillin:

Pursuant to Public Utilities Code section 326 and Government Code section 15475.1, the Office of Energy Infrastructure Safety (Energy Safety) has conducted an inspection of work completed by San Diego Gas and Electric (SDG&E) in accordance with its 2024 Wildfire Mitigation Plan (WMP) and determined the existence of a violation. Energy Safety therefore issues SDG&E a Notice of Violation (NOV), identifying noncompliance with an approved WMP or any law, regulation, or guideline within the authority of the Office.¹

On September 25, 2024, Energy Safety conducted an inspection of SDG&E's WMP initiatives in the vicinity of the city of Escondido in High Fire Threat District (HFTD) Tier 3. The inspection report is enclosed herewith. Energy Safety found the following violation:

Violation 1. Energy Safety observed that in implementing WMP initiative 8.2.3.1 - Pole Clearing (WMP .512), SDG&E failed to complete its work at pole ID 814864, at coordinates 33.158108, -116.977228. Energy Safety considers this violation to be in the "Minor" risk category.

Response Options

In accordance with Energy Safety Guidelines,² within 30 days from the issuance of this NOV, SDG&E must provide a response informing Energy Safety of corrective actions taken or planned to remedy the above identified violation and prevent recurrence. Alternatively, should SDG&E disagree with the NOV, SDG&E must submit to Energy Safety a response stating it disagrees with the violation, the reason or justification for the disagreement and all supporting documentation.³ This response shall be filed in the Energy Safety e-Filing

¹ Cal. Code Regs., tit. 14, section 29302(b)(2)

² Energy Safety Compliance Guidelines, pp. 4-5

³ Energy Safety Compliance Guidelines, pp. 4-5

system under the 2024 NOV Docket⁴ and the associated file name(s) must begin with the NOV identification number provided above.

SDG&E may also request an informal conference with Energy Safety's Environmental Science Division for the purpose of disputing any issues raised in this NOV no later than five (5) business days before the 30-day response deadline.⁵ Requests for informal conference with Energy Safety must be e-mailed to environmentalscience@energysafety.ca.gov, with a copy sent to Elizabeth.McAlpine@energysafety.ca.gov. Pursuant to Government Code section 15475.4, if SDG&E intends to request a hearing "to take public comment or present additional information," it must also do so within the 30-day timeframe. If a petition for hearing is not received by the deadline, then the determination and conditions set forth in this NOV become final.

Pursuant to Public Utilities Code section 8389(g), Energy Safety may refer this matter to the California Public Utilities Commission for consideration of an enforcement action.

Sincerely,



Sheryl Bilbrey
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Cc:

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⁴ <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2024%20NOV>

⁵ Energy Safety Compliance Guidelines, p. 4



INSPECTION REPORT

Overview

The Office of Energy Infrastructure Safety (Energy Safety) conducts inspections to verify the work performed by an electrical corporation as reported in an approved Wildfire Mitigation Plan (WMP), and to assess general conditions of electrical infrastructure that may adversely impact an electrical corporation’s wildfire risk. A Notice of Violation (NOV) is issued for any instances of noncompliance discovered during an inspection related to an electrical corporation’s execution of its WMP initiatives.

Energy Safety has designated this violation as minor risk. SDG&E must correct the violation pursuant to the timeline provided in Table 1.⁶

Table 1. Risk Category and Correction Timelines

Risk Category	Violation correction timeline
Severe	<ul style="list-style-type: none">• Immediate resolution
Moderate	<ul style="list-style-type: none">• 2 months (in High Fire Threat District (HFTD) Tier 3)• 6 months (in HFTD Tier 2)• 6 months (if relevant to worker safety; not in HFTD Tier 3)
Minor	<ul style="list-style-type: none">• 12 months or resolution scheduled in WMP update

⁶ Energy Safety Compliance Guidelines, p. 3



Inspection Summary

The inspection location and WMP initiative summary is included in Table 2. The WMP inspection violation is included in Table 3.

Table 2: Inspection Location and WMP Initiative Summary

Electrical Corporation:	San Diego Gas and Electric
Report Number:	NOV ESD_SDGE_CAC23_20240925_1227
Inspector:	CAC23
WMP Year Inspected:	2024
Quarterly Data Report (QDR) Referenced:	Quarter 2 (Q2)
Inspection Selection:	Energy Safety inspected the locations based on SDG&E's Q2 QDR.
Relevant WMP Initiative(s):	8.2.3.1 Pole Clearing (WMP .512)
Date of inspection:	September 25, 2024
City and/or County of Inspection:	Escondido, California
Inspection Purpose:	Assess the accuracy of SDG&E's QDR data, completeness of its work, compliance with WMP requirements, and compliance with its protocols.

Table 3: WMP Inspection Violation

Violation #	Structure ID	VMP ID	Lat/Long	HFTD	Initiative Number	Violation Type	Severity	Correction Timeline	Violation Description
Violation 1	814864	357-CZ1004	33.158108, -116.977228	Tier 3	8.2.3.1 - Pole Clearing (WMP .512)	Completeness	Minor	12 months	Failure to completely clear around pole 814864.

Inspection Findings

Violation 1:

Relevant Requirement:

SDG&E's WMP states the following regarding initiative number 8.2.3.1 Pole Clearing: "Mechanical pole brushing is the clearing all vegetation around the base of a pole down to bare mineral soil for a radius of 10 feet from the outer circumference of the pole; removing all live vegetation within the cylinder up to a height of 8 feet above ground; and removing all dead vegetation up to the height of the conductors. Mechanical brushing is typically performed in the spring months."⁷

Finding:

Energy Safety concludes that Violation 1 is "Minor" because the remaining vegetation fuel bed consists of light flashy fuels in the form of desiccated vegetation and leaf litter.

At VMP ID357-CZ1004 near GPS coordinates 33.158108, -116.977228 in Escondido, SDG&E reported that it completed work under its Pole Clearing program (.512 WMP initiative number 8.2.3.1). SDG&E's Q3 data reports that pole ID 814864 located along Old Guejito Grade Road was mechanically cleared. However, the inspector observed that SDG&E did not complete its pole clearing activity at the location, having left ground cover within the 10-foot clearance radius. Dead vegetation was also present within the 10-foot clearance radius. That dead vegetation appeared to consist of the same ground cover vegetation which was growing there in addition to leaf litter and other flammable debris. The inspector's observation is documented in Violation 1 photographs, which are exhibits to this report. Photo numbers Item1G1mg1 and Item1G1mg2 depict the pole ID 814864 and the overall pole. Photo numbers Item1G1mg3, Item1G1mg4, and Item1A11mg1 show the desiccated vegetation and additional leaf litter at the base of the pole within the 10-foot radius.

⁷ SDG&E's 2023-2025 WMP (Rev. #2.1, June 7, 2024) p. 273.
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true>, accessed Oct. 24, 2024).

Exhibits

Exhibit A: Photo Log

Structure ID: 814864

Violation 1



Item1GImg1: Pole ID 814864



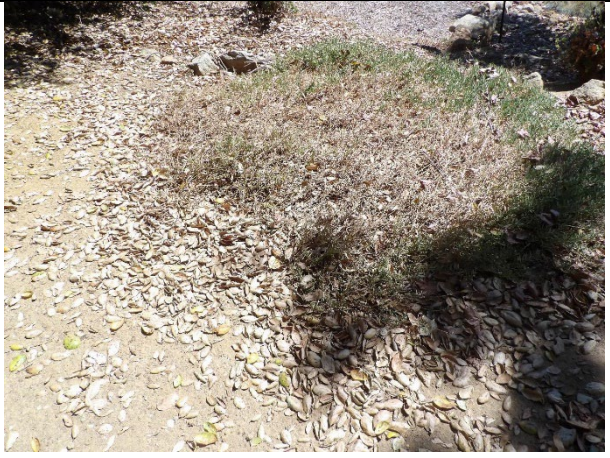
Item1GImg2: Overall pole and vegetation near the base of the pole.



Item1GImg3: Vegetation within the 10-foot radius of the pole.



Item1GImg4: Vegetation within the 10-foot radius of the pole.



Item1IA1Img1: Closeup view of dry vegetation.