



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

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VIA ELECTRONIC FILING

Docket # 2024 NOV

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 Company's Response to Notice of Violation –
ESD_SDGE_RGA_20241003_1045**

Dear Program Manager Bilbrey:

San Diego Gas & Electric Company (SDG&E) provides this response to the finding identified in the Notice of Violation “ESD_SDGE_RGA_20241003_1045” (Notice of Violation or NOV) issued by the Office of Energy Infrastructure Safety (Energy Safety) on October 30, 2024 regarding Energy Safety’s inspection of work completed by SDG&E in accordance with its 2024 Wildfire Mitigation Plan (WMP). Specifically, the NOV describes that on October 3, 2024, Energy Safety conducted an inspection of SDG&E’s WMP initiatives in the vicinity of the city of Jamul, California and 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 adhere to protocol on pole P775836 at coordinates 32.713864, -116.887710. Energy Safety considers this violation for adherence to protocol to be in the “Moderate” 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 not merit referral, as there is inadequate support for a finding that SDG&E has failed to substantially comply with its approved WMP.¹

¹ See Pub. Util. Code §8386.1.

I. SDG&E RESPONSE

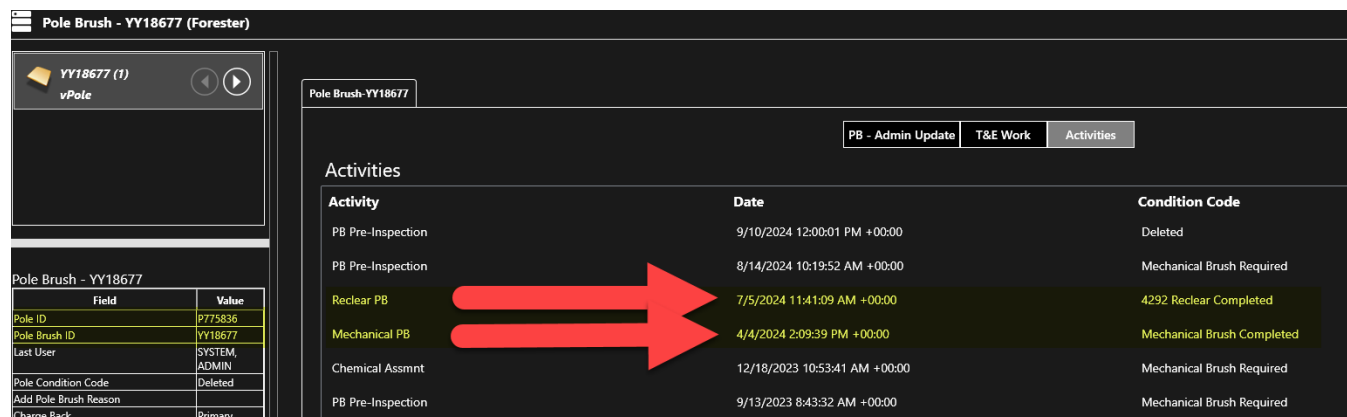
A. Violation 1 – Pole Clearing, Failure to Achieve Required Clearance Around P775836.

SDG&E respectfully notes that Pole P775836 is technically exempt from the clearance requirements of Public Resources Code (PRC) 4292 based on the classification of the equipment mounted on this pole. The hot-line-clamp connectors on this pole are of the type defined by Cal Fire as exempt pursuant to Cal. Code Regs. Title 14, Section 1255. SDG&E is providing the following link to the *California Power Line Fire Prevention Field Guide* (2021 Edition) which describes the types of equipment exempt from PRC 4292 (see page 103):

[2021-power-line-fire-prevention-field-guide-ada-final_jf_20210125.pdf](#)

As such, SDG&E contends it is not required to maintain a firebreak around this pole. Though not required, SDG&E has historically elected to partially clear the radius of this pole as a discretionary fire safety measure. SDG&E performed mechanical clearing of vegetation within the 10-foot radius of this pole on 4/4/24, and again on 7/5/24 during a re-clear activity.

Figure 1. Screenshot of SDG&E work management system, *Epoch*, documenting partial pole clearing activity dates of P775836 in 2024.



Pole Brush - YY18677 (Forester)	
YY18677 (1)	vPole
Pole Brush - YY18677	
Field	Value
Pole ID	P775836
Pole Brush ID	YY18677
Last User	SYSTEM, ADMIN
Pole Condition Code	Deleted
Add Pole Brush Reason	
Charge Back	Primary

Pole Brush - YY18677		
Activity	Date	Condition Code
PB Pre-Inspection	9/10/2024 12:00:01 PM +00:00	Deleted
PB Pre-Inspection	8/14/2024 10:19:52 AM +00:00	Mechanical Brush Required
Reclear PB	7/5/2024 11:41:09 AM +00:00	4292 Reclear Completed
Mechanical PB	4/4/2024 2:09:39 PM +00:00	Mechanical Brush Completed
Chemical Assmnt	12/18/2023 10:53:41 AM +00:00	Mechanical Brush Required
PB Pre-Inspection	9/13/2023 8:43:32 AM +00:00	Mechanical Brush Required

SDG&E made note and reference to its discretionary pole brushing activities in its WMP. However, SDG&E also continued to include such discretionary pole clearing in its quarterly reporting, which made them subject to Energy Safety field audits. As part of its affordability initiative, SDG&E is reviewing its practice of discretionary pole brushing where it is not required under PRC 4292. This would include ceasing clearing non-subject poles that carry only exempt equipment and/or poles that are located within the Local Responsibility Area and revising its quarterly reporting to exclude such discretionary activities. SDG&E discussed its considered modification to pole clearing activities as well as its initial response to this NOV during its monthly meeting with Environmental Sciences Division on 11/12/24.

Given that P775836 is exempt from PRC 4292, SDG&E is electing not to clear the vegetation within the 10-foot radius. The property owner has planted and maintained the

vegetation (ice plant, *Malephora crocea*) for the purpose of landscaping and erosion control. This vegetation within the radius does not impose any climbing space restriction to access the pole. Removing this vegetation where it is not required by law could be construed by the customer as unnecessary and over-reaching.

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