



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

December 17, 2024

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\_CAC23\_20240925\_1227**

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\_CAC23\_20240925\_1227” (Notice of Violation or NOV) issued by the Office of Energy Infrastructure Safety’s (Energy Safety) on November 20, 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 September 25, 2024, Energy Safety conducted an inspection of SDG&E’s WMP initiatives in the vicinity of the city of Escondido, 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 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.

As further summarized below, SDG&E has taken remedial action to further clear the identified pole. 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.<sup>1</sup>

---

<sup>1</sup> See Pub. Util. Code §8386.1.

## I. SDG&E RESPONSE

### A. Violation 1 – Pole Clearing, Failure to Completely Clear Around Pole 814864.

SDG&E has field-reviewed the NOV observation from Energy Safety of vegetation within the clearance radius surrounding Pole P814864. SDG&E's records show this pole was cleared for compliance with PRC 4292 on two separate occasions in 2024 prior to Energy Safety's inspection beginning with a mechanical brushing activity on 4/3/24, then again during the re-clearing activity on 9/4/24. On both occasions a small patch of Rosemary (*Rosmarinus officinalis*) vegetation growing within the 10-foot radius was left intact as it was considered exempt from clearing due to its low probability of ignition and propagation, and that the customer likely planted and maintained the vegetation as landscaping.

SDG&E agrees with Energy Safety's finding that the desiccated vegetation within the patch of Rosemary in the cleared radius should be removed. The oak leaf cast also observed by Energy Safety within the cleared radius is a common occurrence where there are trees located immediately adjacent to a cleared pole. The fallen leaf cast observed during Energy Safety's inspection on 9/25/24 would have occurred after the re-clear activity earlier in September.

In follow-up to the NOV, SDG&E re-cleared the radius surrounding P814864 including the complete removal of the patch of Rosemary vegetation, and the leaf litter cast.<sup>2</sup>

SDG&E is providing the following screenshots as supporting evidence as Attachment A:

- Dispatch work order created for the pole brushing activity in response to the NOV
- Image of the pole clearing record for P814864 showing the brush activity dates in 2024
- Photo of the post-NOV pole brushing activity which occurred 11/25/24

## 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

---

<sup>2</sup> Please note that SDG&E completed the post-NOV follow-up pole clearing activity on 11/25/24, however, the electronic record of this activity was not entered into the system until 12/2/24.

## **Attachment A – Screenshots**

**NOV ESD\_SDGE\_CAC23\_20240925\_1227;(Pole P814864; Pole record CZ1004)**

**Figure 1:** Screenshot of pole clearing dispatch work order documenting SDG&E response to NOV.

**Note:** The actual pole clearing activity follow-up to the NOV occurred on **11/25/24**. The electronic record of this activity was not entered into the system until **12/2/24**.

The screenshot displays a web-based work order management system. At the top, there is a navigation bar with tabs for 'My Work', 'Service Requests', 'Work Orders', 'Projects', 'Reports', 'GIS Search', 'Recent Activity', and 'Asset Analytics'. Below this is a toolbar with icons for 'Work Order', 'Email', 'Print', 'Save', 'Close', 'Delete', 'Send to MDT', and 'Recall Work Order'. The main content area is divided into several panels:

- Work Order Panel:** Contains fields for Description (VM PB REBRUSH), Number (1225963700), ETS STATUS, Entity Type (VPOLE), Category (VM Pole Brush), Initiated By, Date (12/2/2024 8:51 AM), Status (Open), Priority (Same Day), Requested By, Supervisor, Submit To, Date (12/2/2024 11:16 AM), Projected Start (12/2/2024 8:51 AM), Projected Finish (12/7/2024 8:51 AM), Opened By, Date (12/2/2024 1:42:00 PM), Closed By, Date, Completed By, Actual Start (12/2/2024 8:51 AM), and Actual Finish (12/2/2024 11:00 AM). A comments section at the bottom shows a comment from a redacted user on 12/2/2024 at 8:52 AM: "Rebrush WO for Notice of violation related to an inspection performed by the Office of Energy Infrastructure Safety and SDG&E VM for P814864/CZ1004".
- Location Information Panel:** Includes fields for WO Address, Location Details, VMA (357), District (Northeast), Thom Bros Map (1111C4), Page, X Location (1,647,383.276), and Y Location (12,036,771.531).
- Assets Panel:** Shows 'Total Entities: 1' and a table with columns: Asset, Asset Id, Asset Uid, Location, Warranty Date, Work Completed, and Feat. One asset is listed: VPOLE, 46619, CZ1004, with 'Work Completed' checked and 'Feat' as VPO.
- Map Layer Fields Panel:** Contains a 'Reset' button.
- Work Cycle Panel:** A partially visible panel at the bottom.

**Figure 2:** Screenshot of pole clearing record highlighting clearing activity dates in 2024.

**Note:** The actual pole clearing activity follow-up to the NOV occurred on **11/25/24**. The electronic record of this activity was not entered into the system until **12/2/24**.

**CZ1004 (1)**  
vPole

Pole Brush - CZ1004

PB - Admin Update   T&E Work   **Activities**

### Activities

Activity	Date	Condition Code
Reclear PB	12/2/2024 10:57:54 AM +00:00	Completed Rework
Admin Update	12/2/2024 9:05:19 AM +00:00	Audited, Requires Rework
Admin Update	12/2/2024 8:54:43 AM +00:00	Audited, Requires Rework
PB Pre-Inspection	9/27/2024 7:38:39 AM +00:00	Mechanical Brush Required
Chemical Assmnt	9/24/2024 1:17:57 PM +00:00	Mechanical Brush Required
Reclear PB	9/4/2024 1:18:19 PM +00:00	4292 Reclear Completed
Mechanical PB	4/3/2024 9:43:18 AM +00:00	Mechanical Brush Completed
Chemical Assmnt	12/4/2023 3:01:38 PM +00:00	Mechanical Brush Required
PB Pre-Inspection	10/18/2023 11:35:08 AM +00:00	Mechanical Brush Required
Reclear PB	10/18/2023 9:11:21 AM +00:00	4292 Reclear Completed
Mechanical PB	5/18/2023 3:22:26 PM +00:00	Mechanical Brush Completed
PB Pre-Inspection	10/13/2022 9:43:07 AM +00:00	Mechanical Brush Required
Chemical Assmnt	10/5/2022 9:41:42 AM +00:00	Mechanical Brush Required

Pole Brush - CZ1004

Field	Value
Pole ID	P814864
Pole Brush ID	CZ1004
Last User	
Pole Condition Code	Completed Rework
Add Pole Brush Reason	
Charge Back	Primary Distribution
CustomerBrush	
ESA Indicator	No
HFTD Tier	Tier-3
Add Date	4/28/1999 9:50:20 AM
Inventory	Yes
Last Activity	Reclear PB
Last Audit Date	10/4/2016 9:42:51 AM
Last Audit Results	Pass
Last Brush Date	12/2/2024 10:57:54 AM
Last Inspection	12/2/2024 9:05:19 AM

**Figure 3:** Image of post-pole clearing activity at Pole P814864 completed 11/25/24.

