



December 19, 2024

Lena McMillin
Wildfire Mitigation Program Manager
San Diego Gas and Electric
8326 Century Park Court CP32F
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 24, 2024, Energy Safety conducted an inspection of SDG&E's WMP initiatives in the vicinity of the city of Pauma Valley 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 8.2.3.3 - Clearance, SDG&E failed to adhere to its protocol for 8.2.3.2 Wood and Slash Management (WMP.497) near pole ID 414181 at coordinates 33.291722, -116.968414. Energy Safety considers this violation for adherence to protocol 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,

A handwritten signature in black ink that reads "Sheryl Bilbrey". The signature is written in a cursive, flowing style.

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 as 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_20240924_1133
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):	8.2.3.2 Wood and Slash Management (WMP.497)
Date of inspection:	September 24, 2024
City and/or County of Inspection:	Pauma Valley, 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	414181	392-SM6809-TT	33.291722, -116.968414	Tier 3	8.2.3.2 - Wood and Slash Management (WMP .497)	Adherence to Protocol	Minor	12 months	Failure to manage slash.

Inspection Findings

Violation 1:

Relevant Requirement:

SDG&E's WMP states the following regarding initiative number 8.2.3.2 Wood and Slash Management (WMP .497): "Wood and slash management (WMP.497) are a component of tree trimming and removal operations. Most of the wood and slash debris resulting from routine trimming and removal activities are chipped on site and removed from the property the same day the work is performed."⁷

SDG&E's WMP continues by stating, "Vegetation debris (i.e., slash) generated from fuels management and vegetation management activities are typically removed from the project site unless it is determined that a portion of the debris can be used on site for soil cover or other purposes. This determination is made upon review by Environmental Services. Property owners may also request that debris be left on sight as chipped material for ground cover or landscaping."⁸

Finding:

Energy Safety concludes that Violation 1 is "Minor" because the slash pile was outside of the pole clearing radius but presents a potential fuel source for wildfire.

The reported location provided by SDG&E indicated that it completed work for its Clearance program (WMP initiative number 8.2.3.3) in April 2024. Near pole ID 414181, located near 16707 Highway 76 in Pauma Valley at GPS coordinates 33.291722, -116.968414, the inspector observed slash less than six inches in diameter piled originating from the clearance work on a river red gum (*Eucalyptus camaldulensis*). The inspector's observation is documented in Violation 1 photographs, which are exhibits to this report. Photo number Item1GIimg1 depicts a close-up view of pole ID 414181. Photo numbers Item1GIimg2 and Item1IA1img4 show the overall pole with the trimmed Eucalyptus in view. Photo numbers Item1IA1img1, Item1IA1img2, and Item1IA1img3 depict the inspector's observation of the clearance work performed on the Eucalyptus and the subsequent slash pile at the base of the river red gum tree.

⁷ SDG&E's 2023-2025 WMP (Rev. #2.1, June 7, 2024) p. 274

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true>, accessed November 8, 2024).

⁸ SDG&E's 2023-2025 WMP (Rev. #2.1, June 7, 2024) p. 274

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56793&shareable=true>, accessed November 8, 2024).

Exhibits

Exhibit A: Photo Log

Structure ID: 414181

Violation 1

 A close-up photograph of a utility pole. A white warning sign is attached to the pole. The sign features a red triangle with a lightning bolt and the word "WARNING" in red. Below this, it says "KEEP OFF!" in black, followed by a black silhouette of a person falling. The sign also contains the text "Hazardous voltage above. Do not touch. Shock, burn or cause death." and "Structure ID: P414181". There are also fields for "Year" (filled with "2019") and "Circuit/Switch Station" (filled with "DIR 217").	 A photograph showing the utility pole in its full context. The pole is a dark, weathered metal. It is surrounded by dense green foliage, including several large trees with thick, light-colored trunks. A white fence runs along the base of the pole. The sky is clear and blue.
<p>Item1Gimg1: Pole ID 414181. Photo taken December 4, 2024.</p>	<p>Item1Gimg2: Overall pole with trimmed Eucalyptus in view. Photo taken December 4, 2024.</p>



Item1IA1Img1: Clearance work performed on the river red gum. Photo taken on September 24, 2024.



Item1IA1Img2: View showing the pile of slash. Photo taken on September 24, 2024.



Item1IA1Img3: View showing pile of slash. Photo taken December 4, 2024.



Item1IA1Img4: Overall pole with trimmed Eucalyptus in view. Photo taken December 4, 2024.