



December 19, 2024

Lena McMillin
Team Lead, Wildfire Mitigation Program Compliance
San Diego Gas & Electric Company
8316 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 & Electric Company (SDG&E) in accordance with its 2024 Wildfire Mitigation Plan (WMP) and determined the existence of one or more violations. 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 October 9, 2024, Energy Safety conducted an inspection of SDG&E's WMP initiatives in the vicinity of the city of El Cajon, California. The inspection report is enclosed herewith. Energy Safety found the following violation(s):

Violation 1. Energy Safety observed that in implementing 2024 WMP initiative 8.1.2.10.1 Avian Protection Program (WMP.972), SDG&E failed to provide accurate data in reporting that avian protection was installed on Pole ID P76656, Grid Hardening ID 530000350444-P76656 at coordinates 32.85594773165022, -116.8373373489954.

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

Response Options

Energy Safety may prescribe a timeframe for resolution of a violation associated with the assigned risk category.² Within 30 days from the issuance date of this NOV, the electrical corporation must provide a response advising Energy Safety of corrective actions taken or planned to remedy the above identified violation(s) and prevent recurrence. Alternatively, the electrical corporation must advise Energy Safety that it will not correct the violation, including the reasoning or justification for inaction and all supporting documentation.³

This response shall be filed in the Energy Safety e-Filing system under the 2024 NOV Docket⁴ and the associated file name(s) must begin with the NOV identification number provided above.

Pursuant to Government Code section 15475.4, if the electrical corporation 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.

Prior to its response or request for hearing, the electrical corporation may also request an informal conference with Energy Safety’s Compliance Assurance Division for the purpose of disputing any issues raised in this NOV no later than five (5) business days before the response deadline.⁵ Requests for informal conference with Energy Safety must be e-mailed to compliance@energysafety.ca.gov, with a copy sent to all Energy Safety Compliance Assurance Division staff identified in the NOV.

Pursuant to Public Utilities Code section 8389(g), following receipt of the electrical corporation’s response to this NOV and resolution of any disputes, this matter may be referred to the California Public Utilities Commission for its consideration of potential enforcement action, as it deems appropriate.

Sincerely,



Patrick Doherty
Program Manager | Compliance Assurance Division
Office of Energy Infrastructure Safety
Patrick.doherty@energysafety.ca.gov

Cc:

Lena McMillin, SDG&E
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² Energy Safety Compliance Guidelines, pp. 3

³ Energy Safety Compliance Guidelines, pp. 4-5

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

⁵ Energy Safety Compliance Guidelines, p. 4

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INSPECTION REPORT

Overview

Inspection Categories

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) or subsequent filing, 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.

Correction Timelines

Violations must be corrected in a timely manner. Energy Safety may prescribe a timeframe for resolution of a violation. If Energy Safety assigns a risk category to a violation, an electrical corporation must correct the violation as required per the timelines provided in Table 1.⁶

Table 1. Risk Category and Correction Timelines

Risk Category	Violation and defect 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 Tiers 2 or 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

Table 2 provides a summary of the selection of the WMP inspection location and initiative. Table 3 provides a summary of the violation(s) found during the inspection. Details regarding the inspection that identified the violation(s) are provided in the Inspections Details Section below.

Table 2: Inspection Location and Initiative Summary

Electrical Corporation:	San Diego Gas & Electric Company
Report Number:	CAD_SDGE_LOK_20241009_0804
Inspector:	Lovepreet Kaur
WMP Year Inspected:	2024
Quarterly Data Report (QDR) Referenced:	Quarter 2 (Q2)
Inspection Selection:	Energy Safety viewed the contents of the Q2 QDR and performed an analysis that resulted in the selection of the WMP initiatives and locations referenced in this report.
Relevant WMP Initiative(s):	8.1.2.10.1 Avian Protection Program (WMP.972)
Date of inspection:	October 9, 2024
City and/or County of Inspection:	El Cajon, San Diego County
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(s)

Violation #	Structure ID	Grid Hardening ID	Lat/Long	HFTD	Initiative Number	Violation Type	Severity	Violation Description
Violation 1	P76656	530000350444-P76656	32.85594773165022, -116.8373373489954	Tier 3	8.1.2.10.1 Avian Protection Program (WMP.972)	Data Accuracy	N/A	No avian protections observed at the location

Inspection Details

Violation 1:

Relevant Requirement:

SDG&E's WMP states the following regarding initiative number 8.1.2.10.1 – Avian Protection Program (WMP.972) on poles:

1. "Involves installing avian protection equipment on distribution poles in the service territory to prevent electrocution of birds and to facilitate compliance with Federal and State Laws."⁷

Version 3.1 of Energy Safety's Data Guidelines states the following with respect to data submitted by an electrical corporation when reporting on its 2023 WMP initiatives:

2. "Electrical corporations must ensure location accuracy in their [geographic information system] data submissions..."⁸

Finding:

On Pole ID P76656, Grid Hardening ID 530000350444-P76656 at 15532 Olde Highway 80, El Cajon, CA, 92021, USA, 32.85594773165022, -116.8373373489954 the inspector observed that avian protection covers were not installed. The inspector's observation is documented in Violation 1 photographs, which are attachments to this report. Photo numbers Item1Gimg1, Item1Gimg2, and Item1IA1img1 depict that no avian protection covers were installed.

Energy Safety concludes that:

1. The data provided by SDG&E indicated that work on the Avian Protection Program (WMP.972, 2023 WMP Initiative 8.1.2.10.1) was completed at the location.
2. Avian protection covers were not observed at the location.

⁷ San Diego Gas & Electric Company, "2023-2025 Wildfire Mitigation Plan," October 23, 2023. p. 172 [Online]. Available: <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true>

⁸ Office of Energy Infrastructure Safety, "Data Guidelines, Version 3.1," February 17, 2023, p. 10 [Online]. Available: <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53475&shareable=true>


Exhibits

Exhibit A: Photo Log

Structure ID: P76656

Violation 1

 A photograph showing a wooden utility pole with multiple cross-arms and wires. The pole is situated outdoors with trees and a green fence in the background under a clear blue sky.	 A close-up photograph of the wooden pole showing several metal identification tags. The tags are stamped with the following information: 'P 76656', 'STA. 246-233', and '25 KVA'. There are also two circular metal caps above the first tag.
<p>Item1Gimg1: Overview of pole</p>	<p>Item1Gimg2: Pole ID</p>

 A close-up photograph of a utility pole showing a transformer and various electrical components. The transformer and other parts are not covered with avian protection covers, which is a violation.
<p>Item1IA1img1: No avian protection covers</p>