



December 31, 2024

To: San Diego Gas & Electric  
Lena McMillin  
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8326 Century Park Court, CP32  
San Diego, CA 92123

**SUBJECT: Office of Energy Infrastructure Safety’s Audit of San Diego Gas & Electric’s 2023 Vegetation Management Work**

Pursuant to the requirements of California Public Utilities Code section 8386.3(c)(5)(A), the Office of Energy Infrastructure Safety (Energy Safety) completed its audit of San Diego Gas & Electric’s (SDG&E) 2023 vegetation management work pursuant to its 2023-2025 Wildfire Mitigation Plan. Energy Safety found that SDG&E did not provide information consistent with the completion of the work required for five of the thirteen vegetation management initiatives. SDG&E must submit its Corrective Action Plan response to the 2023 SVM docket<sup>1</sup> in Energy Safety’s e-filing system within 30 days from the issuance of this audit. If you have any questions concerning this audit, please e-mail [Karen.McLaughlin@energysafety.ca.gov](mailto:Karen.McLaughlin@energysafety.ca.gov) and provide a copy to Marisa Salazar at [Marisa.Salazar@energysafety.ca.gov](mailto:Marisa.Salazar@energysafety.ca.gov) and [environmentalsciencedivision@energysafety.ca.gov](mailto:environmentalsciencedivision@energysafety.ca.gov).

Sincerely,

A handwritten signature in cursive script that reads "Sheryl Bilbrey".

Sheryl Bilbrey  
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<sup>1</sup> All documents related to SDG&E’s 2023 SVM audit are available on Energy Safety’s e-filing under the “2023-SVM” docket and available here: (<https://efiling.energysafety.ca.gov/Lists/DocketLog.aspx?doctetnumber=2023-SVM>[DATE])



OFFICE OF ENERGY INFRASTRUCTURE SAFETY  
**2023 SUBSTANTIAL VEGETATION  
MANAGEMENT AUDIT**  
**SAN DIEGO GAS & ELECTRIC**

December 2024

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# EXECUTIVE SUMMARY

The Office of Energy Infrastructure Safety (Energy Safety) completed an audit of San Diego Gas and Electric's (SDG&E) vegetation management commitments from its 2023-2025 Wildfire Mitigation Plan (WMP).<sup>1</sup> The SDG&E 2023-2025 WMP had thirteen vegetation management initiatives in six programmatic areas. Energy Safety found that SDG&E did not provide information consistent with the completion of all work commitments for five of its thirteen vegetation management initiatives.

For each audit finding for which Energy Safety determined SDG&E did not provide information supporting completion of all work commitments in a vegetation management initiative in the WMP, SDG&E must address that deficiency as part of a corrective action plan. SDG&E must title its response "San Diego Gas and Electric 2023 SVM Audit Corrective Action Plan" and submit the response on the 2023 SVM Docket in Energy Safety's E-Filing System within 30 days of receipt of this audit. Requirements for the response are discussed in Section 4 of this document.

Energy Safety is available to meet with SDG&E to discuss the audit findings and provide any clarification necessary for SDG&E to timely respond to Energy Safety's audit.

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<sup>1</sup> [SDG&E's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true) (Rev. #1, October 23, 2023)  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true>).

# 1. OVERVIEW

Pursuant to Public Utilities Code section 8386.3(c)(5), the Office of Energy Infrastructure Safety (Energy Safety) must, on an annual basis, audit the vegetation management work performed by an electrical corporation upon notification that the electrical corporation has completed a substantial portion of the vegetation management requirements in its Wildfire Mitigation Plan (WMP). Specifically, the Vegetation Management and Inspections requirements audited in this document are in Section 8.2 of the WMP. Vegetation Management and Inspections include the following programmatic areas:

- Vegetation inspections
- Vegetation and fuels management
- Vegetation management enterprise system
- Quality assurance / quality control
- Open work orders
- Workforce planning

The WMP identifies the electrical corporation's objectives in each of these programmatic areas as well as the initiatives that will achieve the stated objectives. Initiatives include one or more specific work commitments. These commitments include both quantitative targets (e.g., completion of a specified number of inspections) and verifiable narrative statements (e.g., implementation of personnel training programs). Work commitments for each initiative may include only quantitative targets, both quantitative targets and narrative statements, or only narrative statements. Energy Safety assessed completeness of all relevant targets and statements.

The substantial vegetation management (SVM) audit includes Energy Safety's analysis of the electrical corporation's work products over the audit year and determines if the electric company provided documentation sufficient to determine if all work commitments were completed for each initiative in its WMP. While the WMP lists the initiatives under programmatic headings, Energy Safety assessed work completion at the initiative level.

## 2023 San Diego Gas & Electric (SDG&E) Substantial Vegetation Management Audit

SDG&E submitted its SVM 2023 completion notification on December 15, 2023.<sup>2</sup>

Energy Safety has completed its SVM audit of SDG&E's vegetation management program activities for 2023. As part of the SVM audit process, Energy Safety identified both quantitative targets and verifiable statements from Section 8.2 of the SDG&E 2023-2025 WMP. Energy Safety then compared the WMP vegetation management targets and statements to the work performed by SDG&E in 2023 using Quarterly Data Reports (QDR), non-spatial data tables, and data request responses submitted by SDG&E.

Table 1 of this report includes a list of all vegetation management initiatives and Energy Safety's findings of whether SDG&E completed all required work.

The appendix includes a summary of targets and/or narrative statements, supporting information and analysis, conclusions, and findings for each initiative.

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<sup>2</sup>[SDG&E 2023 Notification of Completion of Substantial Vegetation Management Initiatives](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56076&shareable=true) (December 15, 2023) (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56076&shareable=true>).

## 2. 2023 SVM AUDIT FINDINGS

The SDG&E 2023-2025 WMP had thirteen vegetation management initiatives in six programmatic areas. Energy Safety’s findings regarding completion of work for each initiative are shown in Table 1. Audit findings in bold indicate that SDG&E was unable to provide sufficient documentation demonstrating that all work was completed for that initiative. A detailed analysis of quantitative targets and narrative statements, supporting information, conclusions and findings for each initiative are included in the appendix.

Table 1. SDG&E 2023 SVM Audit Finding Summary

Programmatic Area	Vegetation Management Initiative	Audit Finding
<b>8.2.2. Vegetation Management Inspections</b>	<b>8.2.2.1 Vegetation Management Inspections</b>	<b>Did not complete all work</b>
8.2.3. Vegetation and Fuels Management	8.2.3.1 Pole Clearing	Completed all work
<b>8.2.3. Vegetation and Fuels Management</b>	<b>8.2.3.2 Wood and Slash Management</b>	<b>Did not complete all work</b>
<b>8.2.3. Vegetation and Fuels Management</b>	<b>8.2.3.3 Clearance</b>	<b>Did not complete all work</b>
8.2.3 Vegetation and Fuels Management	8.2.3.4 Fall-In Mitigation	Completed all work
8.2.3. Vegetation and Fuels Management	8.2.3.5 Substation Defensible Space	Completed all work
8.2.3 Vegetation and Fuels Management	8.2.3.6 High-Risk Species	Completed all work
8.2.3 Vegetation and Fuels Management	8.2.3.7 Fire Resilient Right-of-Ways	Completed all work
8.2.3 Vegetation and Fuels Management	8.2.3.8 Emergency Response Vegetation Management	Completed all work

Programmatic Area	Vegetation Management Initiative	Audit Finding
8.2.4 Vegetation Management Enterprise System	8.2.4.1 Vegetation Management Enterprise System	Completed all work
<b>8.2.5 Quality Assurance and Quality Control</b>	<b>8.2.5.1 Quality Assurance and Quality Control</b>	<b>Did not complete all work</b>
<b>8.2.6 Open Work Orders</b>	<b>8.2.6.1 Open Work Orders</b>	<b>Did not complete all work</b>
8.2.7 Workforce Planning	8.2.7 Workforce Planning	Completed all work



### 3. 2023 SVM AUDIT CONCLUSION

Energy Safety reviewed the thirteen vegetation management initiatives in SDG&E's 2023-2025 WMP and found SDG&E performed all work in eight vegetation management initiatives but was unable to provide supporting documentation or information consistent with completion of quantitative targets and/or narrative statements for the remaining five vegetation management initiatives.

For each audit finding for which Energy Safety determined SDG&E did not provide supporting documentation or information consistent with completion of all vegetation management commitments, SDG&E must submit a response per the requirements outlined in Section 4 to Energy Safety within 30 days of receipt of this audit.

This audit is not an assessment of the quality of SDG&E's execution of its vegetation management program.

## 4. SDG&E AUDIT RESPONSE

SDG&E must provide Energy Safety with a response for each initiative in Table 1 with a finding of “did not complete all work” that includes a response addressing the following criteria as described in the Compliance Guidelines<sup>3</sup>:

1. Should SDG&E disagree with an audit finding that all work was not performed per the WMP, SDG&E must provide the basis for that conclusion including detailed supporting documentation and rationale for that response.
2. If SDG&E contends that the intent of the initiative was met because either a large percentage of the work was completed and/or other vegetation management actions taken by SDG&E addressed the wildfire risk at issue, SDG&E must provide specific details and documentation supporting that conclusion.
3. Should SDG&E agree with the audit finding that all work was not performed for a vegetation management initiative, SDG&E must provide the following in a corrective action plan:
  - a. Data and/or supporting documents explaining why a commitment was missed,
  - b. The circumstances or mitigating factors as to why a commitment was missed,
  - c. If SDG&E was aware of the missed commitment during the compliance period, a detailed accounting of any corrective action measures implemented since the end of the compliance period to avoid future missed commitments including long term strategies to reduce or eliminate wildfire risk, and
  - d. Additional actions SDG&E plans to implement to ensure commitments of a similar nature are not missed in the future.
4. The response must be titled “San Diego Gas and Electric’s 2023 SVM Audit Corrective Action Plan YYYYMMDD”.<sup>4</sup>

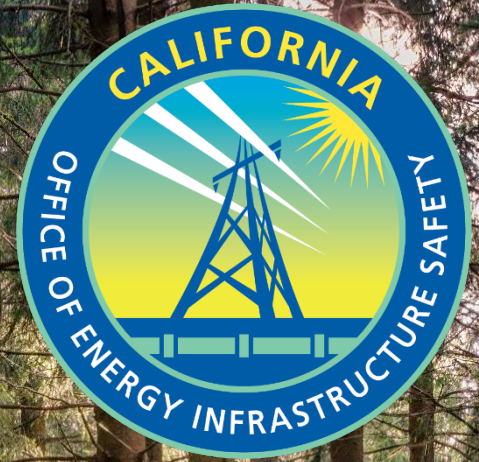
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<sup>3</sup> [Energy Safety Compliance Guidelines \(September 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57320&shareable=true), pgs. 12-13  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57320&shareable=true>)

<sup>4</sup> “YYYYMMDD” represents the date of submission.

**DATA DRIVEN**  
**FORWARD-THINKING**  
**INNOVATIVE**  
**SAFETY FOCUSED**





# APPENDIX

## WORK COMMITMENTS, SUPPORTING INFORMATION AND ANALYSIS, CONCLUSIONS, AND FINDINGS

## APPENDIX SUMMARY

Energy Safety analyzed each of the thirteen vegetation management initiatives listed in San Diego Gas and Electric's (SDG&E) 2023-2025 Wildfire Mitigation Plan (WMP) as part of this audit. Energy Safety identified the vegetation management work commitments, including quantitative targets and narrative statements, relevant to each initiative and compared that to the work performed by SDG&E in 2023. Determination of whether all work was complete for each initiative was based on documentation submitted by SDG&E. For any commitment or statement for which SDG&E was not able to provide supporting documentation or information to support completion, SDG&E must submit a response as part of a corrective action plan per the requirements outlined in Section 4.

## INITIATIVE ANALYSIS

For each initiative in Section 8.2 (Vegetation Management and Inspections) of SDG&E's 2023-2025 WMP, Energy Safety assessed completion of all quantitative targets as well as verifiable, narrative statements. For each target/statement, Energy Safety documents the supporting information provided by SDG&E, Energy Safety's analysis of that information, and Energy Safety's conclusion regarding completion of work described by the target/statement. Energy Safety then provides a finding for each initiative. A finding of "all work completed" is given only if SDG&E has provided sufficient documentation or supporting information demonstrating completion of all targets and/or statements within that initiative. If any target or statement is incomplete or insufficiently documented, the overall finding for the initiative will be "did not complete all work."

## 28.2.2 Vegetation Management Inspections

The purpose of this initiative is to describe the “Inspections of vegetation around and adjacent to electrical facilities and equipment that may be hazardous by growing, blowing, or falling into electrical facilities or equipment”.<sup>5</sup> Inspection activities included Detailed Vegetation Inspections and Off-Cycle Patrol Inspections, which are analyzed in the sections below.

### 8.2.2.1 Detailed Vegetation Inspections

#### Quantitative Target or Commitment, Supporting Information & Analysis, and Conclusion

SDG&E provided the detailed vegetation inspection targets in its 2023-2025 WMP.<sup>6</sup> For ease of comparison, the WMP targets and work completed are summarized below:

Initiative Activity	SDG&E’s 2023 Quantitative Target	Actual Completed in 2023
Detailed Inspection- Tree Units	485,400 tree inspections	516,282 tree inspections
Detailed Inspections- VMA	133 VMA inspections	133 VMA inspections

Supporting Information & Analysis: SDG&E provided an Excel file showing that it conducted detailed inspections on 516,282 tree units in 2023.<sup>7</sup> SDG&E also submitted QDR spatial<sup>8</sup> and non-spatial data tables<sup>9</sup> to Energy Safety indicating that it completed detailed inspections on 514,626 tree units in 2023. While both datasets exceed the target, the QDR spatial and non-spatial data tables showed a discrepancy of 1,656 less detailed inspections of tree units than the information provided by SDG&E in its response to Data Request #260 (DR-260) from Energy Safety. SDG&E attributed this difference to incomplete data submitted to the QDR due to the of the cutoff date required for quarterly data submissions. Energy Safety understands

<sup>5</sup> [Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (December 6, 2022), p. A-24 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

<sup>6</sup> [SDG&E’s 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true) (Rev. #1, October 23, 2023) p. 258 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true). This table was modified for Energy Safety’s data request to include statements and targets relevant to 2023.

<sup>7</sup> Data Request 260, Question 5; attachment: “2023\_SVM\_\_OEIS\_DR260\_Q5.”

<sup>8</sup> SDG&E’s geospatial 2023 quarter 4 Quarterly Data Report (QDR), SDGE Asset Inspection Point, 8.1.3.11.

<sup>9</sup> SDG&E’s Quarterly Data Report (QDR) for Fourth Quarter 2023, submitted on February 12, 2024, Table 1. (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56307&shareable=true)

that the cutoff dates for quarterly data submission may result in submission of incomplete data or data that has not yet undergone quality control checks; however, the Data Guidelines require SDG&E to submit a revision to previously submitted data when it identifies errors or updates by the next quarterly submission date. SDG&E submitted its quarterly data as specified by the Data Guidelines, with the last quarterly submission by February 1, 2024. It then submitted DR-260 on September 20, 2024, therefore could have updated its QDR data submissions during either the May 1 or August 1 quarterly submission.<sup>10</sup>

In this case, the discrepancy does not affect the audit finding and the explanation provided explains the difference. However, it is incumbent upon SDG&E to update its QDR data as so that Energy Safety has accurate for the audit process.

Conclusion: SDG&E provided information consistent with the completion of work identified in this target.

## **Narrative Statements, Supporting Information & Analysis, and Conclusion**

### **Statement 1**

Statement: “During the annually scheduled routine inspection activity, all inventory trees are inspected to determine whether they require pruning for the annual cycle. Information for each inventory tree is recorded within the electronic inventory tree database, PowerWorkz.”<sup>11</sup>

Supporting Information and Analysis: SDG&E provided an Excel file showing that it conducted inspections on 516,282 tree units in 2023.<sup>12</sup> Each inspection included a condition code that indicated whether the tree(s) needed pruning or removal for the annual cycle, Vegetation Management Area (VMA), voltage class (Distribution or Transmission), tree ID, and species. Approximately 96% of the inspections were conducted along Distribution lines while the remaining 4% were conducted along Transmission lines.

SDG&E stated that 490,356 tree units were a part of its active inventory tree population as of January 1, 2023.<sup>13</sup> SDG&E further explained that trees will be added and removed from its tree inventory over the course of the annual cycle through its inspection program, which explains why the total number of trees in the Excel file (516,282 tree units) exceeded the inventory at the start of the annual cycle because it accounts for the updates to the database over the year. Thus, SDG&E demonstrated that it is appropriately updating its tree inventory and

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<sup>10</sup> [Energy Safety's Data Guidelines](#) (version 3.0, December 14, 2022), p. 6  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53314&shareable=true>).

<sup>11</sup> [SDG&E's 2023-2025 WMP](#) (Rev. #1, October 23, 2023) p. 261  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true>).

<sup>12</sup> Data Request 260, Question 3; attachment: “2023\_SMV\_OEIS\_DR260\_Q3.xlsx.”

<sup>13</sup> Data Request 260, Question 1; attachment: “SDGE Response Energy Safety-DR-260.pdf.”

performed work consistent with the statement regarding inspection of inventory trees for pruning.

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

### Statement 2

Statement: “Ten to twelve VMAs are pre-inspected each month within the Master Schedule such that all 133 VMAs are completed each year. During the detailed inspection activity, all trees within and adjacent to the distribution and transmission right-of-way are assessed to determine whether tree trimming, or removal is required for the annual cycle.”<sup>14</sup>

Supporting Information and Analysis: SDG&E provided its Master Schedule of the VMA’s pre-inspection schedule in 2023 as well as an Excel file documenting all pre-inspections completed in 2023 (including dates of inspection, VMA identification, location, conditions identified, and mitigation work).<sup>15</sup> Based on the Master Schedule, SDG&E inspected all 133 VMAs in 2023 by conducting pre-inspections for 11 to 12 VMAs each month. Similarly, the secondary file confirms that SDG&E conducted pre-inspections within all 133 VMAs.

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

### Statement 3

Statement: “Species-specific risk-based vegetation inspections are performed annually including Century Plant and Bamboo. These inspection activities are performed throughout the service territory.”<sup>16</sup>

Supporting Information & Analysis: SDG&E provided an Excel file listing the species-specific risk-based inspections conducted in 2023. The file excludes any VMA routine-scheduled inspection activities. SDG&E explained tree records are not updated during species-specific patrols if they coincide with a VMA's routine inspection.<sup>17</sup> SDG&E completed species-specific inspections on 73,483 tree units, of which approximately 87% and 13% of the species identified were Century Plant and Bamboo (including brush Bamboo), respectively. The Excel

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<sup>14</sup> [SDG&E's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true) (Rev. #1, October 23, 2023) p. 262  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true>).

<sup>15</sup> Data Request 260, Question 4; attachments: “VM\_Master\_Schedule.xlsx” and “2023\_SVM\_\_OEIS\_DR260\_Q4.xlsx.”

<sup>16</sup> [SDG&E's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true) (Rev. #1, October 23, 2023) p. 265  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true>).

<sup>17</sup> Data Request 260, Question 6; attachment: “2023\_SVM\_\_OEIS\_DR260\_Q6.xlsx.”



file also included conditions identified, date of mitigation work, location, HFTD, Voltage Class (Transmission or Distribution), and VMA.

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

#### Statement 4

Statement: “Following the annual Master Schedule, routine tree trimming activities occur 2 to 4 months after the inspection activity for a given VMA. During the routine inspection activity, if a tree is found to be near the power lines or exhibits an elevated hazardous threat, the tree will be treated as a “Memo” and issued to the tree trim contractor to work on a priority basis.”<sup>18</sup>

Supporting Information & Analysis: SDG&E provided an Excel file demonstrating that routine trimming activities were completed within four months of tree pre-inspections.<sup>19</sup> In addition to the dates of both the pre-inspection and trimming activities, this file included tree identification, species, number of tree units, conditions identified, and HFTD classification. In cases where Memos were identified, trimming activities occurred shortly after the initial inspection, usually no longer than two months, indicating that SDG&E prioritized trimming of Memo trees.

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

### 8.2.2.2 Off-Cycle Patrol Inspections

#### Quantitative Target or Commitment, Supporting Information & Analysis, and Conclusion

SDG&E provided the following off-cycle patrol inspections targets in its 2023-2025 WMP.<sup>20</sup> For ease of comparison, the WMP target and work complete is summarized below:

Initiative Activity	SDG&E’s 2023 Quantitative Target	Actual Completed in 2023
Off-Cycle Patrol	106 VMAs	106 VMAs

<sup>18</sup> [SDG&E’s 2023-2025 WMP](#) (Rev. #1, October 23, 2023) p. 265

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true>).

<sup>19</sup> Data Request 260, Question 8; attachment: “2023\_SVM\_\_OEIS\_DR260\_Q8.xlsx.”

<sup>20</sup> [SDG&E’s 2023-2025 WMP](#) (Rev. #1, October 23, 2023) pp. 145-146

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true>). This table was modified for Energy Safety’s data request to include statements and targets relevant to 2023.

Off-Cycle HFTD Patrols	Annual patrols; in HFTD twice-annual	Achieved
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Supporting Information & Analysis: SDG&E provided an Excel file listing the off-cycle patrol inspections conducted in 2023.<sup>21</sup> Based on this file, SDG&E completed off-cycle patrol inspections on 261,510 tree units. SDG&E’s WMP states that of the 133 vegetation management areas (VMAs) in the service territory, 106 are either partially or wholly within the HFTD and that approximately 240,000 of the 485,000 inventory trees are located within the HFTD.<sup>22</sup> The inspections documented in the provided Excel file occurred within the 106 VMAs in Tier 2 and 3 HFTD areas and further confirmed in the non-spatial QDR tables that SDG&E submitted in 2023.<sup>23</sup> The off-cycle patrol inspections serve as the second (twice-annual) inspection of all trees in the HFTD that have already received detailed routine inspections.<sup>24</sup>

Conclusion: SDG&E provided information consistent with the completion of work identified in this target.

## Narrative Statements, Supporting Information & Analysis, and Conclusion

### Statement 5

Statement: “For targeted species patrols, a second, annual inspection is performed for every inventory Century plant within the service territory.”<sup>25</sup>

Supporting Information & Analysis: SDG&E provided an Excel file listing the 63,616 Century plants identified during targeted species patrols in 2023.<sup>26</sup> Based on the unique tree ID, 68% of Century plants were inspected at least twice in 2023, while the remaining 32% of Century plants were inspected once. SDG&E explained that Century plant records may not be updated during targeted species patrols if they coincide with a VMA’s annual routine inspection.<sup>27</sup> While it is possible that the 32% of inventory Century plants inspected once in 2023 were inspected again during a VMA’s annual routine, SDG&E was unable to provide supporting documentation to confirm the work was completed. Energy Safety understands that the targeted species were inspected during routine patrols; however, the failure to record these

<sup>21</sup> Data Request 260, Question 5; attachment: “2023\_SMV\_OEIS\_DR260.xlsx.”

<sup>22</sup> [SDG&E’s 2023-2025 WMP](#) (Rev. #1, October 23, 2023) p. 266  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true>).

<sup>23</sup> SDG&E’s Quarterly Data Report (QDR) for Fourth Quarter 2023, submitted on February 12, 2024, Table 1.  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56307&shareable=true>)

<sup>24</sup> Data Request 260, Question 2; attachment: “Inspection\_Activities.xlsx.”

<sup>25</sup> [SDG&E’s 2023-2025 WMP](#) (Rev. #1, October 23, 2023) p. 267  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true>).

<sup>26</sup> Data Request 260, Question 10; attachment: “2023\_SVM\_\_OEIS\_DR260\_Q10.xlsx.”

<sup>27</sup> Data Request 260, Question 10; attachment: “SDGE Response Energy Safety-DR-260.pdf.”

species during those inspections prevented Energy Safety from verifying the completion of the work.

Conclusion: SDG&E did not provide information consistent with the completion of work identified in this statement.

#### Statement 6

Statement: “The targeted species patrols for Bamboo are scheduled in the summer and fall each year. During these activities, every Bamboo in the Vegetation Management tree inventory database is inspected for growth. These patrols are in addition to the routine detailed inspection that occurs within each VMA’s scheduled month. Therefore, each inventory Bamboo is inspected three times each year.”<sup>28</sup>

Supporting Information & Analysis: The statement indicates a commitment to conduct targeted species patrols for Bamboo twice per year with a possible third inspection during routine VMA inspections. SDG&E provided an Excel file listing the targeted species patrols for Bamboo conducted every month of 2023.<sup>29</sup> Based on the unique tree ID, SDG&E conducted at least two inspections of 37% of its inventory Bamboo plants. For the 63% of Bamboo plants that were only inspected once instead of twice annually, SDG&E explained that tree records are not updated during Bamboo patrols if they coincide with a VMA’s annual routine inspection.<sup>30</sup> Additionally, SDG&E entered new contracts with vendors beginning in mid-year [2023], which delayed some vegetation management activities. Further, SDG&E explained that the Bamboo patrol normally conducted in the summer did not occur in 2023 so as not to impact the routine scheduled inspections throughout the year. While SDG&E continued the Memo (priority) process during VMA inspections throughout the summer, Energy Safety cannot verify that the targeted species inspections for Bamboo were conducted during the compliance period.<sup>31</sup>

Conclusion: SDG&E did not provide information consistent with the completion of work identified in this statement.

### Finding- 8.2.2 Vegetation Management Inspections

SDG&E provided information consistent with the completion of work identified in 8.2.2.1 Detailed Vegetation Inspections but did not provide information consistent with the completion of work identified 8.2.2.2 Off-Cycle Patrol Inspections. Therefore, Energy Safety

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<sup>28</sup> SDG&E’s 2023-2025 WMP (Rev. #1, October 23, 2023) p. 267

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true>).

<sup>29</sup> Data Request 260, Question 11; attachment: “2023\_SVM\_\_OEIS\_DR260\_Q11.xlsx.”

<sup>30</sup> Data Request 260, Question 11; attachment: “SDGE Response Energy Safety-DR-260.pdf.”

<sup>31</sup> Data Request 260, Question 11; attachment: “SDGE Response Energy Safety-DR-260.pdf.”

concludes that SDG&E did not complete all work related to Initiative 8.2.2 vegetation management inspections.

### 8.2.3.1 Vegetation and Fuels Management- Pole Clearing

The purpose of this initiative is to describe the “Plan and execution of vegetation removal around poles per Public Resources Code section 4292 and outside the requirements of Public Resources Code section 4292 (e.g., pole clearing performed outside of the State Responsibility Area)”.<sup>32</sup>

#### Quantitative Target or Commitment, Supporting Information & Analysis, and Conclusion

SDG&E provided the following Vegetation and Fuels Management Pole Clearing target in its 2023-2025 WMP.<sup>33</sup> For ease of comparison, the WMP target and work complete is summarized below:

Initiative Activity	SDG&E’s 2023 Quantitative Target	Actual Completed in 2023
Pole Clearing	33,010 poles	35,251 poles

Supporting Information & Analysis: Prior to this audit, SDG&E submitted spatial QDR and non-spatial table data showing that it cleared 35,258 poles in 2023 to Energy Safety.<sup>34</sup> For exact totals, Energy Safety requested an Excel file for this audit to verify SDG&E met its Pole Clearing target. The Excel file showed that SDG&E cleared 35,251 poles in 2023.<sup>35</sup> The file also detailed whether the poles were in the Local Responsibility Area (LRA) or State Responsibility Area (SRA), the method of clearing (e.g., mechanical, or chemical pole brush), and the date the work was completed. SDG&E attributed these differing totals to accidental double-counts in the QDR spatial data, updates to pole brush records, and corrections of pole IDs. SDG&E also explained that the pole brushing database includes records that are corrected and/or updated when appropriate. Energy Safety understands that inaccuracies may occur in quarterly data submission due to the cut off dates; however, the Data Guidelines require energy corporations to submit a revision to previously submitted data when errors are

<sup>32</sup> [Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (December 6, 2022), p. A-24 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

<sup>33</sup> [SDG&E’s 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true) (Rev. #1, October 23, 2023) pp. 257-258 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true). This table was modified for Energy Safety’s data request to include statements and targets relevant to 2023.

<sup>34</sup> SDG&E’s Quarterly Data Report (QDR) for Fourth Quarter 2023, submitted on February 12, 2024, Table 1. (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56307&shareable=true).

<sup>35</sup> Data Request 260, Question 13; attachment: “2023\_SVM\_\_OEIS\_DR260\_Q13.xlsx.”

identified by the next quarterly submission date.<sup>36</sup> SDG&E submitted its quarterly data as specified by the Data Guidelines, with the last quarterly submission by February 1, 2024. It then submitted DR-260 on September 20, 2024, therefore could have updated its QDR data submissions during either the May 1 or August 1 quarterly submission.<sup>37</sup>

In this case, the discrepancy does not affect the audit finding and the explanation provided explains the difference. However, it is incumbent upon SDG&E to update its QDR data as required so that Energy Safety has accurate data for the audit process.

Conclusion: SDG&E provided information consistent with the completion of work identified in this target.

## Narrative Statements, Supporting Information & Analysis, and Conclusion

### Statement 7

Statement: “On poles where environmentally safe and with customer consent, contractors will apply an Environmental Protection Agency (EPA)-approved herbicide to suppress seed generation, limit vegetation re-growth, and reduce overall maintenance costs. The chemical application is typically done just before the rainy season (fall and winter), so the chemical is activated and effective.”<sup>38</sup>

Supporting Information & Analysis: SDG&E provided an Excel file indicating that 9,677 poles received pole clearing activities involving herbicide in 2023.<sup>39</sup> The poles were identified via their ID and included a location (LRA or SRA), activity date, and work order ID. Approximately 86% of the poles had “Chemical Warranty Applied” while the remaining 14% of poles had “Herbicide applied.” SDG&E explained that “Chemical Warranty Applied” refers to poles that have undergone herbicide treatment and have been cleared of vegetation a second time during the annual cycle while “Herbicide Applied” applies to poles where herbicide and mechanical vegetation management occurred.<sup>40</sup>

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

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<sup>36</sup> [Energy Safety’s Data Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53314&shareable=true) (version 3.0, December 14, 2022), p. 6 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53314&shareable=true).

<sup>37</sup> [Energy Safety’s Data Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53314&shareable=true) (version 3.0, December 14, 2022), p. 6 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53314&shareable=true).

<sup>38</sup> [SDG&E’s 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true) (Rev. #1, October 23, 2023) p. 273 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true).

<sup>39</sup> Data Request 260, Question 14; attachment: “2023\_SVM\_\_OEIS\_DR260\_Q14.xlsx.”

<sup>40</sup> Data Request 260, Question 14; attachment: “SDGE Response Energy Safety-DR-260.pdf.”

**Statement 8**

Statement: “An environmental review is performed in advance of any new subject pole requiring brushing to assess impacts to protected species and habitat.”<sup>41</sup>

Supporting Information & Analysis: SDG&E has stated that planning and execution of pole brushing activities requires an environmental review for each newly identified pole. SDG&E provided an environmental review document, dated August 2023, for 193 poles that had not been previously brushed. The environmental review included a project description, compliance checklist of environmental requirements, and identified possible natural and cultural resource protection constraints.<sup>42</sup> Additionally, SDG&E supplied an Excel file that documented the environmental release date, constraints (if applicable), and each pole’s subsequent brush date (all of which were after environmental review), for the 193 new poles identified within the HFTD in 2023.<sup>43</sup> Energy Safety has only verified that this work was completed for purposes of the audit and is not assessing the effectiveness of the environmental review process.

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

**Finding- 8.2.3.1 Pole Clearing**

SDG&E provided information consistent with the completion of work identified in initiative 8.2.3.1 Pole Clearing.

## 8.2.3.2 Vegetation and Fuels Management-Wood and Slash Management

The purpose of this initiative is to take actions “to manage all downed wood and “slash” generated from vegetation management activities”.<sup>44</sup>

**Quantitative Target or Commitment, Supporting Information & Analysis, and Conclusion**

SDG&E provided the following Vegetation and Fuels Management Wood and Slash

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<sup>41</sup> [SDG&E’s 2023-2025 WMP](#) (Rev. #1, October 23, 2023) p. 273

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true>).

<sup>42</sup> Data Request 260, Question 15; attachment: “2023\_SVM\_\_OEIS\_DR260\_Q15\_Redacted.pdf.”

<sup>43</sup> Data Request 260, Question 15; attachment: “New\_Pole\_Enviro\_Review.xlsx.”

<sup>44</sup> [Energy Safety’s 2023-2025 Wildfire Mitigation Plan Technical Guidelines](#) (December 6, 2022), p. A-24 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

Management target in its 2023-2025 WMP.<sup>45</sup> For ease of comparison, the WMP target and work complete is summarized below:

Initiative Activity	SDG&E's 2023 Quantitative Target	Actual Completed in 2023
Fuels Management	500 poles	514 poles

Supporting Information & Analysis: SDG&E provided an Excel file,<sup>46</sup> spatial QDR,<sup>47</sup> and non-spatial data tables,<sup>48</sup> which confirmed that SDG&E exceeded its Fuels Management target in treating 514 poles in 2023. The Excel file included the pole ID as well as the type of fuels management treatment activity (maintenance or treatment), and activity date.

Conclusion: SDG&E provided information consistent with the completion of work identified in this target.

## Narrative Statements, Supporting Information & Analysis, and Conclusion

### Statement 9

Statement: “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. Large wood debris (generally greater than 6 inches diameter) is cut into manageable lengths and left on site. Where requested, all wood debris and wood chips may be left on a landowner’s property for customer utilization.”<sup>49</sup>

Supporting Information & Analysis: SDG&E provided an Excel file of all work orders for all tree trimming and removals activities completed in 2023 as requested by Energy Safety. The file, which included the work order numbers and descriptions such as ‘Memo’ or ‘reliability’, showed that SDG&E completed 3,804 work orders in 2023.<sup>50</sup> While the file did not include additional information, such as confirmation that vegetation debris was removed, SDG&E explained that it removes all vegetation debris on customer property the same day work is

<sup>45</sup> [SDG&E's 2023-2025 WMP](#) (Rev. #1, October 23, 2023) p. 258 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true>). This table was modified for Energy Safety’s data request to include statements and targets relevant to 2023.

<sup>46</sup> Data Request 260, Question 12; attachment: “2023\_SVM\_\_OEIS\_DR260\_Q12.xlsx.”

<sup>47</sup> SDG&E’s geospatial 2023 quarter 4 Quarterly Data Report (QDR), SDGE Vegetation Management Project Point, 8.2.3.

<sup>48</sup> SDG&E’s Quarterly Data Report (QDR) for Fourth Quarter 2023, submitted on February 12, 2024, Table 1. (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56307&shareable=true>).

<sup>49</sup> [SDG&E's 2023-2025 WMP](#) (Rev. #1, October 23, 2023) p. 274 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true>).

<sup>50</sup> Data Request 260, Question 16; attachment: “2023\_SMV\_OEIS\_DR260\_Q16.xlsx.”

performed, per its standard operating procedures.<sup>51</sup> Additionally, SDG&E included a list of 18 landowner properties where wood debris and/or chips were left on site per the customers' requests in 2023.<sup>52</sup> Therefore, Energy Safety can verify that the work orders were completed, but the work orders do not document whether SDG&E always adhered to its standard operating procedures regarding wood and slash removal. Failure to remove wood and slash debris following tree trimming and removal activities would contribute to unnecessary risk on the system. Therefore, documenting those activities is necessary to demonstrate that SDG&E met the objective of the WMP. Because SDG&E could not produce records showing that debris was removed, Energy Safety could not confirm that the work was completed nor confirm that SDG&E met the objective of the WMP.

Conclusion: SDG&E did not provide information consistent with the completion of work identified in this statement.

#### Statement 10

Statement: "All debris associated with tree operations is removed from the channel and banks of watercourses (rivers, streams, lakes, wetlands, etc.) in accordance with environmental regulations such as California Department of Fish and Wildlife section 1600 (Fish and Game Code); California Department of Fish and Wildlife Lake and Streambed Alteration Program; and California Forest Best Practice Rules."<sup>53</sup>

Supporting Information & Analysis: SDG&E provided an Excel file detailing 2,290 instances of wood and slash debris removal from watercourses adjacent to both Distribution and Transmission lines in 2023.<sup>54</sup> The debris, resulting from SDG&E's pole brushing operations, was primarily concentrated in the HFTD, accounting for 70% of all instances. The file included inspection dates, identified conditions, work completion dates, HFTD classifications, VMAs, and voltage class (Distribution and Transmission) designations. Energy Safety's analysis only included an assessment of completion of the work described in the WMP, not compliance with the Fish and Game Code, Lake and Streambed Alteration Program, or California Forest Best Practice Rules.

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

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<sup>51</sup> Data Request 260, Question 16; attachment: "SDGE Response Energy Safety-DR-260.pdf."

<sup>52</sup> Data Request 260, Question 16; attachment: "2023\_SMV\_OEIS\_DR260\_Q16\_Redacted.pdf."

<sup>53</sup> [SDG&E's 2023-2025 WMP](#) (Rev. #1, October 23, 2023) p. 274

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true>).

<sup>54</sup> Data Request 260, Question 17; attachment: "2023\_SVM\_\_OEIS\_DR260\_Q17.xlsx."



**Statement 11**

Statement: “As part of its larger sustainability initiative, SDG&E continues to increase the amount of its wood and slash material that is diverted to a recycling facility. Currently, approximately 55 percent of total wood debris is diverted to a recycling facility to be rendered into composting or other environmentally sustainable materials.”<sup>55</sup>

Supporting Information & Analysis: SDG&E provided the total wood debris tonnage generated from tree trimming and removal operations and delivered to landfill and recycling vendors in 2023.<sup>56</sup> Based on this document, of the 10,703 total tons of wood and slash material generated, SDG&E distributed approximately 38% and 62% to landfill vendors and recycling vendors, respectively. SDG&E also included invoices from the four respective recycling vendors documenting the delivery dates and tonnage they received from SDG&E monthly.<sup>57</sup> Thus, SDG&E exceeded its sustainability initiative target of 55% by diverting approximately 62% of its total wood and slash material to recycling facilities in 2023.

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

**Finding- 8.2.3.2 Wood and Slash Management**

SDG&E was unable to provide documentation to support the statement that wood and slash debris resulting from tree trimming or removal activities was removed on the same day that work was completed, therefore SDG&E did not provide information consistent with the completion of work identified in initiative 8.2.3.2 Wood and Slash Management.

**8.2.3.3 Vegetation and Fuels Management- Clearance**

The purpose of this initiative is to take actions “after inspection to ensure that vegetation does not encroach upon electrical equipment and facilities, such as tree trimming”.<sup>58</sup>

**Quantitative Target or Commitment, Supporting Information & Analysis, and Conclusion**

SDG&E provided the following Vegetation and Fuels Management Clearance target in its 2023-

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<sup>55</sup> [SDG&E's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true) (Rev. #1, October 23, 2023) p. 274

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true>).

<sup>56</sup> Data Request 260, Question 18; attachment: “2023 Green Waste Tonnage.pdf.”

<sup>57</sup> Data Request 260, Question 18; attachment: “SVM Data Request OEIS-SDGE-260\_Q18\_REDACTED.pdf.”

<sup>58</sup> [Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (December 6, 2022), p. A-24  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

2025 WMP.<sup>59</sup> For ease of comparison, the WMP target and work complete is summarized below:

Initiative Activity	SDG&E's 2023 Quantitative Target	Actual Completed in 2023
Clearance	11,200 tree units	8,855 tree units

Supporting Information & Analysis: SDG&E provided an Excel file indicating that it completed clearance work on 8,855 tree units in 2023.<sup>60</sup> Energy Safety determined this number by only including work completion dates and filtering out the “N/A” and blank line items in the ‘Activity Date’, ‘Condition Code’, and ‘Work Order ID’ columns in the spreadsheet. If the “N/A” and blank line items are included with the 2023 dates, the Excel file SDG&E provided shows that SDG&E completed clearance on 13,452 tree units, thus exceeding its target. However, because Energy Safety cannot verify that the “N/A” and blank line items were completed in 2023, they were not included in the analysis.

SDG&E’s spatial QDR and non-spatial data tables submitted in 2023 indicated a total of 13,419 tree units received clearance work.<sup>61</sup> SDG&E did not explain the discrepancies between the Excel file, which indicates that SDG&E did not perform all the work, and the QDR and non-spatial data tables, which show that it exceeded the target. As a result, Energy Safety cannot conclusively state that SDG&E completed all work in this initiative.

Conclusion: SDG&E did not provide information consistent with the completion of work identified for this target.

## Narrative Statements, Supporting Information & Analysis, and Conclusion

### Statement 12

Statement: “Each year, an average of 30 percent of inventory trees within the HFTD are trimmed or removed and approximately 5 percent receive enhanced trimming or removal beyond the minimum 12-foot clearance.”<sup>62</sup>

<sup>59</sup> [SDG&E's 2023-2025 WMP](#) (Rev. #1, October 23, 2023) pp. 257-258

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true>). This table was modified for Energy Safety’s data request to include statements and targets relevant to 2023.

<sup>60</sup> Data Request 260, Question 19; attachment: “2023\_SMV\_OEIS\_DR260\_Q19.xlsx.”

<sup>61</sup> SDG&E’s Quarterly Data Report (QDR) for Fourth Quarter 2023, submitted on February 12, 2024, Table 1. (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56307&shareable=true>)

<sup>62</sup> [SDG&E's 2023-2025 WMP](#) (Rev. #1, October 23, 2023) p. 259

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true>).

Supporting Information and Analysis: SDG&E provided an Excel file showing that SDG&E trimmed and/or removed 87,055 trees of the total 249,063 trees in the HFTD in 2023, which accounted for approximately 35% of the total HFTD inventory trees.<sup>63</sup> Of those treated, 15% received enhanced trimming. Each record included a tree ID, species, line clearance distance, height, VMA, and a condition code specifying the reason for the intervention. Thus, SDG&E performed a quantity of work consistent with their statements about annual trimming and tree removal and enhanced trimming.

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

### **Finding- 8.2.3.3 Clearance**

SDG&E did not provide information consistent with the completion of all work identified in initiative 8.2.3.3 Clearance.

## **8.2.3.4 Vegetation and Fuels Management- Fall-in Mitigation**

The purpose of this initiative is to take actions “to identify and remove or otherwise remediate trees that pose a high risk of failure or fracture that could potentially strike electrical equipment.”<sup>64</sup>

### **Narrative Statements, Supporting Information & Analysis, and Conclusion**

#### **Statement 13**

Statement: “During the off-cycle HFTD patrol all trees within the strike zone of the secondary, distribution, and transmission lines receive a Level 2 hazard evaluation. Trees tall enough to strike overhead electric lines are assessed for trimming or removal and include identification of dead, dying, and diseased trees, live trees with a structural defect, and conditions such as wind sway and line sag.”<sup>65</sup>

Supporting Information & Analysis: SDG&E provided an Excel file, detailing 416 strike trees identified during the off-cycle HFTD patrol in 2023. These trees, all exceeding 40 feet in height, were near secondary, distribution, and transmission lines. Each strike tree included a Level 2 hazard evaluation, detailing its condition, work completion date, location, HFTD class, and

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<sup>63</sup> Data Request 260, Question 1; attachment: “2023\_SMV\_OEIS\_DR260\_Q1.xlsx.”

<sup>64</sup> [Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (December 6, 2022), p. A-24 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

<sup>65</sup> [SDG&E's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true) (Rev. #1, October 23, 2023) p. 266 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true).

VMA. All strike trees were categorized as 'Dead or Dying' or 'Reliability Pruning,' and mitigation work was initiated an average of 46 days following inspection.<sup>66</sup>

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

### **Finding- 8.2.3.4 Fall-in Mitigation**

SDG&E provided information consistent with the completion of work identified in initiative 8.2.3.4 Fall-in Mitigation.

## **8.2.3.5 Vegetation and Fuels Management- Substation Defensible Space**

The purpose of this initiative is to take actions “to reduce ignition probability and wildfire consequence due to contact with substation equipment”.<sup>67</sup>

### **Quantitative Target or Commitment, Supporting Information & Analysis, and Conclusion**

SDG&E provided the following Substation Patrol Inspections target in its 2023-2025 WMP. For ease of comparison, the WMP target and work complete is summarized below:

<b>Initiative Activity</b>	<b>SDG&amp;E's 2023 Quantitative Target</b>	<b>Actual Completed in 2023</b>
Substation Patrol Inspections	384 inspections	396 inspections

Supporting Information & Analysis: SDG&E provided an Excel file listing all substation inspections completed in 2023. The file, which included the facility name and frequency of inspection for each subsequent substation, showed that SDG&E performed a total of 396 ground inspections on 47 different substations in HFTD in 2023.<sup>68</sup> These 47 substations represent 80% of SDG&E's substations located in HFTD. Additionally, SDG&E provided spatial

<sup>66</sup> Data Request 260, Question 9; attachment: “2023\_SVM\_\_OEIS\_DR260\_Q9.xlsx.”

<sup>67</sup> [Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (December 6, 2022), p. A-25 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

<sup>68</sup> Data Request 260, Question 2; attachment: “Substation Patrol Inspections.xlsx.”

QDR data<sup>69</sup> and non-spatial data tables showing that SDG&E completed 396 total substation inspections in 2023.<sup>70</sup> Thus, SDG&E exceeded its Substation Patrol Inspection target in 2023.

Conclusion: SDG&E provided information consistent with the completion of work identified in this target.

### **Finding- 8.2.3.5 Substation Defensible Space**

SDG&E provided information consistent with the completion of work identified in initiative 8.2.3.5 Substation Defensible Space.

## **8.2.3.6 Vegetation and Fuels Management-High-Risk Species**

The purpose of this initiative is to take actions “to reduce the ignition probability and wildfire consequence attributable to high-risk species of vegetation”.<sup>71</sup>

### **Narrative Statements, Supporting Information & Analysis, and Conclusion**

#### **Statement 14**

Statement: “As part of its tree removal program and its “Right Tree, Right Place” initiative, and for safety and reliability, SDG&E continues to offer customers the incentive to remove incompatible trees growing near power lines and continues to provide replacement trees compatible to plant near power lines.”<sup>72</sup>

Supporting Information & Analysis: SDG&E provided an Excel file documenting incompatible trees that it removed, and the subsequent trees provided to customers as replacements in 2023.<sup>73</sup> In total, SDG&E removed 242 incompatible trees growing near power lines at 111 different residences in 2023, of which 181 trees were considered high risk. Additionally, SDG&E provided 1,170 replacement trees to customers in 2023.

SDG&E also provided a Tree Removal Authorization card, which documented a customer’s authorization of tree removal performed by SDG&E contractors in May 2023.<sup>74</sup> SDG&E included a link to its Tree Safety webpage as well, which provides customers guidance about

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<sup>69</sup> SDG&E’s geospatial 2023 quarter 4 Quarterly Data Report (QDR), SDGE Asset Inspection Point, 8.1.3.11.

<sup>70</sup> SDG&E’s Quarterly Data Report (QDR) for Fourth Quarter 2023, submitted on February 12, 2024, Table 1. (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56307&shareable=true>).

<sup>71</sup> [Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines](#) (December 6, 2022), p. A-25 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

<sup>72</sup> [SDG&E’s 2023-2025 WMP](#) (Rev. #1, October 23, 2023) p. 278

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true>).

<sup>73</sup> Data Request 260, Question 20; attachment: “2023\_SMV\_OEIS\_DR260\_Q20\_REDACTED.xlsx.”

<sup>74</sup> Data Request 260, Question 20; attachment: “2023\_SMV\_OEIS\_DR260\_Q20\_REDACTED.pdf.”

safe vegetation management practices, particularly as it relates to planting the right tree in the right place and clear of electric lines.<sup>75</sup>

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

#### Statement 15

Statement: “The Community Tree Rebate Program will target underserved communities to promote the planting of trees where climate equity is compromised. The program will offer each applicant a rebate on the purchase of up to 5 trees, ranging from 1 to 15 gallons.”<sup>76</sup>

Supporting Information & Analysis: SDG&E provided an Excel file documenting applicants who participated in SDG&E’s Community Tree Rebate Program in 2023.<sup>77</sup> Based on this file, SDG&E provided 1,647 participating customers with rebates for 4,144 trees (which were 1, 5, or 15 gallons.)

SDG&E also included a supplemental document outlining the criteria used in 2023 to determine customers’ eligibility for participation in the Community Tree Rebate Program.<sup>78</sup> SDG&E identified eligible customers based on their zip codes (including those living in the HFTD) and equity scores. SDG&E measured customers’ equity scores based on various data sets, including but not limited to, the Healthy Places Index and CalEnviroScreen 4.0. SDG&E promoted the program to develop customer awareness and encourage program participation from March to June 2023 via email campaigns and paid social media posts.

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

### Finding- 8.2.3.6 High Risk Species

SDG&E provided information consistent with the completion of work identified in initiative 8.2.3.6 High Risk Species.

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<sup>75</sup> Data Request 260, Question 20. “Plant the Right Tree in the Right Place.” *Tree Safety | San Diego Gas & Electric*, <https://www.sdge.com/safety/tree-planting-guide>.

<sup>76</sup> *SDG&E’s 2023-2025 WMP* (Rev. #1, October 23, 2023) p. 278

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true>).

<sup>77</sup> Data Request 260, Question 21; attachment: “2023\_SMV\_OEIS\_DR260\_Q21\_REDACTED.xlsx.”

<sup>78</sup> Data Request 260, Question 21; attachment: “2023\_SMV\_OEIS\_DR260\_Q21.pdf.”

## 8.2.3.7 Vegetation and Fuels Management- Fire-Resilient Right-of-Ways

The purpose of this initiative is to take actions “to promote vegetation communications that are sustainable, fire-resilient, and compatible with the use of the land as an electrical corporation right-of-way”.<sup>79</sup>

### Narrative Statements, Supporting Information & Analysis, and Conclusion

#### Statement 16

**Statement:** “Vegetation Abatement activity was implemented to maintain SDG&E-owned parcels in a fire-safe manner as required by various municipal compliance ordinances, Fire Marshal directives, and community safety expectations. Typically, the same properties are abated annually or on a frequency based on vegetation growth. Depending on conditions such as plant species and rainfall frequency, inspection activities may occur monthly or weekly and may change depending on the season.”<sup>80</sup>

**Supporting Information & Analysis:** SDG&E provided its Transmission Corridor Abatement schedule, which included completion dates and total acres cleared along each Transmission corridor in 2023.<sup>81</sup> Based on this schedule, SDG&E’s third-party vendor conducted mechanical and goat abatement activities across five Transmission corridors, clearing 1,044 total acres in 2023. SDG&E also provided examples of the vendor’s Daily Monitoring Reports based on the goat abatement activities conducted in the Chula Vista, Clairemont, Escondido, Mission, and Oceanside Transmission corridors, respectively.<sup>82</sup> These reports included descriptions of the project, weather, and site details (i.e., if wildlife was observed in the area), as well as images of the site before and after the abatement activity was conducted. Energy Safety’s analysis only included an assessment of completion of the work described in the WMP, not compliance with municipal compliance ordinances, Fire Marshal directives, or community safety expectations.

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<sup>79</sup> [Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (December 6, 2022), p. A-25 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

<sup>80</sup> [SDG&E's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true) (Rev. #1, October 23, 2023) p. 278

(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true).

<sup>81</sup> Data Request 260, Question 22; attachment: “Transmission Corridor Abatement Schedule 2023.xlsx.”

<sup>82</sup> Data Request 260, Question 22; attachments: “2023\_SMV\_OEIS\_DR260\_Q22\_Chula Vista\_Redacted.pdf,”

“2023\_SMV\_OEIS\_DR260\_Q22\_Clairemont\_Redacted.pdf,”

“2023\_SMV\_OEIS\_DR260\_Q22\_Escondido\_Redacted.pdf,”

“2023\_SMV\_OEIS\_DR260\_Q22\_Mission\_Redacted.pdf,” and

“2023\_SMV\_OEIS\_DR260\_Q22\_Oceanside\_Redacted.pdf.”

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

### **Finding- 8.2.3.7 Fire-Resilient Right-of-Way**

SDG&E provided information consistent with the completion of work identified in initiative 8.2.3.7 Fire-Resilient Right-of-Way.

## **8.2.3.8 Vegetation and Fuels Management- Emergency Response Vegetation Management**

The purpose of this initiative is the “planning and execution of vegetation activities in response to emergency situations including weather conditions that indicate an elevated fire threat and post-wildfire service restoration”.<sup>83</sup>

### **Narrative Statements, Supporting Information & Analysis, and Conclusion**

#### **Statement 17**

Statement: “After any fire event of significant size Vegetation Management conducts a hazard tree assessment within the fire perimeter to identify dead, burned, and structurally defective trees that may pose a future threat to the overhead conductors or that may be required to facilitate restoration activities. The scope of such patrols includes a visual inspection of all trees within the strike zone in the fire perimeter. Abatement activities include topping dead/defective trees that could strike the lines or felling a tree if deemed required for worker safety, facility, or environmental protection.”<sup>84</sup>

Supporting Information & Analysis: SDG&E explained that the Bunnie and Coyote fires both impacted its service territory in 2023. The Bunnie and Coyote fires affected 184 and 466 acres, respectively. Following these incidents, SDG&E conducted post-fire hazard tree inspections in VMAs 394 and 462. SDG&E provided screenshots from its Powerworkz database of inspection work orders, labeled ‘VM Post Event Dispatch’, created in response to both fires. The inspection work orders documented the dates of the inspection, the impacted area’s VMA, asset IDs inspected, and a map of the fire perimeter.<sup>85</sup> The screenshots, along with SDG&E’s confirmation, indicated that it did not identify any hazard trees during either of these areas’ patrols; therefore, it did not conduct abatement activities. Energy Safety accepts that this explanation supports the absence of post-fire work within SDG&E’s service territory in 2023.

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<sup>83</sup> [Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (December 6, 2022), p. A-25 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

<sup>84</sup> [SDG&E's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true) (Rev. #1, October 23, 2023) p. 279

(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true).

<sup>85</sup> Data Request 260, Question 24; attachment: “2023\_SMV\_OEIS\_DR260\_Q24\_REDACTED.pdf.”



Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

### **Finding- 8.2.3.8 Emergency Response Vegetation Management**

SDG&E provided information consistent with the completion of work identified in initiative 8.2.3.8 Emergency Response Vegetation Management.

## **8.2.4 Vegetation Management Enterprise System**

The purpose of this initiative is to describe the “Operation of and support for centralized vegetation management and inspection enterprise system(s) updated based upon inspection results and activities such as hardening, maintenance, and remedial work.”<sup>86</sup>

### **Narrative Statements, Supporting Information & Analysis, and Conclusion**

#### **Statement 18**

Statement: “Vegetation Management utilizes the software system PowerWorkz to inventory vegetation and manage inspections. This work management system uses the CityWorks software platform and is the server side where SWOs [Scheduling Work Orders] and DWOs [Dispatch Work Orders] are created and submitted.”<sup>87</sup>

Supporting Information & Analysis: In its 2023-2025 WMP, SDG&E explained that it issues and tracks tree work by creating SWOs in each VMA. Then, SDG&E’s contractors create DWOs within each SWO, which gets delegated to field crews.<sup>88</sup> SDG&E provided an Excel file, generated from its CityWorks platform, documenting the total number of SWOs and DWOs in 2023.<sup>89</sup> Based on this file, 9,322 SWOs and DWOs were created and submitted in 2023. Each work order included its description (i.e. Memos, rebrush, retrims, and reliability work).

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

#### **Statement 19**

Statement: “The mobile application called Epoch is the mapping interface contractors use for data entry to record completed work. Epoch includes GIS layers, electric infrastructure, land

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<sup>86</sup> [Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (December 6, 2022), p. A-25 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

<sup>87</sup> [SDG&E's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true) (Rev. #1, October 23, 2023) p. 280 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true).

<sup>88</sup> [SDG&E's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true) (Rev. #1, October 23, 2023) p. 253 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true).

<sup>89</sup> Data Request 260, Question 25; attachment: “2023\_SMV\_OEIS\_DR260\_Q25.xlsx.”

ownership, and parcel information, and houses the electronic records for all tree and pole brushing assets.”<sup>90</sup>

Supporting Information & Analysis: SDG&E provided screenshots from its mobile application system, Epoch, of inventory tree and pole clearing records that show work activities performed in 2023. SDG&E also included a screenshot of Epoch’s landing page, which mapped all VMAs in SDG&E’s service territory, with the functionality to add basemaps, GIS layers, asset search, and work management to the map.<sup>91</sup>

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

### **Finding- 8.2.4 Vegetation Management Enterprise System**

SDG&E provided information consistent with the completion of work identified in Initiative 8.2.4 Vegetation Management Enterprise System.

## **8.2.5 Quality Assurance and Quality Control**

The purpose of this initiative is to describe the “Establishment and function of audit process to manage and confirm work completed by employees or contractors, including packaging QA/QC information for input to decision-making and related integrated workforce management processes”.<sup>92</sup>

### **Narrative Statements, Supporting Information & Analysis, and Conclusion**

#### **Statement 20**

Statement: During the post-trim QA/QC audit activity (WMP.505), an audit contractor performs a cursory vegetation inspection of all overhead lines within each VMA. This activity occurs 6 to 8 months following the routine scheduled detailed inspection activity and serves as a “mid-cycle” patrol to ensure vegetation does not pose a compliance or safety risk to the lines prior to the next inspection activity.”<sup>93</sup>

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<sup>90</sup> [SDG&E’s 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true) (Rev. #1, October 23, 2023) p. 280

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true>).

<sup>91</sup> Data Request 260, Question 26; attachment: “Epoch\_Screenshots.pdf.”

<sup>92</sup> [Energy Safety’s 2023-2025 Wildfire Mitigation Plan Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (December 6, 2022), p. A-25

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

<sup>93</sup> [SDG&E’s 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true) (Rev. #1, October 23, 2023) p. 265

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true>).

Supporting Information & Analysis: SDG&E provided an Excel file showing post-trim audit activities that were conducted among all 133 VMAs in 2023 and 2024.<sup>94</sup> The file contained the VMA, unique Schedule Work Order number, and the audit start and end date. SDG&E explained that within these audit activity timeframes, the cursory inspection, which is described as a quick review of the VMAs to identify any immediate hazard tree conditions, of each entire VMA occurred. Additionally, SDG&E stated that the routine tree trim schedules from the previous year's (2023) final months were audited in the beginning of 2024.

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

#### Statement 21

Statement: “The QA/QC Program (WMP.505) includes additional scoping during some activities. In conjunction with the routine post-trim audit activity within a VMA. An additional tree inspection of all lines is performed to identify any trees that will not hold compliance until the next routine pre-inspection activity.”<sup>95</sup>

Supporting Information & Analysis: SDG&E provided an Excel file documenting all instances of additional QA/QC scoping during activities in 2023. The file included the tree ID, VMA, species, inspection date, activity date, and HFTD tier.<sup>96</sup> SDG&E identified 1,234 trees during additional tree inspections along Distribution and Transmission lines in 2023. As a result of these additional QA/QC inspections, SDG&E performed various additional work activities, such as pruning and tree removals, across 57 different tree species.

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

#### Statement 22

Statement: “SDG&E uses a randomized, representative sample of all completed vegetation management work for the purposes of auditing. A sampling of 12 to 15 percent is used for all activities. Randomization of post trim audit samples include representation of multiple tree crews. A higher sampling percentage is used for some enhanced vegetation management activities in the HFTD, including a 100 percent post-trim audit of all completed trim and removal work generated from the off-cycle patrol (WMP.508) activities. This target may not be achieved in some instances due to inaccessibility of work locations and/or customer refusals.

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<sup>94</sup> Data Request 260, Question 7; attachment: “2023\_SMV\_OEIS\_DR260\_Q7\_Supplemental.xlsx.”

<sup>95</sup> [SDG&E's 2023-2025 WMP](#) (Rev. #1, October 23, 2023) p. 281

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true>).

<sup>96</sup> Data Request 260, Question 27; attachment: “2023\_SMV\_OEIS\_DR260\_Q27.xlsx.”

Additionally, audits are performed on 100 percent of all work completed on tree trim “Memo” work orders.”<sup>97</sup>

Supporting Information & Analysis: SDG&E provided several Excel files showing the results of all completed vegetation management audits (off-cycle patrols, Memo inspections, pre-inspection and tree trim audits, and pole clearing inspections). Additionally, SDG&E provided summary reports detailing instances where tree work was incomplete due to refusals, restricted access, or specific exceptions. The analysis for each of these is detailed below:

**Off-Cycle Patrols:** SDG&E audited approximately 62% of the total tree work orders, based on the unique tree ID, that were trimmed or removed during off-cycle patrols in the HFTD in 2023. Thus, SDG&E did not audit 100% of all trimming and removal work generated in the HFTD during off-cycle patrols.

However, SDG&E provided audit summary reports from its third-party auditor that revealed 40 instances where audits could not be conducted in 2023 due to inaccessibility (four reports), refusals (three reports), or exceptions (two reports).<sup>98</sup> The trees identified in these reports could account for the 38% of audits that were not completed, but SDG&E did not provide that clarification.

**Memos:** SDG&E performed vegetation management activities on 3,509 Memo work orders identified, based on the unique tree ID and the condition code filtered to include any ‘Memo’ labels. However, when filtering the audit activity date to 2023, SDG&E only audited 1,200 Memo work orders, or 34%, of the total Memo work orders that year.<sup>99</sup> Thus, SDG&E did not achieve its target of auditing 100% of all work completed on Memo work orders in 2023.

**Pre-Inspection and Tree Trim Activities:** Energy Safety reviewed an Excel file detailing all tree activity audits, including removals, Memos, retrims, and inspections.<sup>100</sup> When filtering the file to ‘Tree Trim Audits’ and the condition code to any completed prune work, the file shows that SDG&E conducted tree trim audits on 31,738 tree units. This represents 19% of its total tree units that received work, which was provided in an additional Excel file in response to statement four, showing all routine inspections and follow-up work for tree trimming/pruning activities on 162,811 tree units in 2023.<sup>101</sup> Thus, SDG&E exceeded its target of auditing 12 to 15% of the total number of trees trimmed in 2023. Additionally, Energy Safety reviewed the same Excel file detailing all audited pre-inspections<sup>102</sup> and an Excel file showing all inventory trees that were inspected during the annually scheduled routine activities.<sup>103</sup> These files

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<sup>97</sup> [SDG&E’s 2023-2025 WMP](#) (Rev. #1, October 23, 2023) p. 282

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true>).

<sup>98</sup> Data Request 260, Question 28; attachment: “2023\_SMV\_OEIS\_DR260\_Q28\_REDACTED.pdf.”

<sup>99</sup> Data Request 260, Question 28; attachment: “Memo and Off Cycle HFTD Audits.xlsx.”

<sup>100</sup> Response to DR-260, question 28; attachment “Pre-Inspection and Tree Trim Audits.xlsx.”

<sup>101</sup> Data Request 260, Question 8; attachment: “2023\_SMV\_OEIS\_DR260\_Q8.xlsx.”

<sup>102</sup> Data Request 260, Question 28; attachment: “Pre-Inspection and Tree Trim Audits.xlsx.”

<sup>103</sup> Data Request 260, Question 3; attachment: “2023\_SMV\_OEIS\_DR\_260\_Q3.xlsx.”

showed that SDG&E conducted pre-inspection audits on 86,268 tree units. This represents 17% of its total tree units that were pre-inspected and audited (516,282). Thus, SDG&E exceeded its target of auditing 12 to 15% of the total number of trees pre-inspected and trimmed in 2023. SDG&E explained that upon maintaining the audit results, contractor leads utilize the data to perform training based on the findings.

**Pole Clearing:** SDG&E provided an Excel file regarding its Pole Clearing target (WMP .512) which showed that it cleared 35,251 poles units of the total 44,707 pole units in its service territory in 2023.<sup>104</sup> Additionally, Energy Safety reviewed an Excel file of pole clearing audit results which indicated that SDG&E audited 6,470 pole units in 2023.<sup>105</sup> Thus, SDG&E audited approximately 18% of the poles cleared in 2023, which had an approximate 99% pass rate. SDG&E exceeded its target to audit 12 to 15% of the total number of poles cleared in 2023.

Conclusion: SDG&E did not provide information consistent with the completion of all work identified in this statement. Sufficient documentation was provided supporting QA/QC work for pole clearing, pre-inspections, and tree trim activities but not for Memos or off-cycle patrols.

### **Finding- 8.2.5 Quality Assurance and Quality Control**

SDG&E did not provide information consistent with the completion of work identified in Initiative 8.2.5 Quality Assurance and Quality Control.

## **8.2.6 Open Work Orders**

The purpose of this initiative is to describe the “Actions taken to manage the electrical corporation’s open work orders resulting from inspections that prescribe vegetation management activities.”<sup>106</sup>

### **Narrative Statements, Supporting Information & Analysis, and Conclusion**

#### **Statement 23**

Statement: “Routine work is generally scheduled to be completed within 120 days of inspection, whereas priority work is generally scheduled to be completed within 30 days of inspection.”<sup>107</sup>

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<sup>104</sup> Data Request 260, Question 13; attachment: “2023\_SMV\_OEIS\_DR260\_Q13.xlsx.”

<sup>105</sup> Data Request 260, Question 28; attachment: “Pole Clearing Audits.xlsx.”

<sup>106</sup> [Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (December 6, 2022), p. A-25 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

<sup>107</sup> [SDG&E's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true) (Rev. #1, October 23, 2023) p. 285

(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true).

Supporting Information & Analysis: SDG&E provided an Excel file which included routine and priority work in 2023.<sup>108</sup> Based on this file, SDG&E conducted 130,868 routine work and 84,479 priority work activities in 2023. Energy Safety requested the date of inspection, and the date of corrective work completed to be included in this file. A subsequent analysis of these dates indicated that most of the routine work was completed within a 120-day period, however, in some cases, work was not completed for as long as 6 to 11 months after the initial inspection. Specifically, 20,742 instances (16%) of routine work were completed outside of the 120-day time frame. Additionally, SDG&E conducted 3,024 priority inspections and subsequent work activities in 2023. Most of the priority work was completed in 30 days, but in some cases, work was not completed for as long 10 months after the initial inspection. Specifically, 1,960 (2%) instances of priority work were completed outside of the 30-day time frame. Furthermore, inspections initiated in late 2023, both routine and priority work, carried over into the beginning of 2024 for work completion.

The WMP language states that work should be completed generally within 120 and 130 days, implying some latitude in the time frame of completion. However, the 120- and 30-day timeframes are intended to meet the overall objective of the WMP, which is prevention of wildfire ignition risk. Not adhering to those time frames for routine and priority work contributes to unnecessary risk on the system. Therefore, Energy Safety could not conclude that the work was completed to meet the objective of the WMP.

Conclusion: SDG&E did not provide information consistent with the completion of work identified in this statement.

### **Finding- 8.2.6 Open Work Orders**

SDG&E did not provide information consistent with the completion of work identified in Initiative 8.2.6 Open Work Orders.

## **8.2.7 Workforce Planning**

The purpose of this initiative is to describe “Programs to ensure that the electrical corporation has qualified vegetation management personnel and to ensure that both employees and contractors tasked with vegetation management responsibilities are adequately trained to perform relevant work.”<sup>109</sup>

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<sup>108</sup> Data Request 260, Question 29; attachment: “2023\_SMV\_OEIS\_DR260\_Q29.xlsx.”

<sup>109</sup> [Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (December 6, 2022), p. A-26 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

## Quantitative Target or Commitment, Supporting Information & Analysis, and Conclusion

SDG&E provided the following information regarding Special Certification Requirements in Table 8-20 of its 2023-2025 WMP.<sup>110</sup>

Auditors	Tree Trimmers	Pre-Inspectors
International Society of Arboriculture (ISA) Certified Arborist	Line Clearance qualified arborist certification (or trainee)	International Society of Arboriculture (ISA) Certified Arborist

Supporting Information & Analysis: SDG&E provided an Excel file detailing credentials of its tree work personnel. The file included eight auditors with ISA Certified Arborist numbers, 36 tree trimmer trainees with Line Clearance Qualified Arborist Certifications, and 18 pre-inspectors with ISA Certified Arborist numbers.<sup>111</sup>

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

## Narrative Statements, Supporting Information & Analysis, and Conclusion

### Statement 24

Statement: “Vegetation Management provides initial training for all its internal personnel including the subjects referenced above as well as annual refresher training for environmental, safety, compliance, fire preparedness, and vehicle driver safety. Additionally, SDG&E employees receive online refresher training annually on Affiliate Compliance Rules, Business Conduct and Ethics, North American Electric Reliability Corporation (NERC) Compliance, Customer Information, and Diversity & Inclusion.”<sup>112</sup>

Supporting Information & Analysis: SDG&E provided its compliance training curriculum, and a screenshot image of a “Diversity and Inclusion Fundamentals” training course provided to staff in 2023, as documentation of its programs that ensure that it has qualified vegetation

<sup>110</sup> [SDG&E's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true) (Rev. #1, October 23, 2023) pp. 287-289 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true).

<sup>111</sup> Data Request 260, Question 31; attachment: “2023\_SMV\_OEIS\_DR260\_Q31\_REDACTED.xlsx.”

<sup>112</sup> [SDG&E's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true) (Rev. #1, October 23, 2023) p. 286 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true).

management personnel.<sup>113</sup> SDG&E also included a report summarizing completion of California Public Utilities Commission Affiliate Compliance Training, Code of Business Conduct, and NERC Reliability Standards Overview by 22 internal personnel.<sup>114</sup>

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

#### Statement 25

Statement: “Contractors are responsible for recruiting and training their employees including utility regulations, fire awareness, electrical safety, hardware identification, and activity-specific work processes and procedures. SDG&E provides contractor training for its work management system including hardware and software applications. Contractors are additionally required to perform in-house annual refresher 2023-2025 Wildfire Mitigation Plan training that includes the following modules: fire preparedness, environmental protection, hazard tree assessment, and customer service.”<sup>115</sup>

Supporting Information & Analysis: SDG&E provided the qualifications and internal training materials from 2023 for its three vegetation management contractors. For each contractor, training materials for subjects such as wildfire preparedness and prevention, standard operating procedures for mechanical machinery and specific work processes, and relevant electrical and vegetation management hazard information was included.<sup>116</sup>

Additionally, to demonstrate that contracting staff was qualified for required vegetation management work, SDG&E submitted two Excel files detailing contractor qualifications. The first included 141 employees and their job titles, along with their Line Clearance Qualified Arborist (Employee ID) number. Of these employees, five were ISA Certified Arborists. The second file showed fourteen employees and their ISA Certified Arborist numbers.<sup>117</sup>

Conclusion: SDG&E provided information consistent with the completion of work identified in this statement.

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<sup>113</sup> Data Request 260, Question 30; attachments: “Compliance Training Curriculum.pdf” and “Diversity & Inclusion Training Content.pdf.”

<sup>114</sup> Data Request 260, Question 30; attachment: “2023\_SMV\_OEIS\_DR260\_Q30\_REDACTED.xlsx.”

<sup>115</sup> [SDG&E's 2023-2025 WMP](#) (Rev. #1, October 23, 2023) p. 285

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true>).

<sup>116</sup> Data Request 290, “SDGE Response OEIS-SDGE-290\_Attachments.zip”

<sup>117</sup> Data Request 290, “SDGE Response OEIS-SDGE-290\_Attachments.zip”



**Finding- 8.2.7 Workforce Planning**

SDG&E provided information consistent with the completion of work identified in Initiative 8.2.7 Workforce Planning.