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VIA ELECTRONIC FILING

Docket # 2024NOV

Patrick Doherty
Program Manager, Compliance Assurance Division
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

**RE: San Diego Gas & Electric Company's Response to Notice of Violation –
NOV_CAD_SDGE_LOK_20241105_1318**

Dear Program Manager Doherty:

San Diego Gas & Electric Company (SDG&E) provides this response to the finding identified in the Notice of Violation “NOV_CAD_SDGE_LOK_20241105_1318” (Notice of Violation or NOV) issued by the Office of Energy Infrastructure Safety (Energy Safety) on December 19, 2024 regarding Energy Safety’s inspection of work completed by SDG&E in accordance with its 2024 Wildfire Mitigation Plan (WMP). Specifically, the NOV describes that on November 5, 2024, Energy Safety conducted an inspection of SDG&E’s WMP initiatives in the vicinity of the city of Bonsall, California and found the following violation:

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 complete avian protection installation on Pole ID P10153, Grid Hardening ID 530000338531-P10153, at coordinates 33.2962825517085, - 117.22395643603214. Energy Safety considers this completeness violation to be in the Minor risk category.

SDG&E is not requesting a written hearing for the findings addressed in this response; however, SDG&E reserves the right to raise these points in subsequent procedural stages and/or proceedings as necessary. Further, although Energy Safety has the right to refer certain notices to the California Public Utilities Commission for enforcement action, the findings in this notice do not merit referral, as there is inadequate support for a finding that SDG&E has failed to substantially comply with its approved WMP.¹

¹ See Pub. Util. Code §8386.1.

I. SDG&E RESPONSE

A. Violation 1 – Avian Protection, Failure to Complete Installation on P10153.

SDG&E confirms that the avian retrofit was installed as designed but the guard had “dislodged” or come loose. SDG&E corrected the dislodged avian mitigation cover at pole P10153 on December 31, 2024 and provides the attached as-built documentation demonstrating the correction. See Attachment A.

II. CONCLUSION

SDG&E appreciates Energy Safety’s continued efforts to identify, communicate, and work together to promote wildfire safety throughout California.

Respectfully submitted,

/s/ Laura M. Fulton

Attorney for

San Diego Gas and Electric Company

Attachment A – Screenshots

Figure 1- As Built

ASBUILT FORM

Header Section

Notification # 30000732158 Work Order # 530000367015 Operation # 0006

Job Name OH REINFORCE REPL DETERIORATED MINOR FAC Construction Supr. / FOS

Address SOUTH MISSION RD Street2 City BONSALL Zipcode

Circuit 233 Not Built To Design Requires Recalculation No Material Used

Event ID 20241231092437 TOM Bros EFR Ref # 20241231092437

Order Comments C/O BIRD GAURD

Crew Comments

Order Completion Section

All Materials have been installed and tested in accordance with the applicable SDGE Standards.

Crew Foreman ID Crew Foreman Completion Date 2024-12-31

Location & Material Section

Location # 0001	Location Description Default Location
Existing Structure # P10153	New Structure #
Location Service / Meter Address	

Location Comment

Location Crew Comment

CU ID	Work Function	Stock Code	Stock Description	UOM	Plan. Qty.	Act. Qty.	As Designed
+	INSTALL	S280654	COVER, DOUBLE INSULATOR	EA		4	<input type="checkbox"/>
+	INSTALL	S280660	COVER, EXTENSION ARM FOR INSULATOR COVER	EA		8	<input type="checkbox"/>

Location Completion

All Materials have been installed and tested in accordance with the applicable SDGE Standards.

Crew Foreman ID Crew Foreman Completion Date 2024-12-31

Tag Identification

No Tag Information for this Location

Equipment Information

No Equipment Information for this Location