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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\_20241009\_0931**

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\_20241009\_0931 (Notice of Violation or NOV) issued by the Office of Energy Infrastructure Safety (Energy Safety) on December 24, 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 October 9, 2024, Energy Safety conducted an inspection of SDG&E’s WMP initiatives in the vicinity of the city of El Cajon, California and found the following violation:

Violation 1. Energy Safety observed that in implementing 2024 WMP initiative 8.1.4.6 - Lightning Arrester Removal/Replacement, SDG&E failed to install California Department of Forestry and Fire Protection (CAL FIRE) approved lightning arresters on Pole ID P774530, Grid Hardening ID 530000350500-P774530, at coordinates 32.856142921778556, -116.83654642659396. 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.<sup>1</sup>

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

**I. SDG&E RESPONSE****A. Violation 1 – Lightning Arrester Removal/Replacement Pole ID P774530**

SDG&E respectfully notes that the initial date reported for work completion of this structure was in error. The lightning arrester work at P774530 was completed on October 23, 2024, after Energy Safety performed its inspection.

SDG&E is providing the following work order and photos as supporting evidence in Attachment A:

- Photos of the post-NOV structure taken on 12/31/2024 that show installed CalFire approved polymer lightning arresters per OH1247
- Signed construction work order (WO# 530000350500) from 10/23/2024

**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- AsBuilt

**ASBUILT FORM**

**Header Section**

Notification # 300000693487 Work Order # 530000350500 Operation # 0006

Job Name EAHV P75346 C246 BNDL 8 LA Construction Supr. / FOS

Address OLDE HIGHWAY 80 Street2 City EL CAJON Zipcode 92021

Circuit 246 Not Built To Design Requires Recalculation  No Material Used

Event ID TOM Bros 1233B3

Order Comments Special Ins :WF4-3HRS//HLO & SWP #300008 REQUIRED. TC CREW. DISPATCH TO CONTACT CUSTOMER 5 DAYS PRIOR FOR ACCESS TO POLES (GATES): 1 80 (951) 572-1200GATE ACCESS & TO HAVE TRUCKS MOVED. WORK WITH 3X693456 -

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 2024-10-23

**Location & Material Section**

Location # 0001	Location Description Location 0001
Existing Structure # P75346	New Structure #
Location Service / Meter Address	

**Location Comment**

ERAL CUTOUT COVERS. "ISOLATE SWI"

**Location Crew Comment**

CU ID	Work Function	Stock Code	Stock Description	UOM	Plan. Qty.	Act. Qty.	As Designed
IPU1	INSTALL	S429270	INSULATOR, VISE TOP, POLYMER, 1". ***THI	EA	1.000	1	<input checked="" type="checkbox"/>
KBKT1	INSTALL	S166134	121211 BRACKET, INSULATOR, STAND-OFF HOT	EA	1.000	1	<input checked="" type="checkbox"/>
CFLA15	INSTALL	S113802	ARRESTER, SURGE, 15KV, POLIM-K CLASS IEC	EA	9.000	9	<input checked="" type="checkbox"/>
LA12	REMOVE	S289602	DEPLETE MATERIAL COVER, LIGHTNING ARREST	EA	9.000	9	<input checked="" type="checkbox"/>
LA12	REMOVE	S113248	ARRESTER, 10KV MOV, W/O WILDLIFE ASSEMBL	EA	9.000	9	<input checked="" 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 2024-10-23

**Tag Identification**

No Tag Information for this Location

**Equipment Information**

No Equipment Information for this Location





