



Laura M. Fulton
Senior Counsel
8330 Century Park Court, CP32F
San Diego, CA 92123-1548
LFulton@SDGE.com

January 21, 2025

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_0839**

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_0839" (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 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 8.1.2.10.1 Avian Protection Program (WMP.972), SDG&E failed to provide accurate data in reporting that avian protection was installed on Pole ID P774530, Grid Hardening ID 530000350444-P774530 at coordinates 32.85614745479225, -116.83653518468476.

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 Provide Accurate Data on P774530.**

SDG&E respectfully notes that the initial date reported for work completion of this structure was in error. The avian protection work at P774530 is currently pending per the attached construction order P774530 Construction Order 530000383317. See Attachment A.

Going forward, SDG&E will ensure as-built documentation is available prior to reporting an activity as complete.

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 – Screenshot

Figure 1- Construction Order 530000383317

01/08/2025 14:06:20		SAN DIEGO GAS AND ELECTRIC		PAGE NO 1	
BUDGET CODES: 22247.4		CONSTRUCTION ORDER - CONTRACTOR COPY		DESIGN NUMBER: 80834038	
=====					
WORK ORDER:530000383317 STATUS: OSNO PC PROJ NOTIP: 300000690537 JOB NOTIP:300000756732 JOB TYPE:DI-OF MCU ORDER#: 4421298					
DESIGN DESCRIPTION: EAHV P774530 C246 INSTALL AVIAN PROTECT					
START DT: 01/03/2025 END DT: 12/31/2025 JOB NAME: EAHV P774530 C246 INSTALL AVIAN PROTECT NO. OF LOCATIONS: 1					
LOCATION: ADDRESS: 15547 OLDE HIGHWAY 80					
DISTRICT:EST		CITY: EC	MAIN WORK CENTER: CPD EASTERN ELEC OH		THOMAS BROS:1233-C3
EXISTING FACILITIES INSTALLED ON:					
CUSTOMER CONTACT: CCB027 Call Center of Future PHONE: RELATED JOB NOTIFICATION:					
DESIGNED BY: [REDACTED]		PHONE: 6194413812	DATE ISSUED: [REDACTED]		DATE PREPARED: [REDACTED]
JOB COORD: [REDACTED]		PHONE: [REDACTED]	PROJ MGR: [REDACTED]		PHONE: [REDACTED]
=====					
ONE-WAY TRAVEL TIME: 0.5000 YARD TIME: 1.0000 TRAVEL YARD FACTOR: 0.3333					
=====					
WORK WITH:			CIRCUIT NO: 246		
UG CREW TYPE:			CREW HOURS:		
OH CREW TYPE:OVERHEAD FIELD MEMO LABOR - 1WF4 CREW			CREW HOURS:2		
ASSIST CREW TYPE:			CREW HOURS:		
TRAFFIC CONTROL PERMIT:		TRAFFIC CONTROL CREW: X	PERMIT:		
TRAFFIC PERMIT SHORT TEXT:		TRAFFIC CREW SHORT TEXT:	PERMIT SHORT TEXT:		
USA REQ:		VEG MANAGEMNET:	ENVIRONMENTAL FULL:		
USA REQ SHORT TEXT:		VEG MANAGEMNET SHORT TEXT:	ENVIRONMENTAL FULL SHORT TEXT:		
NO PARKS: X		ENVIRONMENTAL QUICK RELEASE: X	HAZMAT REQ:		
NO PARKS SHORT TEXT:		ENVIRONMENTAL FULL SHORT TEXT:	HAZMAT REQ SHORT TEXT:		
POLE LOADING:		CLEVELAND NAT FOREST:	POLE HAULING:		
POLE LOADING SHORT TEXT:		CLEVELAND NAT FOREST SHORT TEXT:	POLE HAULING SELECTION:		
			POLE HAULING SHORT TEXT:		
DIGGING: DIGGING:		SWITCH PLAN: X HLO:	PLANNED OUTAGE: X		
DIGGING: HAND DIG: MACHINE DIG:		SWITCH PLAN ID: 327162			
DIGGING SHORT TEXT:		SWP SHORT TEXT: SWP No#327162/			
STREET REPAIR:		JOINT MEET WITH SHORT TEXT:			
EQUIPMENT REQUIRED SHORT TEXT:		PERMIT REQUIRED SHORT TEXT:			
SPECIAL INSTRUCTIONS:WF4-2HRS//HLO # 327162 REQUIRED. TC CREW/PLAN/PERMIT.					
ADDITIONAL					
PRE-REQS					
=====					
ESTIMATED CREW REQUIREMENTS					
CREW TYPE	DESCRIPTION	CREW HOURS	MAN HOURS		
1-WF4S	WORKING FOREMAN 4-MAN OH ELECTRIC	6.2000	24.8000		
TC2S	TRAFFIC CONTROL 2 MAN STRAIGHT TIME	1.0000	0.0000		
	TOTAL HOURS:	7.2000	24.8000		
=====					
EQUIPMENT	DESCRIPTION	EQUIPMENT HOURS			
P03JLS	32BAA 4X4 1/2 T PICKUP	1.0000			
P102LS	51PAA OH/UG ASSIST TRUCK	2.0000			

01/08/2025 14:06:20

SAN DIEGO GAS AND ELECTRIC
CONSTRUCTION ORDER - CONTRACTOR COPY

PAGE NO 2
DESIGN NUMBER: 80834038

BUDGET CODES: 22247.4

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WORK ORDER:530000383317 PROJ NOTIF:300000690537 JOB NOTIF:300000756732 JOB TYPE:DI-OF JOB NAME:BAHV F774530 C246 INSTALL AVIA

DESIGN DESCRIPTION: BAHV F774530 C246 INSTALL AVIAN PROTECT

STATUS:QSN0 PC DESIGNED BY: [REDACTED] PHONE: 6194413812

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F173LS

F189LS

F200LS

S30BA 614 MECH ELECT CONST TRUC

S40DC 616 5567EPT AER LIFT W/AR

68ABA ARROW BOARD TRAILER

2.0000

2.0000

1.0000

TOTAL HOURS:

8.0000

NO LONG LEAD MATERIAL FOUND

01/08/2025 14:06:20

SAN DIEGO GAS AND ELECTRIC
CONSTRUCTION ORDER - CONTRACTOR COPY

PAGE NO 3
DESIGN NUMBER: 80834038

BUDGET CODES: 22247.4

=====

WORK ORDER:530000383317 PROJ NOTIF:300000690527 JOB NOTIF:300000756732 JOB TYPE:DI-OF JOB NAME:BAHV F774530 C246 INSTALL AVIA
DESIGN DESCRIPTION: BAHV F774530 C246 INSTALL AVIAN PROTECT
STATUS:OSNO PC DESIGNED BY: Hanley Crystal PHONE: 6194413812

=====

LOCATION: 0001 LOCATION DESCRIPTION: Location 0001 DISTRICT: EST NO. OF LOCATIONS: 1 OF 1

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WRK FUN	CU ID	STOCK	DESCRIPTION	QTY REQD	UN	ACT QTY	WRK RSP	MAT RSP	ACCT TRM1	STAN PAGE	INST/APP BY	DATE
I-N-S	PFCORG	S289614	COVER, AVIAN, 900A, DISC, CUTOUT STYLE	6	EA		U	U	OGM	1640		
			COVER, SMU/CMU, WITH PIN AND SLIDE	6	EA							
I-N-S	LN-S/E		LANE CLOSURE STREET - STA/EQUIP	1	EA		U		OGM			
I-N-S	OPM1WF4		OVERHEAD FIELD MEMO LABOR - 1WF4 CREW	2	HR		U		OGM			

WRK FUN FAC CODE DESC

EXIST TAG :

NEW TAG:

P774530

CONSTRUCTION NOTES:
CREW TO INSTALL UNIVERSAL COVERS ON
DISCONNECTS.

LOC 001 ☐ COMPLETED ☐ PARTIALLY COMPLETED ☐ ENERGIZED

AS-BUILT RECORDED BY: _____ DATE: _____ MATERIAL CHECK BY: _____ DATE: _____