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VIA ELECTRONIC FILING

Docket # 2024 NOV

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_0804**

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_0804” (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 P76656, Grid Hardening ID 530000350444-P76656 at coordinates 32.85594773165022, -116.8373373489954.

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 P76656.**

SDG&E respectfully notes that the initial date reported for work completion of this structure was in error. The avian protection work at P76656 was completed on October 23, 2024, after Energy Safety performed its inspection. Going forward, SDG&E will ensure as-built documentation is completed prior to reporting an activity as complete.

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

- Photos of the P76656 taken on 12/31/2024 that show installed covered jumper wire and bird guard on center phase per OH1600
- Signed construction work order (WO# 530000350444) 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- As-Built

ASBUILT FORM

Header Section			
Notification # 30000693474	Work Order # 530000350444	Operation # 0007	
Job Name EAHV P170230 P76656 C246 BNDL 8 AVIAN		Construction Supr. / FOS	
Address OLDE HIGHWAY 80	Street2	City EL CAJON	Zipcode 92021
Circuit 246	Not Built To Design Requires Recalculation <input type="checkbox"/> No Material Used <input type="checkbox"/>		
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 # P170230	New Structure #
Location Service / Meter Address	

Location Comment

P170230: C/O HS LEADS, INS 2-BUSHING COVERS, 1-CORTEX PIN & 1- POLY JAW CLAMP TOP. (GATE ACCESS)
 P76656: INS 1- AVIAN LINE COVER (POLE POSITION).

Location Crew Comment

CU ID	Work Function	Stock Code	Stock Description	UOM	Plan. Qty.	Act. Qty.	As Designed
BSHCOV	INSTALL	S289670	COVER, BUSHING, TRANSFORMER, ARRESTER, A	EA	15.000	15	<input checked="" type="checkbox"/>
CCOUNI	INSTALL	S289662	COVER, CUTOUT, UNIVERSAL FIT THIS REPLA	EA	6.000	6	<input checked="" type="checkbox"/>
PIRM	INSTALL	S289672	COVER, INSULATOR, TANGENT, SIDE TIE, TOP	EA	2.000	2	<input checked="" type="checkbox"/>
BCH	INSTALL	S402440	HANDWHEEL, BUSHING, TRANSFORMER, HI-SIDE	EA	6.000	6	<input checked="" type="checkbox"/>
POLY4J	INSTALL	S815044	WIRE, CU, #4, 7 STR, POLYTHYLENE COVER,	FT	60.000	60	<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





