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VIA ELECTRONIC FILING

Docket # 2024NOV

Sheryl Bilbrey
Program Manager, Environmental Science 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
ESD_SDGE_CAC23_20240924_1133**

Dear Program Manager Bilbrey:

San Diego Gas & Electric Company (SDG&E) provides this response to the finding identified in the Notice of Violation “NOV ESD_SDGE_CAC23_20240924_1133” (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 September 24, 2024, Energy Safety conducted an inspection of SDG&E’s WMP initiatives in the vicinity of the city of Pauma Valley, California and found the following violation:

Violation 1 – Energy Safety observed that in implementing WMP initiative 8.2.3.3 - Clearance, SDG&E failed to adhere to its protocol for 8.2.3.2 Wood and Slash Management (WMP.497) near pole ID 414181 at coordinates 33.291722, -116.968414. Energy Safety considers this violation for adherence to protocol to be in the “Minor” risk category.

SDG&E had an informal conference with Environmental Safety Division (ESD) on January 2, 2025 and is still waiting for a 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 – Wood and Slash Management, Failure to Adhere to Protocol near P414181.

SDG&E respectfully notes that its investigation into this NOV determined that the cause was related to third-party activity, and not the result of SDG&E tree trimming.

SDG&E investigated this NOV related to tree trimming debris left in the field on December 20, 2024. On that date, SDG&E interviewed the adjacent property owner who stated that he had hired a contractor to perform tree trimming within and adjacent to his property. That contractor performed the work in September, 2024. He acknowledged the debris was likely the result of his hired contractor, apologized for the confusion, and stated he would have his contractor return to complete the clean-up.

SDG&E further corroborates the debris left on site was not related to its line-clearance operations based on the following: 1) SDG&E performed line clearance tree trimming on June 5, 2024, more than three months prior to the date the third-party performed work. The condition of the tree debris on the ground did not comport with the elapsed time following SDG&E trimming. 2) The presence of topping or heading cuts on the trees is not consistent with SDG&E trimming. 3) The amount of resprouting at the point where cuts were made is consistent with the timeframe following the third-party trimming.

A follow-up visit by SDG&E on December 23, 2024 confirmed that the property owner had removed all remaining tree trimming debris from the site.

SDG&E shared its investigation and findings with ESD during an informal conference regarding this NOV on January 2, 2025 and on January 14, 2025 during a regular monthly meeting between ESD and SDG&E. SDG&E is still waiting for a response from those informal conversations and is submitting this response in the abundance of caution.

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 – Pictures

Open NOV Update: NOV ESD CAC23 20240924 1133

Trees trimmed by 3rd-party include oak.
No oak was assigned to SDG&E tree contractor to work.



1

Open NOV Update: NOV ESD CAC23 20240924 1133

Debris cleared and stacked by 3rd-party contractor inside property.



2

Open NOV Update: NOV ESD CAC23 20240924 1133

Improper pruning cuts (“heading”; “stubbing”) made by 3rd-party.
Post-pruning resprouting consistent with ~ 2-3 months’ growth



3

Open NOV Update: NOV ESD CAC23 20240924 1133

12/23/24 - All vegetation debris removed by 3rd-party



4