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**VIA ELECTRONIC FILING**

**Docket # 2023-SVM**

Caroline Thomas Jacobs  
Director, Office of Energy Infrastructure Safety  
715 P Street, 20th Floor  
Sacramento, CA 95814

**Re: SDG&E 2023 SVM Audit Corrective Action Plan**

Dear Director Thomas Jacobs:

San Diego Gas & Electric ("SDG&E") hereby provides this response to the audit findings listed in Table 1 of the Office of Energy Infrastructure Safety's ("Energy Safety") Audit on San Diego Gas & Electric Company's 2023 Substantial Vegetation Management Work ("SVM Audit") issued on December 31, 2024. The SVM audit evaluated the vegetation management section of SDG&E's 2023-2025 Wildfire Mitigation Plan (WMP) to assess whether SDG&E performed the work specified by its quantitative commitments and executed its verifiable statements. Energy Safety found that SDG&E performed the work required for (9) nine of (13) thirteen initiatives in the 2023-2025 WMP but found that SDG&E did not complete the work required by (5) five initiatives. As a result of these findings, Energy Safety directed SDG&E to undertake certain corrective actions associated with the five areas in which it was unable to verify that SDG&E completed the required SVM work.

SDG&E generally appreciates Energy Safety's notation that the audit "is not an assessment of the quality of SDG&E's execution of its vegetation management program," and SDG&E reiterates its commitment to excellence in utility vegetation management and the reduction of risk through its vegetation management activities. For certain areas, SDG&E disagrees with Energy Safety's assessment that it did not complete the vegetation management work described in its WMP. With respect to one area in particular, "Section 8.2.3.3: Vegetation Management and Fuels Clearance," SDG&E believes that Energy Safety's conclusion that SDG&E failed to complete this program is based on mistaken interpretation of SDG&E's data. In other areas, SDG&E submits that it completed the work described but acknowledges that there are areas for improvement in documentation to assist in review and auditability of work performed. SDG&E provides additional detail regarding some of the areas alleged to have been incomplete and includes corrective actions in the discussion below.

**I. SDG&E's Response to the Findings and Corrective Action for Initiative 8.2.2.2 Vegetation Management Inspections**

<b>Initiative Number:</b>	8.2.2.2 Vegetation Management Inspections
<b>Finding:</b>	Failure to provide information consistent with the completion of work identified in 8.2.2.2 Off-Cycle Inspections

Statement 5 of the SVM Audit provides that SDG&E did not provide information consistent with the completion of twice-annual inspections of Century Plants within the service territory. SDG&E appreciates that Energy Safety's Audit Report notes SDG&E's explanation that while its records specifically provide that 68% of century plants were inspected twice in 2023, the remaining plants were inspected during annual, routine inspections, and records pertaining to the century plant inspection were not updated for those remaining 32% of plants, even if the second inspection in fact occurred. Based on these records, Energy Safety was unable to verify completion of the work.

SDG&E currently has an inventory population of approximately 33,800 Century plants (units) which are dispersed throughout 129 of the total 133 Vegetation Management Areas (VMA) that comprise SDG&E's service territory. This number changes over time as new units are added to the system and others are removed from inventory. The targeted species patrol for Century plants occurs in a compressed timeframe (~2 months) in the spring as this is the time when the plant typically blooms. Therefore, in several VMAs the targeted species patrol occurs in the same month as the routine-scheduled (detailed) inspection. As such, the Century plants in these VMAs are not inspected under a separate, unique dispatch work order that would represent the second inspection activity. Additionally, during the detailed inspection, all Century plant records are updated, whereas, during the targeted species patrol, only the Century plants that require work before the next scheduled inspection activity are updated. Therefore, not all Century plant records receive two distinct inspection activities.

As a corrective action, SDG&E will modify and stagger its targeted species patrol schedule for Century plants to avoid overlap with the detailed inspection schedule of the VMAs. Each detailed inspection and targeted species activities will have a separate and distinct work order to effectively evidence these activities. All Century plant records will be updated during the detailed inspection, and only records that require work will be updated during the targeted species patrol.

In its conclusion of the review of Statement 6 of the SVM Audit, OEIS noted SDG&E did not provide information consistent with the completion of targeted species patrols for Bamboo.

SDG&E currently has an inventory population of approximately 6,820 bamboo units which are dispersed throughout 118 of the total 133 VMAs that comprise SDG&E's

service territory. This number changes over time as new units are added to the system and others are removed from inventory. The targeted species patrol for bamboo is currently scheduled to occur in the summer and in the fall/winter. Therefore, in several VMAs the targeted species patrol occurs in the same month as the routine-scheduled (detailed) inspection. As such, the bamboo in these VMAs are not inspected under a separate, unique dispatch work order that would represent a separate inspection activity. Additionally, during the detailed inspection, all bamboo records are updated, whereas, during the targeted species patrol, only the bamboo that require work before the next scheduled inspection activity are updated. Therefore, not all bamboo records receive multiple inspection activities.

SDG&E's experience and history with bamboo growth rates indicates that the fall/winter flush represents the optimum timeframe to conduct the targeted species patrol for bamboo. Additionally, after further consideration of the impact of multiple, targeted patrols for bamboo (i.e., impact to routine activity schedules, impact to customers, redundant/overlapping activities), SDG&E believes a fall/winter patrol of bamboo is sufficient as the targeted species patrol. SDG&E further believes the routine, detailed inspection and post-trim audit activities for VMAs scheduled in the summer allows for timely inspection of bamboo in those associated VMAs.

As corrective action, to minimize disruption to schedules and avoid conflicting, missing, or redundant work activities, SDG&E will modify and stagger its targeted species patrol schedule for bamboo to avoid overlap with the detailed inspection schedule of the VMAs. SDG&E will perform one targeted species patrol for all bamboo in the fall/winter. Each detailed inspection and targeted species activity will have a separate and distinct work order to effectively evidence these activities. All bamboo records will be updated during the detailed inspection, and only records that require work will be updated during the targeted patrol. To avoid further confusion regarding the parameters of this program, SDG&E will also address updates to the language describing this program in its 2026-2028 WMP.

## **II. SDG&E's Response to the Findings and Corrective Action for Initiative 8.2.3.2 Wood and Slash Management**

<b>Initiative Number:</b>	8.2.3.2 Vegetation and Fuels Management-Wood and Slash Management
<b>Finding:</b>	Failure to provide information consistent with the completion of all work identified in initiative 8.2.3.2.

In its conclusion of the review of Statement 9 of the SVM Audit, OEIS noted SDG&E did not provide information consistent with the completion removal of "most of the wood and slash debris resulting from routine trimming and removal..." SDG&E maintains that, per its standard operating procedures and tree trimming vendor contracts,

wood and slash debris are removed from tree trimming sites unless the customer specifically requests otherwise. SDG&E acknowledges, however, that SDG&E's tree-level data regarding this program does not specifically include acknowledgement of the removal of wood and slash debris.

SDG&E explained in its 2023-2025 WMP its standard operating protocol to remove all wood and slash debris associated with tree operations from properties except for large, woody material which is left on site. Large, woody material is generated during large diameter tree branch pruning associated with hazard trees, and large diameter removals. Where such work occurs, the residual large wood is cut into manageable lengths for customer use or disposal. SDG&E does not specifically record for each tree trimmed or removed whether woody debris was left on site, but these terms are also included in SDG&E's agreements with tree trimming vendors.

As a corrective action, SDG&E will explore the feasibility of creating a new field within the electronic tree record that enables the tree crew to document the properties where wood debris was left on site. In the interim, SDG&E has the current capability of inferring upon which properties woody debris was left on site based on the tree's condition code which identifies where large diameter, hazard tree pruning and/or large diameter tree removals occurred. Additionally, SDG&E's current procedure for post-trim tree trim auditing includes whether the tree trim contractors adequately followed the utility's requirements and specifications for debris cleanup. If a tree were failed for debris, it can be inferred that some measure of woody debris was left on site.

### **III. SDG&E's Response to the Findings and Corrective Action for Initiative 8.2.3.3 Clearance**

<b>Initiative Number:</b>	8.2.3.3 Vegetation and Fuels Management- Clearance
<b>Finding:</b>	Failure to provide information consistent with the completion of all work identified in initiative 8.2.3.3

In its conclusion of the review of initiative 8.2.3.3 Vegetation and Fuels Management-Clearance, OEIS noted SDG&E did not provide information consistent with the completion of work identified in this target. To evidence completion of work, SDG&E provided in response to Question 19 of DR-260 an Excel sheet containing all activities where SDG&E performed enhanced clearing in 2023. SDG&E respectfully submits that the data provided in Data Request-260 adequately demonstrated all work was completed for this initiative target.

SDG&E believes that Energy Safety's conclusion is based on the mistaken consideration of clearances achieved only for trees trimmed to enhanced clearance and

failure to add the data on clearances achieved by the numbers of trees removed. Clearances related to this program were separated in the data, which demonstrates that clearances were achieved during the trimming of 8,855 trees (as reflected by Energy Safety's Audit Report), and clearances were also achieved for the removal of 4,597 trees; total clearances totaling the 13,452 reported by SDG&E. If a clearance was achieved through removal, the cell for trimming clearance was marked as N/A, and vice versa, to avoid a clearance being counted twice.

SDGE facilitated an informal conference call between SDG&E and Environmental Sciences Division on January 14, 2025 during which SDG&E reviewed the Excel data response to Question #19 in DR 260 which detailed the tree trimming and removal activities in 2023 which evidenced completion of the Clearance target.<sup>1</sup> During that call SDG&E demonstrated how specific filtering of the data sheet validated that SDG&E exceeded the target by completing clearance on 13,452 tree units compared to the 8,855 units identified in ESD's initial analysis of the data. ESD acknowledged it had not fully interpreted the filtered data in its initial review and informally agreed that the data SDG&E provided supports the completion of the work for this initiative target. SDG&E respectfully requests that Energy Safety revise its Audit Report to reflect this correction.

SDG&E recognizes the inherent complexity of the vegetation management data associated with some of its data request responses and will endeavor in the future to provide additional clarity where needed in the effort to avoid confusion or misinterpretation. SDG&E also appreciates the flexibility afforded in using the Informal Conference call option to answer questions and provide additional information.

#### **IV. SDG&E's Response to the Findings and Corrective Action for Initiative 8.2.5.1 Quality Assurance and Quality Control**

<b>Initiative Number:</b>	8.2.5.1 Quality Assurance and Quality Control
<b>Finding:</b>	Failure to provide information consistent with the completion of work identified in Initiative 8.2.5 Quality Assurance and Quality Control

In its conclusion of the review of Statement 22 of the SVM Audit, OEIS noted SDG&E did not provide information consistent with the completion of QA/QC activities for Memos and off-cycle patrols. Based on its analysis of the data provided, ESD determined that SDG&E audited 34% of the total Memo work orders, and 62% of off-cycle HFTD work orders. SDG&E submits that this is due to the timing cut-offs of the audit period and the inability to reflect work extended into 2024.

SDG&E respectfully contends ESD's analysis of the data provided does not fully account for all work orders reviewed and would like to clarify potential inconsistencies

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<sup>1</sup> Data Request 260, Question 19; attachment: "2023\_SMV\_OEIS\_DR260\_Q19.xlsx."

with the filtering of the audit activity as it relates to SDG&E's data as provided (See Question 28; attachment: "Memo and Off Cycle HFTD Audits.xlsx"). Specifically, some Memo and HFTD work orders were initiated in late 2023 and subsequently completed and audited in early 2024. This overlap may have led to discrepancies in the interpretation of the audit data. For example, if the audit activity date is extended to April 2024 to account for trees identified as memos in late 2023, the total count of completed audits increases to 2,280, representing 65% of Memo audits completed (compared to the 34% reported in the SVM). Separately, if HFTD work order audits are filtered by activity = 'Pre-Inspection Patrol' (Column C), and audit activity dates through April 2024 are included (Column N), the total HFTD audits completed increases to 88% (compared to the 62% reported).

Despite the comparative differences between the data SDG&E provided in response to Question 28 of DR-260, and ESD's analysis, SDG&E agrees with the 2023 SVM audit finding that the data fell short of providing information consistent with the completion of all work identified in Initiative 8.2.5 Quality Assurance and Quality Control.

As a corrective action, SDG&E will establish a method of tracking and validating the creation and completion of all audit work orders associated with Memos, and work generated during the HFTD off-cycle patrols. In future audits and data requests SDG&E will work closely with ESD's analytics team to refine and clarify the data filtering process to ensure all work orders are accurately accounted for.

## **V. SDG&E's Response to the Findings and Corrective Action for Initiative 8.2.6.1 Open Work Orders**

<b>Initiative Number:</b>	8.2.6.1 Open Work Orders
<b>Finding:</b>	Failure to provide information consistent with the completion of work identified in Initiative 8.2.6 Open Work Orders

In its conclusion of the review of Statement 23 of the SVM Audit, OEIS noted SDG&E did not provide information consistent with the completion of routine and priority work within stated schedules. SDG&E appreciates Energy Safety's recognition that "most" of both the routine and priority work was completed within 120 and 30 days, respectively, approximately 16% of routine and 2% of priority work was performed outside of that schedule. ESD further noted that work completion associated with routine and priority inspections initiated in late 2023 were not completed until the beginning of 2024.

SDG&E submits that it has met both the spirit and technical statements in its WMP, which provide that "[r]outine work is *generally* scheduled to be completed within 120 days of inspection, whereas priority work is *generally* scheduled to be completed within 30 days of inspection."<sup>2</sup> SDG&E's Vegetation Management Master Schedule is structured to

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<sup>2</sup> SDG&E's 2023-2025 Wildfire Mitigation Plan at 285.

provide a reasonable time-period to complete each activity annually within all VMAs that comprise the service territory. The ability to complete all required tree work within the scheduled timeframe for any specific VMA can be influenced by several factors, including but not limited to customer refusals, environmental review and restrictions, property access restrictions, external agency reviews, permit applications, etc. These additional factors that may impact work schedules are why SDG&E's work schedules are generalized rather than mandatory. Energy Safety also acknowledges that there is "some latitude in the time frame of completion."<sup>3</sup> SDG&E considers wildfire risk in prioritizing work, thus SDG&E generally disagrees with Energy Safety's speculation that not adhering to SDG&E's work timeframe guidelines could result in additional risk.<sup>3</sup>

SDG&E endeavors to anticipate schedule delays in advance where feasible through internal planning and scheduling by the Area Foresters and Contract Administrators. Efforts to prevent unnecessary delays to work completion may include proactive communication with customers, managing appropriate contractor resource levels, fostering positive working relationships with external stakeholders (e.g., cities, agencies, tribes), early permit initiation, and scheduling routine work outside bird nesting season. Additionally in 2023, the replacement and onboarding of a new tree trim contractor impacted tree operations resulting in delays to scheduled work activities.

SDG&E notes that its process of prioritizing work identified as having urgency enables timely completion of the riskiest conditions. Also, some of SDG&E's activities including detailed, off-cycle, targeted, and post-trim cursory inspections include inherent redundancy which also enables multiple opportunities to identify and respond to risk conditions.

SDG&E recognizes that achieving schedule objectives is necessary to meet the overall objectives of the WMP in preventing wildfire and unnecessary risk on the system and achieving compliance with other applicable regulations. As corrective action, SDG&E will modify how delayed work is monitored, tracked, and reported. Such action will consist of holding recurring and focused meetings with the tree contractors to review the status of all current and pending work, coordinating pre-emptive environmental reviews earlier in the annual schedule, initiating proactive letters to historical refusal customers, and working with the tree contractors to ensure proper crew allocation throughout the calendar year.

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<sup>3</sup> 2023 Substantial Vegetation Management Audit Report at A-26.

## **VI. Conclusion**

SDG&E appreciates the significant effort that Energy Safety put into the assessment of the implementation and execution of our 2023-2025 WMP vegetation management work.

Respectfully submitted,

/s/ Laura M. Fulton

Attorney for  
San Diego Gas and Electric Company