



April 21, 2025

To: San Diego Gas & Electric
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SUBJECT: Office of Energy Infrastructure Safety's Report on San Diego Gas & Electric's 2023 Substantial Vegetation Management Audit

Pursuant to the requirements of California Public Utilities Code section 8386.3(c)(5)(C), the Office of Energy Infrastructure Safety (Energy Safety) completed its final report on San Diego Gas & Electric's (SDG&E) 2023 Substantial Vegetation Management (SVM) audit. Energy Safety finds that SDG&E substantially complied with the substantial portion of the vegetation management requirements in its 2023-2025 Wildfire Mitigation Plan.

The attached report follows Energy Safety's publication of its SVM audit on December 31, 2024, and SDG&E's subsequent response on January 31, 2025. Pursuant to statutory requirements, a copy of this report is issued to SDG&E, published on Energy Safety's 2023 SVM Docket¹ and provided to the California Public Utilities Commission.

Sincerely,

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¹ All documents related to SDG&E's 2023 SVM audit are available on Energy Safety's e-filing under the "2023-SVM" docket and available here: (<https://efiling.energysafety.ca.gov/Lists/DocketLog.aspx?docketnumber=2023-SVM>)



OFFICE OF ENERGY INFRASTRUCTURE SAFETY

**2023 SUBSTANTIAL VEGETATION
MANAGEMENT AUDIT REPORT**

SAN DIEGO GAS & ELECTRIC

April 2025

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EXECUTIVE SUMMARY

The Office of Energy Infrastructure Safety (Energy Safety) completed an audit of San Diego Gas and Electric's (SDG&E) vegetation management commitments from its approved 2023-2025 Wildfire Mitigation Plan (WMP) on December 31, 2024.¹ The SDG&E 2023-2025 WMP had thirteen vegetation management initiatives in six programmatic areas.² In the SDG&E Substantial Vegetation Management Audit (SVM Audit), Energy Safety found that SDG&E did not provide information consistent with the completion of all work commitments for five of its 13 vegetation management initiatives.

SDG&E submitted its Corrective Action Plan (CAP) addressing the deficiencies identified in the SVM Audit on January 31, 2025.³ SDG&E's CAP sufficiently addressed four out of the five deficient initiatives by supplying additional information that demonstrated that either SDG&E completed all or the majority of the work, or that SDG&E completed other work which achieved the same program objective. As a result of this analysis of SDG&E's CAP, Energy Safety found that SDG&E substantially complied with a substantial portion of the vegetation management requirements in its 2023-2025 WMP for compliance year 2023.

¹ [Energy Safety's 2023 SVM Audit of SDG&E](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57786&shareable=true)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57786&shareable=true>).

² [SDG&E's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true) (Rev. #1, October 23, 2023)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true>).

³ [SDG&E's 2023 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57902&shareable=true)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57902&shareable=true>).

1. INTRODUCTION

Pursuant to Public Utilities Code section 8386.3(c)(5), Energy Safety must annually audit the vegetation management work performed by, or on behalf of, an electrical corporation. The SVM Audit shall specify any failure of the electrical corporation to fully comply with the vegetation management commitments in its Wildfire Mitigation Plan (WMP).⁴ Energy Safety then provides the SVM Audit to the electrical corporation and grants it a reasonable time to correct and eliminate any deficiency therein. The electrical corporation submits its response to the SVM Audit in a Corrective Action Plan (CAP). Following receipt and review of the electrical corporation's CAP, Energy Safety completes an analysis of the CAP and issues an Audit Report to the electrical corporation identifying whether it substantially complied with the substantial portion of the vegetation management requirements in the compliance year.^{5,6}

Energy Safety published the 2023 SDG&E SVM Audit on December 31, 2024.⁷ The Audit concluded that SDG&E did not perform all the work specified in five out of the 13 vegetation management initiatives in its 2023-2025 WMP. In response to the SVM Audit, SDG&E submitted its CAP on January 31, 2025.⁸ Energy Safety reviewed SDG&E's CAP and supporting information to determine whether it substantially complied with the substantial portion of their vegetation management requirements in its 2023-2025 WMP for compliance year 2023.

This document is Energy Safety's Report on the 2023 SVM Audit of SDG&E. The document is organized as follows:

- Section 2 is a summary of the 2023 SVM findings published in the December 31, 2024 audit.
- Section 3 includes Energy Safety's initiative level (3.1) and programmatic (3.2) compliance analysis of SDG&E's CAP and supporting documentation and information.
- Section 4 provides the basis for Energy Safety's conclusion that SDG&E substantially complied with the substantial portion of the vegetation management requirements in its 2023-2025 WMP.

⁴ Pub. Util. Code, § 8386.3(c)(5)(A).

⁵ Pub. Util. Code, § 8386.3(c)(5)(C).

⁶ [2024 Compliance Guidelines](#), Section 8.1, (September 2024), p. 13.

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57320&shareable=true>).

⁷ [Energy Safety's 2023 SVM Audit of SDG&E](#)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57786&shareable=true>).

⁸ [SDG&E's 2023 SVM Audit Corrective Action Plan](#)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57902&shareable=true>).

2. 2023 SVM AUDIT FINDINGS

The 2023 SVM Audit found that SDG&E performed all work in eight of the 13 initiatives and was deficient in the remaining five. Table 1 below is reproduced from Energy Safety's 2023 SVM Audit.⁹

Programmatic Area	Vegetation Management Initiative	Audit Finding
8.2.2. Vegetation Management Inspections	8.2.2.1 Vegetation Management Inspections	Did not complete all work
8.2.3. Vegetation and Fuels Management	8.2.3.1 Pole Clearing	Completed all work
8.2.3. Vegetation and Fuels Management	8.2.3.2 Wood and Slash Management	Did not complete all work
8.2.3. Vegetation and Fuels Management	8.2.3.3 Clearance	Did not complete all work
8.2.3 Vegetation and Fuels Management	8.2.3.4 Fall-In Mitigation	Completed all work
8.2.3. Vegetation and Fuels Management	8.2.3.5 Substation Defensible Space	Completed all work
8.2.3 Vegetation and Fuels Management	8.2.3.6 High-Risk Species	Completed all work
8.2.3 Vegetation and Fuels Management	8.2.3.7 Fire Resilient Right-of-Ways	Completed all work
8.2.3 Vegetation and Fuels Management	8.2.3.8 Emergency Response Vegetation Management	Completed all work
8.2.4 Vegetation Management Enterprise System	8.2.4.1 Vegetation Management Enterprise System	Completed all work
8.2.5 Quality Assurance and Quality Control	8.2.5.1 Quality Assurance and Quality Control	Did not complete all work
8.2.6 Open Work Orders	8.2.6.1 Open Work Orders	Did not complete all work
8.2.7 Workforce Planning	8.2.7 Workforce Planning	Completed all work

⁹ [Energy Safety's 2023 SVM Audit of SDG&E](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57786&shareable=true), pp. 4-5, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57786&shareable=true).

3. SVM COMPLIANCE ANALYSIS

Energy Safety must assess whether the electrical corporation substantially complied with the substantial portion of the vegetation management requirements in the compliance year.¹⁰ The determination of substantial compliance is based on an analysis of both the electrical corporation's compliance with each vegetation management initiative as well as the program overall.

The initiative level analysis includes:

- 1) **Achievement of Objective-** Determination of whether the electrical corporation's deficiencies, after considering its planned corrective actions, have not detracted from the electrical corporation's ability to achieve the objectives of its vegetation management programs; and
- 2) **Good Faith Effort-** Determination of whether the electrical corporation's effort to fulfill the vegetation management requirement constituted a good faith effort to comply with the vegetation management requirements in the approved WMP.

The programmatic level analysis includes:

- 3) **Completeness-** Determination of whether the electrical corporation completed the large majority of the vegetation management requirements in its approved WMP.

Energy Safety synthesizes the initiative and programmatic analyses to formulate the conclusion regarding substantial compliance with the substantial portion of the vegetation management requirement in SDG&E's WMP, which is described in Section 4.

¹⁰ Pub. Util. Code, § 8386.3(c)(5)(C).

3.1 Initiative Level Assessment

8.2.2 Vegetation Management Inspections

Summary of Initiative Work Commitments and Activities

The purpose of this initiative was to describe the “Inspections of vegetation around and adjacent to electrical facilities and equipment that may be hazardous by growing, blowing, or falling into electrical facilities or equipment.”¹¹ SDG&E’s 2023 vegetation inspection activities included Detailed Vegetation Inspections of 516,282 tree units in all 133 Vegetation Management Areas (VMA) in SDG&E’s service territory, exceeding its target of 485,400 tree units.¹² SDG&E also conducted Off-Cycle Patrol Inspection of 261,510 tree units across all 106 VMAs and performed two Off-Cycle inspections annually in HFTD areas.¹³ Finally, SDG&E also committed to Targeted Species Patrols which were meant to ensure two annual inspections of century plants and three annual inspections of bamboo plants in its inventory. Energy Safety found that SDG&E provided documentation consistent with the completion of work identified for Detailed Inspections and Off-Cycle Patrol Inspections, but the documentation provided for Targeted Species Patrols for Century and bamboo plants only demonstrated that a portion of this work was completed. In its data request response, SDG&E explained that the shortfall was due to a record-keeping issue in which targeted species inspections do not receive a separate work order when they coincide with an annual routine inspection.¹⁴ SDG&E stated that the inspection for the targeted species would have occurred during the routine inspection, fulfilling the commitments in the WMP.

2023 SVM Audit Finding

Targeted Species Patrols (Century Plant): SDG&E did not provide documentation demonstrating that each of its inventoried century plants were inspected twice in 2023.¹⁵ The documentation provided demonstrated that of the 63,616 inventory Century Plants, 68% had two inspection dates, while 32% had only one inspection date.

¹¹ [Energy Safety’s 2023-2025 Wildfire Mitigation Plan Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (December 6, 2022), p. A-24 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

¹² [Energy Safety’s 2023 SVM Audit of SDG&E](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57786&shareable=true), pp. A2-A5, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57786&shareable=true).

¹³ [Energy Safety’s 2023 SVM Audit of SDG&E](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57786&shareable=true), pp. A5-A6, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57786&shareable=true).

¹⁴ Data Request 260, Question 10; attachment: “SDGE Response Energy Safety-DR-260.pdf.”

¹⁵ [Energy Safety’s 2023 SVM Audit of SDG&E](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57786&shareable=true), pp. A6-A7, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57786&shareable=true).

Targeted Species Patrols (Bamboo): SDG&E committed to conducting annual targeted species patrols for bamboo in the summer and fall. These inspections were in addition to detailed inspections, which inspected all vegetation in its system, such that each inventoried bamboo would be inspected three times each year.¹⁶ However, SDG&E could not provide documentation that its entire bamboo inventory was inspected three times in 2023.¹⁷ Further, SDG&E stated that although its Memo (priority) process continued during all detailed VMA inspection activities throughout the summer, the bamboo patrol normally conducted in the summer did not occur in 2023 in an effort to avoid impacting other routine scheduled inspections.¹⁸

SDG&E's CAP Response

Targeted Species Patrols (Century Plant): In its CAP, SDG&E stated that its targeted species patrols for Century plants took place within a compressed timeframe (~2 months) during the spring of 2023 when the plant typically blooms. Consequently, in several Vegetation Management Areas (VMAs), Century plant patrols were conducted in the same month as detailed inspections in 2023. Due to this overlap, SDG&E did not record the two different inspection activities as distinct and separate.¹⁹

SDG&E also stated in its CAP that “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.”²⁰

Targeted Species Patrols (Bamboo): In its CAP, SDG&E stated that because bamboo patrols may occur within the same month as detailed inspections in certain VMAs, the bamboo in these VMAs were not inspected under a separate, unique dispatch work order that would represent a separate inspection activity. SDG&E stated that all bamboo records were updated during detailed inspections, but only bamboo that required work were updated during the targeted species patrol, therefore, not all bamboo records received multiple inspection records.²¹

¹⁶ [SDG&E's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true) (Rev. #1, October 23, 2023) p. 267
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true>).

¹⁷ [Energy Safety's 2023 SVM Audit of SDG&E](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57786&shareable=true), p. A7
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57786&shareable=true>).

¹⁸ Data Request 260, Question 11; attachment: “SDGE Response Energy Safety-DR-260.pdf.”

¹⁹ [SDG&E's 2023 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57902&shareable=true), p. 2,
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57902&shareable=true>).

²⁰ [SDG&E's 2023 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57902&shareable=true), p. 2,
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57902&shareable=true>).

²¹ [SDG&E's 2023 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57902&shareable=true), p. 3,
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57902&shareable=true>).

SDG&E also stated that its “...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.”²²

Corrective Measures: As a corrective measure, SDG&E stated in its CAP that, moving forward, it would “modify and stagger” its targeted species patrols schedules for Century Plant and bamboo and its detailed inspections to avoid overlap between the programs and ensure separate and distinct work orders are created for each inspection activity to effectively evidence each type of inspection.^{23, 24} SDG&E also stated that in an effort to avoid confusion regarding the parameters of its targeted species patrol of bamboo in future compliance years, it would include updates to the language describing its targeted species patrol program in its 2026-2028 WMP.²⁵

Analysis of Substantial Vegetation Management Compliance with the 2023-2025 WMP

Criteria 1: Achievement of Objective

Energy Safety’s 2023 SVM Audit found that SDG&E completed all work described under its Detailed Inspections and Off-Cycle Patrol programs. While these programs were not limited to the inspection of Century plants or bamboo, the programs identified vegetation compliance issues which were associated with all plant species throughout SDG&E’s territory. SDG&E agreed that it could not demonstrate that each Century plant in its inventory was inspected twice, nor each bamboo plant inspected three times, in 2023. However, SDG&E’s other programs, which have an overlap in scope, served to identify wildfire risk and met the objective of this initiative by inspecting for hazardous vegetation along SDG&E’s electrical infrastructure. SDG&E’s documentation indicated that it exceeded its quantitative targets for these programs.

²² [SDG&E’s 2023 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57902&shareable=true), p. 3, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57902&shareable=true).

²³ [SDG&E’s 2023 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57902&shareable=true), p. 3, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57902&shareable=true).

²⁴ [SDG&E’s 2023 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57902&shareable=true), p. 2, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57902&shareable=true).

²⁵ [SDG&E’s 2023 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57902&shareable=true), p. 3, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57902&shareable=true).

SDG&E's CAP response reiterated that targeted species patrols often overlap with routine detailed inspections in several VMAs. When they overlap, only one work order is issued. However, SDG&E's 2023-2025 WMP indicates that targeted species patrols are "in addition to the routine detailed inspection that occurs within each VMA's scheduled month."²⁶ Therefore, combining detailed and targeted species inspections doesn't satisfy the work commitment in the WMP because SDG&E would only have completed one inspection (one combined detailed and targeted species inspection) when it had committed to performing two (one detailed inspection and one targeted species inspection). However, SDG&E documented two targeted species inspections for the majority of its bamboo and century plants in its inventory and stated that the detailed and off-cycle inspections would have been sufficient to manage grow-in risk for these high-risk species. Energy Safety agrees that the shortfall in species specific inspections would not contribute to unnecessary risk on the system, especially where inspections coincide with the growth season for high-risk species. Furthermore, SDG&E's CAP indicated that it plans to implement new practices moving forward which will allow for comprehensive tracking of its targeted species inspection work and will provide the data needed to determine an appropriate frequency for inspection of high-risk species.

Given the completion of all its detailed and patrol inspection work and the majority of the targeted species inspection work, Energy Safety found that SDG&E achieved the objective of Initiative 8.2.2 Vegetation Management Inspections.

Criteria 2: Good Faith Effort

SDG&E's CAP indicated that SDG&E made a good faith effort to complete the targeted species patrol work as described in its 2023-2025 WMP, but that 2023 scheduling and recordkeeping procedures led to incomplete documentation of work. While Energy Safety cannot verify how much of the undocumented work was actually performed, the documentation for detailed inspections and off-cycle patrol work provided by SDG&E demonstrated that it made a good faith effort to meet the objective of this initiative by inspecting for hazardous vegetation along its electrical infrastructure multiple times during the compliance year in HFTD.

Initiative Level Determination

SDG&E's CAP indicated that SDG&E's 2023 targeted species patrol work was completed as described in its 2023-2025 WMP. While SDG&E could not provide documentation to demonstrate that all targeted species work was preformed, Energy Safety was able to confirm that in some VMAs targeted species work would have overlapped with routine inspection work and targeted species would have received inspections as a part of those work orders. SDG&E met the objective of the initiative by exceeding its quantitative targets and completing

²⁶ [SDG&E's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true) (Rev. #1, October 23, 2023) p. 267
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true>).

all narrative commitments for both its detailed and patrol inspection programs in 2023, which have overlapping scope with the targeted species patrols. Furthermore, the corrective measures SDG&E will implement should allow SDG&E to collect and provide appropriate information to document work on this commitment in future compliance years. The information provided in its CAP response demonstrated that SDG&E met the objective overall and made a good faith effort to complete all work.

Energy Safety recognizes that SDG&E should prioritize programs to optimize removal of risk from its system. However, SDG&E's decision not to perform its summer bamboo patrol was a divergence from the work described in SDG&E's 2023-2025 WMP. Energy Safety requests that, in future years, SDG&E communicate changes to the work described in its approved WMPs in advance and provide evidence justifying why such actions are necessary to mitigate overall risk to its system. Energy Safety notes that it must audit work commitments in its WMP and will continue to request documentation demonstrating that SDG&E completed two annual inspections for Century plant and three inspections for bamboo unless and until its WMP is revised.

While SDG&E was unable to produce documentation supporting completion of all work commitments for targeted species patrols, SDG&E completed all work described in two of the three vegetation inspection programs included in its 2023-2025 WMP and was able to demonstrate that most of its targeted species patrol work was completed. Although SDG&E fell short of its commitments for targeted species inspections, Energy Safety found that SDG&E completed a substantial portion of the work described in this initiative. Therefore, Energy Safety found that SDG&E substantially complied with this initiative.

8.2.3.2 Vegetation and Fuels Management: Wood and Slash Management

Summary of Initiative Work Commitments and Activities

The purpose of this initiative was to take actions “to manage all downed wood and ‘slash’ generated from vegetation management activities.”²⁷ SDG&E’s 2023 wood and slash management activities included a fuels management target of 500 poles. SDG&E also included narrative commitments to remove wood and slash debris following vegetation management activities, increase the amount of material diverted to a recycling facility, and remove all debris from channels and banks of water courses. SDG&E was able to provide documentation supporting completion of its quantitative target for fuels management, removal from channels and water courses, and diverting 62% of its wood and slash material to recycling facilities. SDG&E was unable to provide sufficient documentation demonstrating that it removed wood and slash from its vegetation management activities in 2023.

2023 SVM Audit Finding

SDG&E stated in its 2023-2025 WMP that most wood and slash debris resulting from routine trimming and removal activities was chipped on site and removed from properties the same day, unless requested otherwise.²⁸ While SDG&E provided files for tree trimming and removal activities, and indicated that its standard operating procedures included instruction to remove debris except when a customer requests it be left on site, SDG&E did not provide documentation demonstrating that all wood and slash debris generated in 2023 was managed in this way.²⁹ Therefore SDG&E did not provide information consistent with the completion of work identified in initiative 8.2.3.2 Wood and Slash Management.

SDG&E’s CAP Response

In its CAP, SDG&E stated that its wood and slash debris removal program does not record at the tree-level if wood and slash debris management work was completed. However, it is standard protocol for SDG&E’s vendors to remove wood and slash debris as described in its 2023-2025 WMP and that terms are included in SDG&E’s vendor contracts which require SDG&E’s vendors to perform such work. Further, SDG&E stated that it currently has audit

²⁷ [Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (December 6, 2022), p. A-24 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

²⁸ [SDG&E’s 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true) (Rev. #1, October 23, 2023) p. 274 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true).

²⁹ Data Request 260, Question 16; attachment: “SDGE Response Energy Safety-DR-260.pdf.”

programs in place which assesses whether tree trim vendors adequately followed SDG&E's wood and slash debris management procedures.³⁰

SDG&E also stated in its CAP that it would "...explore the feasibility of updating [its] electronic tree records so that tree crews could document the cases where wood and slash debris was left on site."³¹

Analysis of Substantial Vegetation Management Compliance with the 2023-2025 WMP

Criteria 1: Achievement of Objective

While SDG&E's CAP stated that it included wood and slash management procedures as requirements in its vendor contracts and assessed the compliance of its vendor's wood and slash management work during post-trim auditing activities, SDG&E provided no documentation verifying that the work was completed.³² Without documentation tracking wood and slash management work at the tree level, Energy Safety could not verify that wood and slash generated by vegetation management activities was managed in accordance with SDG&E's procedures. Further, without tracking the date wood and slash management work was completed, Energy Safety could not verify that all wood and slash was removed the same day as tree work per SDG&E's commitments in its 2023-2025 WMP. The improper management of wood and slash creates an unnecessary increase of ground fuels which could exacerbate wildfire spread. Therefore, it is critical for SDG&E to keep accurate records of its wood and slash management work. Energy Safety found that SDG&E's recordkeeping deficiencies detracted from SDG&E's ability to achieve this initiative's objective which is to manage all wood and slash management work.

Criteria 2: Good Faith Effort

SDG&E's establishment of wood and slash management procedures, inclusion of the procedure's requirements in its vendor contracts, and completion of audits verifying the management of some 2023 wood and slash management work demonstrate that SDG&E made an effort to manage downed wood and slash. However, without protocols which document the removal of wood and slash at the tree level, neither SDG&E nor Energy Safety can verify that the work was completed. To demonstrate completion of this work,

³⁰ [SDG&E's 2023 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57902&shareable=true), p. 4, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57902&shareable=true).

³¹ [SDG&E's 2023 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57902&shareable=true), p. 4, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57902&shareable=true).

³² [Energy Safety's 2023 SVM Audit of SDG&E](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57786&shareable=true), p. A22-A25 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57786&shareable=true).

Energy Safety needs SDG&E to further mature its wood and slash management program by recording wood and slash management work for all work orders which would allow SDG&E to ensure all wood and slash management work is completed in accordance with its procedures.

Initiative Level Determination

SDG&E was not able to demonstrate that all wood and slash debris resulting from routine trimming and removal activities were chipped on site and removed from properties the same day, unless requested otherwise. SDG&E was able to document the completion of two other narrative statements in its 2023-2025 WMP pertaining to its Wood and Slash Management Initiative, demonstrating that some work for wood and slash removal was completed. This included the removal of wood and slash from channels and the banks of watercourses and the transportation of 62% of the wood and slash generated in 2023 to recycling facilities.³³ SDG&E was also able to demonstrate that it exceeded its quantitative target for Fuels Management by brushing 514 poles for extended clearance in 2023.³⁴ However, because the objective of the initiative is to “to manage all downed wood and ‘slash’ generated from vegetation management activities,”³⁵ Energy Safety finds that SDG&E did not substantially comply with this initiative. Energy Safety expects SDG&E to improve its recordkeeping of wood and slash management work for all work orders to demonstrate compliance in future years.

³³ [Energy Safety's 2023 SVM Audit of SDG&E](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57786&shareable=true), pp. A12-A13, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57786&shareable=true).

³⁴ [Energy Safety's 2023 SVM Audit of SDG&E](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57786&shareable=true), p. A11, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57786&shareable=true).

³⁵ [Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (December 6, 2022), p. A-24 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

8.2.3.3 Vegetation and Fuels Management: Clearance

Summary of Initiative Work Commitments and Activities

The purpose of this initiative was to take actions “after inspection to ensure that vegetation does not encroach upon electrical equipment and facilities, such as tree trimming”.³⁶ SDG&E’s 2023 WMP included a quantitative target of 11,200 tree units for clearance activities.³⁷ While SDG&E provided an Excel file of completed clearance work, Energy Safety’s analysis only indicated that 8,855 tree units were completed and concluded that not all work was completed for this target. SDG&E also included a narrative commitment to trim or remove approximately 30% of inventory trees in HTFD and provide enhanced clearances for approximately 5%.³⁸ SDG&E provided documentation showing that it completed trims and removals of 35% of HTFD inventory trees and provided enhanced clearances on 15%, exceeding the commitment of the narrative statement.

2023 SVM Audit Finding

In its 2023-2025 WMP, SDG&E included a target to complete clearance work on 11,200 tree units in 2023.³⁹ However, after review of an Excel file provided by SDG&E containing 2023 clearance work records, Energy Safety determined that SDG&E had only completed clearance work on 8,855 tree units.⁴⁰ Energy Safety determined this by reviewing work completion dates in the Excel file and filtering out any “N/A” and blank line items in columns labeled “TT_ActivityDate,” “TT_Condition Code,” and “TT_WorkOrderID.” “TT” in these files referred to tree trimming activities. Therefore, SDG&E did not provide information consistent with the completion of all work identified in initiative 8.2.3.3 Clearance.

SDG&E’s CAP Response

In its CAP, SDG&E provided information regarding the fields and attributes contained in the Excel file which Energy Safety used in the 2023 audit to assess SDG&E’s completion of its

³⁶ [Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (December 6, 2022), p. A-24 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

³⁷ [SDG&E's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true) (Rev. #1, October 23, 2023) pp. 257-258 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true). This table was modified for Energy Safety’s data request to include statements and targets relevant to 2023.

³⁸ [SDG&E's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true) (Rev. #1, October 23, 2023) p. 259 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true).

³⁹ [SDG&E's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true) (Rev. #1, October 23, 2023) pp. 257-258 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true). This table was modified for Energy Safety’s data request to include statements and targets relevant to 2023.

⁴⁰ [Energy Safety's 2023 SVM Audit of SDG&E](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57786&shareable=true), p. A14, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57786&shareable=true).

clearance target. In its CAP, SDG&E stated that “[it] believes that Energy Safety’s conclusion [was] based on the mistaken consideration of clearances achieved only for trees trimmed to enhanced clearance and [failed] to add the data on clearances achieved by the numbers of trees removed.”⁴¹ Further, SDG&E stated “[i]f a clearance was achieved through removal, the cell for trimming clearance [in the Excel file] was marked as N/A, and vice versa, to avoid a clearance being counted twice.”⁴² SDG&E reported that clearances were achieved for 8,855 tree units through trimming and 4,597 tree units by removals, with combined clearances on 13,452 tree units total. The combined clearances achieved through removals and trimming would exceed the target.

Analysis of Substantial Vegetation Management Compliance with the 2023-2025 WMP

Criteria 1: Achievement of Objective

Energy Safety reanalyzed the Excel file provided in response to data request 260⁴³ using the explanation of cell columns provided in SDG&E’s CAP and found that SDG&E did complete clearance work on 13,452 tree units in 2023 when trimming and removal activities are combined. Thus, Energy Safety found that SDG&E exceeded its 2023 clearance target, and that there were no deficiencies related to this initiative that detracted from SDG&E’s ability to achieve the objective of this initiative.

Criteria 2: Good Faith Effort

The additional information supplied in SDG&E’s CAP indicated that SDG&E performed all work commitments for this initiative.

Initiative Level Determination

SDG&E provided additional information in its CAP explaining column headings in the Excel files it provided and clarifying how it documents clearance work therein. Using this information, Energy Safety conducted a re-analysis of the Excel files provided for the audit, which then demonstrated that SDG&E exceeded its WMP target for Clearances, and that there were no deficiencies related to this initiative.

⁴¹ [SDG&E’s 2023 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57902&shareable=true), pp. 4-5, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57902&shareable=true).

⁴² [SDG&E’s 2023 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57902&shareable=true), pp. 4-5, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57902&shareable=true).

⁴³ Data Request 260, Question 19; attachment: “2023_SMV_OEIS_DR260_Q19.xlsx.”

SDG&E's CAP response acknowledged the complexity of the data and committed to providing additional clarity in its data request responses in the future to avoid future misinterpretations of its vegetation management data.

8.2.5.1 Quality Assurance and Quality Control

Summary of Initiative Work Commitments and Activities

The purpose of this initiative was to describe the “Establishment and function of audit process to manage and confirm work completed by employees or contractors, including packaging QA/QC information for input to decision-making and related integrated workforce management processes.”⁴⁴ SDG&E's 2023 WMP included narrative commitments to conduct post-trim QA/QC activities 6-8 months after detailed inspections which serve as mid-cycle patrols of vegetation encroachment⁴⁵ and additional QA/QC scoping of trees along all lines.⁴⁶ SDG&E also included a narrative commitment regarding the randomized, representative sampling of vegetation management activities.⁴⁷ SDG&E provided documentation showing that it completed mid-cycle post-trim QA/QC activities and additional QA/QC scoping and related mitigation activities, thereby demonstrating completeness of work associated with these statements. However, SDG&E did not provide information consistent with the completion of all work associated with random QA/QC sampling.⁴⁸

2023 SVM Audit Finding

Energy Safety reviewed the Excel files SDG&E provided regarding the results of its vegetation management audits for off-cycle patrols, Memo inspections, pre-inspection and tree trim audits, and pole clearing inspections. Sufficient documentation was provided supporting QA/QC work for pole clearing, pre-inspections, and tree trim activities but not for Memos or off-cycle patrols. Energy Safety found that SDG&E failed to audit 100% of its HFTD Off-Cycle Patrol and Memo work orders per its commitments in its 2023-2025 WMP.⁴⁹ Therefore, SDG&E

⁴⁴ [Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (December 6, 2022), p. A-25 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

⁴⁵ [SDG&E's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true) (Rev. #1, October 23, 2023) p. 265 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true).

⁴⁶ [SDG&E's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true) (Rev. #1, October 23, 2023) p. 281 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true).

⁴⁷ [SDG&E's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true) (Rev. #1, October 23, 2023) p. 282 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true).

⁴⁸ [Energy Safety's 2023 SVM Audit of SDG&E](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57786&shareable=true), pp. A23-A25, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57786&shareable=true).

⁴⁹ [Energy Safety's 2023 SVM Audit of SDG&E](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57786&shareable=true), pp. A23-A25, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57786&shareable=true).

did not provide information consistent with the completion of work identified in Initiative 8.2.5 Quality Assurance and Quality Control.

SDG&E's CAP Response

In its CAP, SDG&E stated that some Memo and HFTD Off-Cycle Patrol work orders that were initiated in late 2023 were audited in early 2024. SDG&E stated that if the audit activity date was extended to April 2024 to account for work orders created in late 2023, then the total count would increase to 88% of HFTD Off-Cycle Patrol and 65% of Memo work order audits completed, respectively.⁵⁰ Regardless of this extended audit period, SDG&E stated that “[it] 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.”⁵¹

SDG&E also stated in its CAP that “...[it] 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.”⁵² Lastly, SDG&E stated that “[i]n 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.”⁵³

Analysis of Substantial Vegetation Management Compliance with the 2023-2025 WMP

Criteria 1: Achievement of Objective

SDG&E’s CAP response states that some 2023 HFTD Off-Cycle Patrol and Memo work orders were audited in Q1 of 2024. The data SDG&E provided in response to question 28 of Data Request 260 substantiates the claim that some 2023 work orders were audited in 2024. Energy Safety agreed that this was reasonable and conducted a re-analysis of the data allowing for QA/QC work orders completed in Q1 of 2024 which audited work completed in Q4 of 2023. This analysis showed that an “audit activity” date was not recorded for 500 of 3601 work orders, demonstrating that only 86% of Off-Cycle Patrol and Memo work orders were completed in HFTD areas.⁵⁴ SDG&E’s failure to audit 100% of the work in HFTD per its WMP

⁵⁰ [SDG&E’s 2023 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57902&shareable=true), pp. 5-6, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57902&shareable=true).

⁵¹ [SDG&E’s 2023 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57902&shareable=true), p. 6, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57902&shareable=true).

⁵² [SDG&E’s 2023 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57902&shareable=true), p. 6, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57902&shareable=true).

⁵³ [SDG&E’s 2023 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57902&shareable=true), p. 6, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57902&shareable=true).

⁵⁴ Data Request 260, Question 28; attachment: “Memo and Off Cycle HFTD Audits.xlsx.”

commitment detracted from SDG&E's ability to ensure all HFTD Off-Cycle Patrol and Memo work orders were properly executed, which could contribute to unnecessary wildfire risk on SDG&E's system. However, despite the shortfall of HFTD work order audits, SDG&E completed all other QA/QC commitments in its WMP, thereby achieving the objective of this initiative.

Criteria 2: Good Faith Effort

The information SDG&E provided indicated that some audits were not conducted in 2023 due to inaccessibility of the audit location, customer refusals, or unspecified "exceptions."⁵⁵ It was unclear from the information provided by SDG&E's that all of the incomplete HFTD Off-Cycle Patrol and Memo work order audits were due to circumstances outside of SDG&E's control. Furthermore, many audits rolled over into the 2024 compliance year for work orders completed in the 2023 compliance year. However, if all audits for work orders completed in 2023 are accounted for, regardless of the completion year for the audit itself, SDG&E audited 86% of work orders in HFTD (short of 100%) but exceeded its target number of random inspections for pre-inspection and tree trim activities and pole clearing. SDG&E also completed post-trim "mid-cycle" patrols and scoping activities associated with commitments in its WMP. For that reason, Energy Safety found that SDG&E made a good faith effort to complete work commitments associated with quality assurance and quality control in 2023.

Initiative Level Determination

SDG&E's 2023 quality assurance and quality control activities included a 12-15% audit of all 2023 pre-inspection, tree trim and pole clearing activities, a post trim audit which consisted of a cursory vegetation inspection along all overhead lines in each of SDG&E's VMAs, additional tree inspections for some vegetation management activities,⁵⁶ and an audit of 100% of its HFTD off-cycle Patrol and Memo work orders.⁵⁷ Energy Safety's 2023 audit found that SDG&E provided information consistent with the completion of all work related to its auditing of pre-inspection, tree trim and pole clearing activities, post trim cursory vegetation inspections, and additional tree inspection audit work.⁵⁸ Although SDG&E fell short of its commitment to audit 100% of its HFTD Off-Cycle Patrol and Memo work orders, Energy Safety found that SDG&E completed a substantial portion of the work described in this initiative. SDG&E's CAP included a commitment to "establish a method of tracking and validating the creation and completion of all audit work orders associated with Memos, and work generated

⁵⁵ Data Request 260, Question 28; attachment: "2023_SMV_OEIS_DR260_Q28_REDACTED.pdf."

⁵⁶ [SDG&E's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true) (Rev. #1, October 23, 2023) p. 265
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true>).

⁵⁷ [Energy Safety's 2023 SVM Audit of SDG&E](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57786&shareable=true), pp. A23-A25,
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57786&shareable=true>).

⁵⁸ [Energy Safety's 2023 SVM Audit of SDG&E](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57786&shareable=true), pp. A22-A25,
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57786&shareable=true>).

during the HFTD off-cycle patrols,”⁵⁹ demonstrating program maturity. Because SDG&E completed the majority of work described within this initiative, Energy Safety found that SDG&E substantially complied with this initiative.

8.2.6.1 Open Work Orders

Summary of Initiative Work Commitments and Activities

The objective of this initiative was to describe the “Actions taken to manage the electrical corporation’s open work orders resulting from inspections that prescribe vegetation management activities.”⁶⁰ SDG&E’s 2023 WMP included a narrative commitment to complete all routine work orders within 120 days of inspection and all priority work within 30 days.⁶¹ SDG&E provided Excel files of its routine and priority work, while most of the work was completed within the stated time-frames, 16% (20,742 instances) of routine work was completed outside the 120 day commitment and 2% (1,960 instances) of the priority work was completed outside the 30 day commitment. The WMP language states that work is “generally scheduled to be completed” within 120 and 30 days, implying some latitude in the time frame of completion. However, the 120- and 30-day timeframes were intended to meet the overall objective of the WMP, which was the prevention of wildfire ignition risk.

2023 SVM Audit Finding

Energy Safety reviewed the documentation provided by SDG&E and found that it did not complete all of its routine work within 120 days and priority work within 30 days. Therefore, SDG&E did not provide information consistent with the completion of work identified in Initiative 8.2.6 Open Work Orders.

SDG&E’s CAP Response

In its CAP, SDG&E stated that it met “both the spirit and technical statements in its WMP” and that its “Vegetation Management Master Schedule is structured to provide a reasonable time-period to complete each activity annually within all VMAs that comprise the service territory.”⁶² Further, SDG&E stated that work schedules could be influenced and delayed by

⁵⁹ [SDG&E’s 2023 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57902&shareable=true), p. 6, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57902&shareable=true).

⁶⁰ [Energy Safety’s 2023-2025 Wildfire Mitigation Plan Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (December 6, 2022), p. A-25 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

⁶¹ [SDG&E’s 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true) (Rev. #1, October 23, 2023) p. 285 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true).

⁶² [SDG&E’s 2023 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57902&shareable=true), pp. 6-7, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57902&shareable=true).

customer refusals, environmental review requirements and other restrictions which is why its work schedules are generalized rather than mandatory.⁶³ SDG&E also referred to Energy Safety's 2023 SVM Audit in its CAP which stated that there is "some latitude in the time frame of completion."⁶⁴ SDG&E stated that because "[it] considers wildfire risk in prioritizing work..." SDG&E generally disagrees with Energy Safety's speculation that not adhering to SDG&E's work timeframe guidelines could result in additional risk.⁶⁵

Lastly, SDG&E stated that:

[it] 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.⁶⁶

Analysis of Substantial Vegetation Management Compliance with the 2023-2025 WMP

Criteria 1: Achievement of Objective

The delayed mitigation of hazardous trees identified for routine and priority work detracted from SDG&E's ability to reduce wildfire risk because it extended the length of time trees with elevated risk of striking SDG&E's electrical infrastructure threatened its facilities. However, in 2023, SDG&E completed a majority of the work within the committed timeframes: 84% of routine work orders and 98% of priority work. Additionally, mitigation work was ultimately completed to address all of the routine and priority tree work, with work orders associated with inspections in the fourth quarter of 2023 completed in 2024. SDG&E indicated in its CAP that it plans to implement new procedures to address the issues that caused delays in vegetation management work in 2023, demonstrating program maturity.

⁶³ [SDG&E's 2023 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57902&shareable=true), pp. 6-7, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57902&shareable=true).

⁶⁴ [Energy Safety's 2023 SVM Audit of SDG&E](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57786&shareable=true), p. A26, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57786&shareable=true).

⁶⁵ [SDG&E's 2023 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57902&shareable=true), p. 7, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57902&shareable=true).

⁶⁶ [SDG&E's 2023 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57902&shareable=true), p. 7, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57902&shareable=true).

SDG&E's WMP states that "Routine 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."⁶⁷ Energy Safety recognizes that this language allows SDG&E some latitude in its scheduling of work to mitigate tree risk and to achieve the objective as written; however, delaying priority work does not meet the intention of the initiative, which is to reduce wildfire risk. Although SDG&E completed the majority of work within the timelines specified in its 2023-2025 WMP, the instances of delayed work detracted from SDG&E's reduction of wildfire risk. Energy Safety agrees that by implementing the corrective measures described in its CAP to reduce the amount of time it takes SDG&E to complete routine and priority work orders, will mature SDG&E's vegetation management program.

Criteria 2: Good Faith Effort

SDG&E's CAP indicated that although SDG&E made a good faith effort to complete its routine and priority work orders within the timeframes stated in its 2023-2025 WMP, situations outside of SDG&E's control such as customer refusals, environmental review requirements and other restrictions prohibited SDG&E from completing the work within the stated timeframes. However, SDG&E must implement protocols to ensure that vegetation risk is mitigated quickly to minimize the potential for wildfire ignition. In consideration of SDG&E's commitments to develop such protocols in its CAP, SDG&E has indicated that it has made a good faith effort to address situations which delayed the completion of work orders in 2023.

Initiative Level Determination

Energy Safety expects that SDG&E will mature its routine and priority tree programs by developing procedures to complete tree work in a timely and efficient manner. Energy Safety recognizes that completion of work orders may be constrained by situations outside of SDG&E's control (e.g., issues with access or safety). Energy Safety requests that SDG&E provide details in future data submittals regarding those constraints and how SDG&E works to resolve them. However, because 84% and 98% of routine and priority work orders were completed within SDG&E's stated timeframes, respectively, and because the work orders were ultimately completed, Energy Safety found that SDG&E substantially complied with this initiative.

⁶⁷ [SDG&E's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true) (Rev. #1, October 23, 2023) p. 285
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true>).

3.2 Programmatic Assessment

Energy Safety's SVM Audit, dated December 31, 2024, found that SDG&E completed all work in eight of the 13 initiatives in its 2023-2025 WMP and was deficient in five. SDG&E's CAP, dated January 31, 2025, sufficiently addressed four of the deficient initiatives by supplying additional information which demonstrated that either SDG&E completed all or the majority of the work, or that SDG&E completed other work which overlapped with the deficiency and achieved the same program objective. SDG&E was not able to provide sufficient documentation demonstrating it completed one of the initiatives, Wood and Slash Management.

Energy Safety identified recordkeeping and documentation issues within several of SDG&E's vegetation management programs that led to the initial Audit findings. Energy Safety expects SDG&E to implement the corrective measures detailed in its CAP to address the recordkeeping deficiencies identified in its targeted species patrol, wood and slash management, and quality assurance/quality control programs, and provide more detailed metadata in response to future Energy Safety data requests to avoid misinterpretation of information. Finally, Energy Safety expects SDG&E to implement the protocols it committed to in its CAP response to ensure that routine and priority work orders for tree mitigation are completed in timeframes that minimize risk on its system.

Overall, Energy Safety finds that SDG&E has completed the majority of the work described in its 2023-2025 WMP and where it has fallen short, it has identified deficiencies in its program and begun to take actions to correct these deficiencies. Therefore, Energy Safety finds that programmatically, SDG&E performed the large majority of the work described in its 2023-2025 WMP.

4. Conclusion

As discussed in the preceding sections, in 2023 SDG&E's vegetation management program suffered from shortfalls that compromised its ability to reduce risk. However, based on the analysis discussed in Section 3, Energy Safety concluded that SDG&E substantially complied with the substantial portion of the vegetation management requirements in its 2023-2025 WMP.

DATA DRIVEN FORWARD-THINKING INNOVATIVE SAFETY FOCUSED



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