



April 22, 2025

Lena McMillin  
Team Lead, Wildfire Mitigation Program Compliance  
San Diego Gas & Electric Company  
8316 Century Park Court, CP32F  
San Diego, CA 92123

## NOTICE OF VIOLATION

Ms. McMillin:

Pursuant to Public Utilities Code section 326 and Government Code section 15475.1, the Office of Energy Infrastructure Safety (Energy Safety) has conducted an inspection of work completed by San Diego Gas & Electric Company (SDG&E) in accordance with its 2024 Wildfire Mitigation Plan (WMP) and determined the existence of a violation. Energy Safety therefore issues SDG&E a Notice of Violation (NOV), identifying noncompliance with an approved WMP or any law, regulation, or guideline within the authority of the Office.<sup>1</sup>

On March 25, 2025, Energy Safety conducted an inspection of SDG&E's WMP initiatives in the vicinity of the city of Alpine, California. The inspection report is enclosed herewith. Energy Safety found the following violation:

Violation 1. Energy Safety observed that in implementing 2024 WMP initiative 8.1.2.1 - Covered Conductor Installation (WMP.455), SDG&E failed to complete Covered Conductor Installation on pole ID P879035, Grid Hardening ID P879035\_0073-R-CC\_3243 at coordinates 32.7637217031741, -116.688607731081. Energy Safety considers this completeness violation to be in the Moderate risk category.

---

<sup>1</sup> Cal. Code Regs., tit. 14, section 29302(b)(2)

## Response Options

Energy Safety may prescribe a timeframe for resolution of a violation associated with the assigned risk category.<sup>2</sup> Within 30 days from the issuance date of this NOV, the electrical corporation must provide a response advising Energy Safety of corrective actions taken or planned to remedy the above identified violation(s) and prevent recurrence. Alternatively, the electrical corporation must advise Energy Safety that it will not correct the violation, including the reasoning or justification for inaction and all supporting documentation.<sup>3</sup>

This response shall be filed in the Energy Safety e-Filing system under the 2024 NOV Docket<sup>4</sup> and the associated file name(s) must begin with the NOV identification number provided above.

Pursuant to Government Code section 15475.4, if the electrical corporation intends to request a hearing “to take public comment or present additional information,” it must also do so within the 30-day timeframe. If a petition for hearing is not received by the deadline, then the determination and conditions set forth in this NOV become final.

Prior to its response or request for hearing, the electrical corporation may also request an informal conference with Energy Safety’s Compliance Assurance Division for the purpose of disputing any issues raised in this NOV no later than five (5) business days before the response deadline.<sup>5</sup> Requests for informal conference with Energy Safety must be e-mailed to [compliance@energysafety.ca.gov](mailto:compliance@energysafety.ca.gov), with a copy sent to all Energy Safety Compliance Assurance Division staff identified in the NOV.

Pursuant to Public Utilities Code section 8389(g), following receipt of the electrical corporation’s response to this NOV and resolution of any disputes, this matter may be referred to the California Public Utilities Commission for its consideration of potential enforcement action, as it deems appropriate.

Sincerely,



Patrick Doherty  
Program Manager | Compliance Assurance Division  
Office of Energy Infrastructure Safety  
[Patrick.Doherty@energysafety.ca.gov](mailto:Patrick.Doherty@energysafety.ca.gov)

Cc:

Lena McMillin, SDG&E

---

<sup>2</sup> Energy Safety Compliance Guidelines, pp. 3

<sup>3</sup> Energy Safety Compliance Guidelines, pp. 4-5

<sup>4</sup> <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2024%20NOV>

<sup>5</sup> Energy Safety Compliance Guidelines, p. 4

[rmcmillin@sdge.com](mailto:rmcmillin@sdge.com)

Jonathan Woldemariam, SDG&E

[Jwoldemariam@sdge.com](mailto:Jwoldemariam@sdge.com)

Kari Kloberdanz, SDG&E

[kkloberdanz@sdge.com](mailto:kkloberdanz@sdge.com)

Shewit Woldegiorgis, SDG&E

[swoldegiorgis@sdge.com](mailto:swoldegiorgis@sdge.com)

Laura Fulton, SDG&E

[Lfulton@sdge.com](mailto:Lfulton@sdge.com)

Shannon Downey, Energy Safety

[Shannon.Downey@energysafety.ca.gov](mailto:Shannon.Downey@energysafety.ca.gov)

Yana Loginova, Energy Safety

[Yana.Loginova@energysafety.ca.gov](mailto:Yana.Loginova@energysafety.ca.gov)

Samuel Isaiah, Energy Safety

[Samuel.Isaiah@energysafety.ca.gov](mailto:Samuel.Isaiah@energysafety.ca.gov)

[Compliance@energysafety.ca.gov](mailto:Compliance@energysafety.ca.gov)



# INSPECTION REPORT

## Overview

### Inspection Categories

The Office of Energy Infrastructure Safety (Energy Safety) conducts inspections to verify the work performed by an electrical corporation as reported in an approved Wildfire Mitigation Plan (WMP) or subsequent filing, and to assess general conditions of electrical infrastructure that may adversely impact an electrical corporation's wildfire risk.

A Notice of Violation (NOV) is issued for any instances of noncompliance discovered during an inspection related to an electrical corporation's execution of its WMP initiatives.

### Correction Timelines

Violations must be corrected in a timely manner. Energy Safety may prescribe a timeframe for resolution of a violation. If Energy Safety assigns a risk category to a violation, an electrical corporation must correct the violation as required per the timelines provided in Table 1.<sup>6</sup>

**Table 1. Risk Category and Correction Timelines**

Risk Category	Violation and defect correction timeline
Severe	<ul style="list-style-type: none"><li>• Immediate resolution</li></ul>
Moderate	<ul style="list-style-type: none"><li>• 2 months (in High Fire Threat District (HFTD) Tier 3)</li><li>• 6 months (in HFTD Tier 2)</li><li>• 6 months (if relevant to worker safety; not in HFTD Tiers 2 or 3)</li></ul>
Minor	<ul style="list-style-type: none"><li>• 12 months or resolution scheduled in WMP update</li></ul>

---

<sup>6</sup> Energy Safety Compliance Guidelines, p. 3



# Inspection Summary

Table 2 provides a summary of the selection of the WMP inspection location and initiative. Table 3 provides a summary of the violation(s) found during the inspection. Details regarding the inspection that identified the violation(s) are provided in the Inspections Details Section below.

***Table 2: Inspection Location and Initiative Summary***

Electrical Corporation:	San Diego Gas & Electric Company
Report Number:	CAD_SDG_SIS_20250325_0809
Inspector:	Samuel Isaiah
WMP Year Inspected:	2024
Quarterly Data Report (QDR) Referenced:	Quarter (Q4)
Inspection Selection:	Energy Safety viewed the contents of the Q4 QDR and performed an analysis that resulted in the selection of the WMP initiatives and locations referenced in this report.
Relevant WMP Initiative(s):	8.1.2.1 Covered Conductor Installation (WMP.455)
Date of inspection:	March 25, 2025
City and/or County of Inspection:	Alpine, San Diego County
Inspection Purpose:	Assess the accuracy of San Diego Gas & Electric Company’s QDR data, completeness of its work, compliance with WMP requirements, and compliance with its protocols.

***Table 3: WMP Inspection Violation(s)***

Violation #	Structure ID	Grid Hardening ID	Lat/Long	HFTD	Initiative Number	Violation Type	Severity	Violation Description
Violation 1	P879035	P879035_0073-R-CC_3243	32.7637217031741, -116.688607731081	Tier 3	8.1.2.1 -Covered Conductor Installation (WMP.455)	Completeness	Moderate	Down guy fiberglass strain insulator in contact with crossarm suspension dead-end insulator.

# Inspection Details

## **Violation 1:**

### **Relevant Requirement:**

SDG&E's WMP states the following regarding initiative number 8.1.2.1 - Covered Conductor Installation (WMP.455) on poles:

1. "SDG&E implements comprehensive, multi-faceted transmission and distribution inspection and patrol programs. These programs consist of detailed inspections, visual patrols, infrared inspections, and other various specialty patrols, inspections, and assessments. Inspections and patrols of all structures, attachments, and conductor spans are performed to identify facilities and equipment that may not meet [Public Resources Code Section] 4292 and 4293 or [General Order 95] rules. [Energy Safety] Table 8-6 outlines transmission and distribution asset inspection programs by type."<sup>7</sup>

SDG&E's Electric Overhead Construction Standards states the following regarding minimum radial separation for guys passing conductors supported on same pole:

1. Guys passing conductors supported on same pole must maintain a 3-inch separation.<sup>8</sup>
2. "USE OF FIBERGLASS STRAIN INSULATOR DOES NOT REDUCE REQUIRED [General Order 95] CLEARANCES."<sup>9</sup>

### **Finding:**

On Pole ID P879035, Grid Hardening ID P879035\_0073-R-CC\_3243, at Alpine, CA, USA, 32.7637217031741, -116.688607731081, the inspector observed a down guy wire fiberglass strain insulator in contact with a dead-end suspension insulator. The dead-end suspension insulator supports a 12 kV primary phase conductor. The inspector's observation is documented in Violation 1 photographs, which are attachments to this report. Photo numbers Item1IA1Img1, Item1IA1Img2, Item1IA1Img3, and Item1IA1Img4 depict a fiberglass strain insulator in contact with a suspension dead-end insulator near its clevis or socket eye which does not follow SDG&E's covered conductor installation standard.

Energy Safety concludes that Violation 1 is Moderate because of these facts:

1. Per SDG&E's construction standards, three inches must be maintained between guy strain insulators. The down guy wire fiberglass strain insulator is in contact with a suspension dead-end insulator and therefore does not meet the three-inch separation rule.

---

<sup>7</sup>San Diego Gas & Electric Company, "2023-2025 Wildfire Mitigation Plan," October 23, 2023. p. 182 [Online]. Available: <https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true>

<sup>8</sup> San Diego Gas & Electric Company "2022 Overhead Construction Standards Historical Record: 3/25/2022 External Version," March 25, 2022. G.O. 95 Requirements, OH225.2, Sheet 2 of 4, F [Online]. Available: [https://www.sdge.com/sites/default/files/OHCSe\\_37.pdf](https://www.sdge.com/sites/default/files/OHCSe_37.pdf)

<sup>9</sup> San Diego Gas & Electric Company "2022 Overhead Construction Standards Historical Record: 3/25/2022 External Version," March 25, 2022. Guy Assembly Details, OH927.2, Sheet 2 of 3 NOTES, I [Online]. Available: [https://www.sdge.com/sites/default/files/OHCSe\\_37.pdf](https://www.sdge.com/sites/default/files/OHCSe_37.pdf)

2. The suspension dead-end insulator supports a 12 kV phase conductor and may experience friction or a parallel current path that may result in insulator degradation raising its ignition risk.
3. The down guy wire and fiberglass strain insulator of the subject pole are located within HFTD 3.



# Exhibits

## Exhibit A: Photo Log

**Structure ID:** P879035

**Violation 1**

	
<b>Item1GIimg1:</b> Overall Pole	<b>Item1GIimg2:</b> Pole ID
	
<b>Item1IA1img1:</b> Down guy fiberglass strain insulator in contact with primary suspension dead-end insulator.	<b>Item1IA1img2:</b> Down guy fiberglass strain insulator in contact with suspension primary dead-end insulator.



**Item1IA1Img3:** Down guy fiberglass strain insulator in contact with suspension primary dead-end insulator.



**Item1IA1Img4:** Down guy fiberglass strain insulator in contact with suspension primary dead-end insulator.