State of California – A Natural Resources Agency
OFFICE OF ENERGY INFRASTRUCTURE SAFETY
715 P Street, 20th Floor | Sacramento, CA 95814
916.902.6000 | www.energysafety.ca.gov

Gavin Newsom, Governor
Caroline Thomas Jacobs, Director

June 16, 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.[1]

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 P275777, Grid Hardening ID P275777_0073-R-CC_4102 at coordinates 32.760862481866, -116.688413323077. Energy Safety considers this completeness violation to be in the Moderate risk category.

[1] 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.[2] 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.[3]

This response shall be filed in the Energy Safety e-Filing system under the 2024 NOV Docket[4] 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.[5] Requests for informal conference with Energy Safety must be e-mailed to 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

Patrick Doherty
Program Manager | Compliance Assurance Division
Office of Energy Infrastructure Safety
Patrick.doherty@energysafety.ca.gov

Cc:
Lena McMillin, SDG&E
rmcmillin@sdge.com

[2] Energy Safety Compliance Guidelines, pp. 3
[3] Energy Safety Compliance Guidelines, pp. 4-5
[4] https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2024%20NOV
[5] Energy Safety Compliance Guidelines, p. 4

Jonathan Woldemariam, SDG&E
Jwoldemariam@sdge.com
Kari Kloberdanz, SDG&E
kkloberdanz@sdge.com
Shewit Woldegiorgis, SDG&E
swoldegiorgis@sdge.com
Laura Fulton, SDG&E
Lfulton@sdge.com
Shannon Downey, Energy Safety
Shannon.Downey@energysafety.ca.gov
Yana Loginova, Energy Safety
Yana.Loginova@energysafety.ca.gov
Samuel Isaiah, Energy Safety
Samuel.Isaiah@energysafety.ca.gov
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.[6]

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

| Risk Category | Violation and defect correction timeline |
|---|---|
| Severe | • Immediate resolution |
| Moderate | • 2 months (in High Fire Threat District (HFTD) Tier 3)<br>• 6 months (in HFTD Tier 2)<br>• 6 months (if relevant to worker safety; not in HFTD Tiers 2 or 3) |
| Minor | • 12 months or resolution scheduled in WMP update |

[6] 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 |
| Report Number: | CAD_SDGE_ATJ_20250325_0829 |
| Inspector: | Anthony Trujillo |
| WMP Year Inspected: | 2024 |
| Quarterly Data Report (QDR) Referenced: | Quarter 4 (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'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 | P275777 | P275777_0073-R-CC_4102 | 32.760862481866, -116.688413323077 | Tier 3 | 8.1.2.1 - Covered Conductor Installation (WMP.455) | Completeness | Moderate | Excessively loose down guy wire resulting in primary fiberglass strain insulator to rest on 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. The Covered Conductor Program (WMP.455) is a program that replaces bare conductors with covered conductors in the HFTD. Covered conductors are manufactured with an internal semiconducting layer and external insulating ultraviolet-resistant layers to provide incidental contact protection."[7]

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 9-inch separation.[8]
2. "USE OF FIBERGLASS STRAIN INSULATOR DOES NOT REDUCE REQUIRED [General Order 95] CLEARANCES." [9]

**Finding:**

On pole ID P275777, Grid Hardening ID P275777_0073-R-CC_4102 at Alpine, CA, coordinates 32.760862481866, -116.688413323077, the inspector observed an excessively loose 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 attached to this report. Photo numbers Item1IA1Img1, Item1IA1Img2, Item1IA1Img3 and Item1IA1Img4 depict a fiberglass strain insulator in contact with a suspension dead-end insulator between its skirts and the clevis or socket eye, which does not follow SDG&E's covered conductor installation standard. Per the 2024 4th quarter Quarterly Data Report, SDG&E indicated that the covered conductor work was completed at this location.

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

1. Per SDG&E's construction standards, which were in effect at the time of the performance of the covered conductor installation by SDG&E and govern minimum radial separation for guys passing

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[7] San Diego Gas & Electric Company, "2023-2025 Wildfire Mitigation Plan," October 23, 2023. p. 153 [Online]. Available: https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true

[8] San Diego Gas & Electric Company, "2025 Overhead Construction Standards Historical Record: 5/28/2025 External Version," May 28, 2025, Pole Guys and Clearance Between Guys Passing Conductors, OH908.1, Sheet 1 of 2, Table 1, Minimum G.O. 95 Clearances Between Guys Passing Conductors, 7,500 – 20,000 [Online]. Available: https://www.sdge.com/sites/default/files/documents/2025-05/OHCS2025v0528e.pdf?nid=29061

[9] San Diego Gas & Electric Company, "2025 Overhead Construction Standards Historical Record: 5/28/2025 External Version," May 28, 2025, Guy Assembly Details, OH927.2, Sheet 2 of 3 NOTES, I [Online]. Available: https://www.sdge.com/sites/default/files/documents/2025-05/OHCS2025v0528e.pdf?nid=29061

conductors supported on same pole, guys passing conductors supported on same pole must maintain a three-inch separation and the use of fiberglass strain insulators does not reduce this separation. 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.

2. The excessively loose down guy wire was observed as resting on the suspension dead-end insulator which 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 is located within HFTD 3.

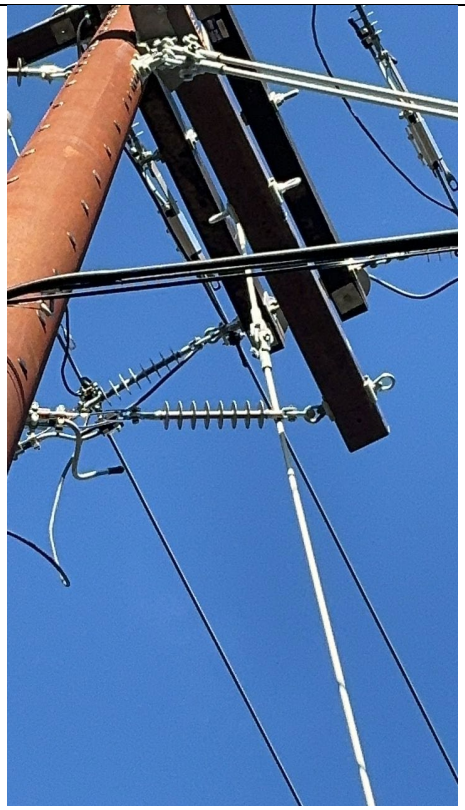
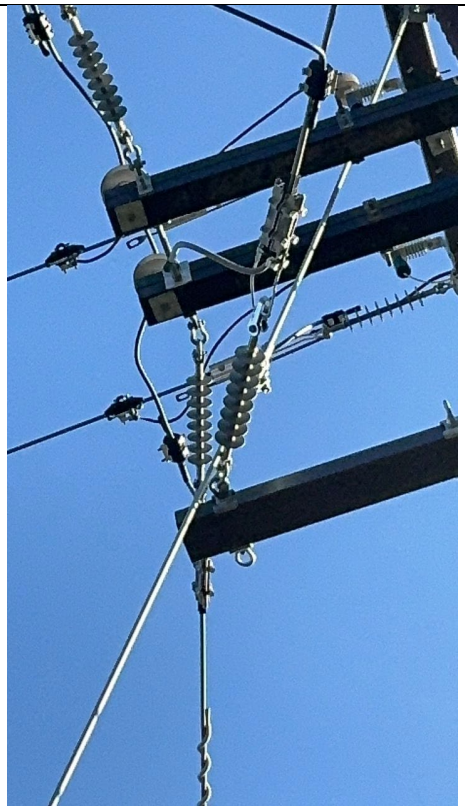
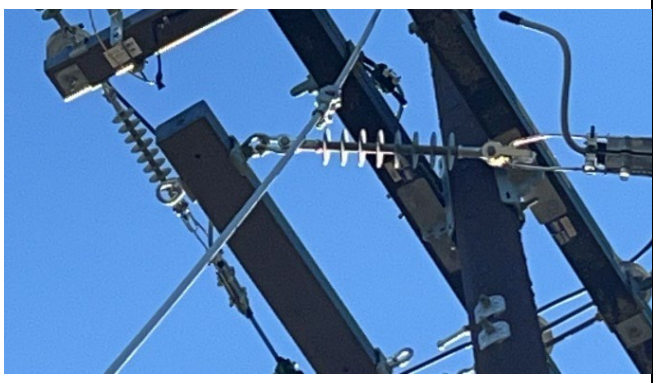
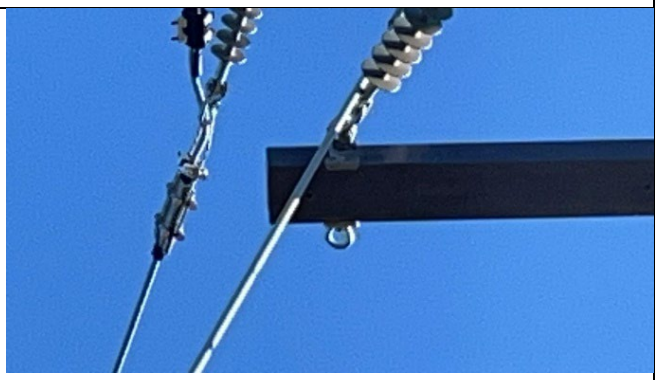
# Exhibits

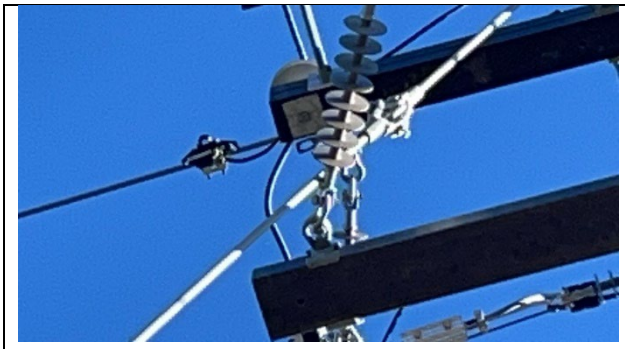
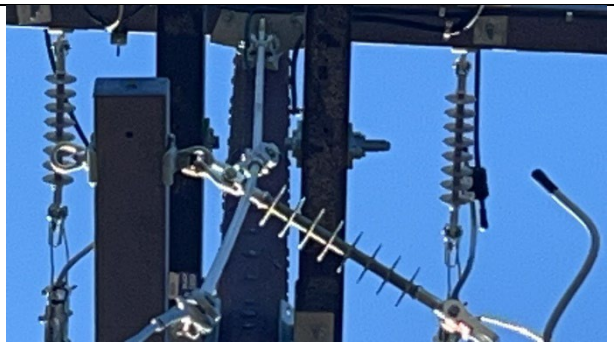
Exhibit A: Photo Log

**Structure ID: P275777**

Violation 1

| | |
|---|---|
|  |  |
| **Item1GImg1**: Overall pole | **Item1GImg2**: Pole ID |

| | |
|---|---|
|  |  |
| **Item1GImg3**: Down guy fiberglass strain insulator in contact with primary suspension dead-end insulator. | **Item1GImg4**: Down guy fiberglass strain insulator in contact with primary suspension dead-end insulator. |
|  |  |
| **Item1IA1Img1**: Down guy fiberglass strain insulator in contact with primary suspension dead-end insulator. | **Item1IA1Img2**: Down guy fiberglass strain insulator in contact with primary suspension dead-end insulator. |

| | |
|---|---|
|  |  |
| **Item1IA1Img3**: Down guy fiberglass strain insulator in contact with primary suspension dead-end insulator. | **Item1IA1Img4**: Down guy fiberglass strain insulator in contact with primary suspension dead-end insulator. |

# Exhibit B: Referenced SDG&E Construction Standards

**SCOPE:** THIS STANDARD ILLUSTRATES POLE GUY AND CLEARANCES BETWEEN GUYS PASSING CONDUCTORS.

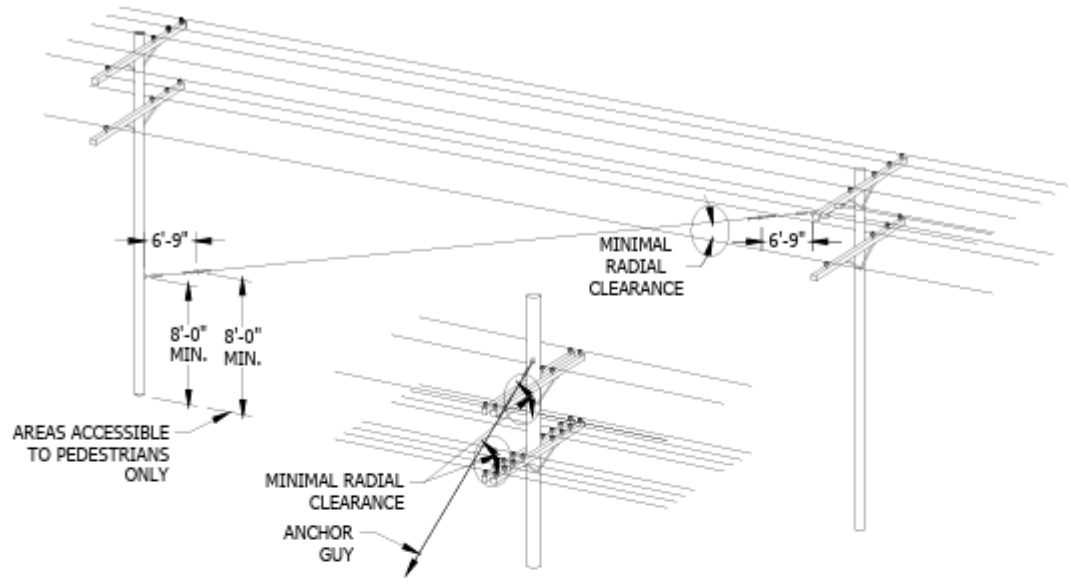



**FIGURE 1**

**TABLE 1**

| MINIMUM G.O. 95 CLEARANCES BETWEEN GUYS PASSING CONDUCTORS | | | |
|---|---|---|---|
| VOLTAGE | RADIAL CLEARANCE | | VERTICAL CLEARANCE |
| | SUPPORTED ON SAME POLE (IN) | SUPPORTED ON OTHER POLES OR SUPPORTED ON SAME POLE BUT APPROXIMATELY PARALLEL (IN) | AT CROSSINGS IN SPANS SUPPORTED ON OTHER POLES (IN) |
| OTHER GUYS | 3 | 3 | 18 |
| COMMUNICATIONS (CLASS C) | 3 | 3 | 24 |
| 0 - 750 | 3 | 12 | 24 |
| 750 - 7,500 | 6 | 18 | 36 |
| 7,500 - 20,000 | 9 | 18 | 36 |
| 20,000 - 35,000 | 12 | 30 | 72 |
| 35,000 - 75,000 | 18 | 36 | 72 |
| 75,000 - 150,000 | 24 | 36 + 0.4 PER KV IN EXCESS OF 75KV | 78 |
| 150,000 - 300,000 | 48 + 0.25 PER KV IN EXCESS OF 150KV | 78 + 0.4 PER KV IN EXCESS OF 150KV | 78 + 0.4 PER KV IN EXCESS OF 150KV |



| REV | CHANGE | DR | BY | DSN | APV | DATE | REV | CHANGE | DR | BY | DSN | APV | DATE |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| C | TABLE UPDATE | EDM | MRF | GLW | CZH | 07/29/2021 | F | | | | | | |
| B | DRAWING UPDATE | PEI | - | - | - | 02/18/2019 | E | | | | | | |
| A | ORIGINAL ISSUE | - | - | PTA | RDJ | 06/17/1974 | D | EDITORIAL CHANGES | GLC | MRF | MRF | FRC | 06/16/2023 |

X Indicates Latest Revision | Completely Revised | New Page | Information Removed

SHEET 1 OF 2

SDG&E ELECTRIC OVERHEAD CONSTRUCTION STANDARDS

POLE GUYS AND CLEARANCE BETWEEN GUYS PASSING CONDUCTORS

OH908.1

**INSTALLATION:**

A. A GUY MARKER MUST BE SECURELY ATTACHED TO ALL SINGLE ANCHOR GUYS. WHERE MORE THAN ONE GUY IS ATTACHED TO AN ANCHOR ROD ONLY, THE OUTER MOST GUY IS REQUIRED TO HAVE A MARKER.

B. IN CORROSIVE AREAS, SUBSTITUTE AN EPOXY COATED MANTA-RAY ANCHOR AND STAINLESS STEEL ROD, OR A STAINLESS STEEL ANCHOR/ ANCHOR ROD ASSEMBLY FOR ITEM 11. (a)

(C) IF NECESSARY, TWO GUYS ARE ALLOWED WITHIN A FOUR-FOOT VERTICAL SECTION OF CLIMBING SPACE, PROVIDED THEY ARE SEPARATED AT THE POLE BY A VERTICAL DISTANCE OF NOT MORE THAN 18 INCHES. (b)

(D) MUST MAINTAIN THREE-INCH SEPARATION BETWEEN GUY STRAIN INSULATORS. (c)

E. USE NO MORE THAN TWO FIBERGLASS STRAIN INSULATORS LINKED WHEN REQUIRED TO SECTIONALIZE. (d)

F. TWO GUY ASSEMBLIES SHALL NOT BE ATTACHED TO THE SAME DEADEND CROSSARM BRACKET.

(G) DOWN GUY OR HEAD GUY CAN BE INSTALLED IN EITHER EYELET.

**BILL OF MATERIALS:**

| ITEM | DESCRIPTION | | QUANTITY | STANDARD PAGE | STOCK NUMBER | DESIGN UNITS |
|---|---|---|---|---|---|---|
| 1 | WIRE - GUY - GALV. | | AS REQ'D | 961 | -- | -- |
| 2 | PLATE - POLE EYE - GALV. | | 1 | 928 | S542944 | EYE-PL |
| 3 | WASHER - SQUARE CURVED RIBBED | 3/4" - 4" | 2 | 390 | S797760 | RIBWSH |
| 4 | BOLT - MACH - GALV. - 3/4" x LENGTH AS NEEDED & SQUARE FLAT WASHER | | 1 | | -- (X) | -- |
| 5 | BOLT - MACH - GALV. | 3/4" | 2 | | -- | -- |
| 6 | GRIP - FACTORY FORMED GUY | | 2 | 962 | -- | -- |
| 7 | SHACKLE - PIN | 5/8" | 1 | 745 | S636432 | 30KSHK |
| 8 | NUT - EYE | 3/4" | AS REQ'D | | S504020 (X) | -- |
| 9 | LINK - CHAIN - DEADEND 1/2" X 2 3/8" | | 1 | 928 | S465750 (X) | DELINK |
| 10 | ROD - ANCHOR (VI) | | 1 | 969 | -- (X) | -- |
| 11 | MARKER - GUY - 8'-0" YELLOW | | 1 | 975 | S476314 | GUYMKR |
| 12 | INSULATOR - GUYSTRAIN - FIBERGLASS | 10'-0" | AS REQ'D | 928 | S430882 (X) | FG-GUY |
| 13 | INSULATOR - GUYSTRAIN - FIBERGLASS | 78" | AS REQ'D | | S430880 | FG78 |
| 14 | INSULATOR - GUYSTRAIN - FIBERGLASS | 54" | AS REQ'D | | S430878 | FG54 |

**NOTES:**

I. USE OF FIBERGLASS STRAIN INSULATOR DOES NOT REDUCE REQUIRED G.O. 95 CLEARANCES.

II. FOR STEEL POLES - A FIBERGLASS GUY STRAIN INSULATOR MUST BE PLACED IN THE GUY AND ATTACHED TO THE POLE, EXTENDING OUTSIDE THE CYLINDER IN THE ZONE BETWEEN PLANE "A" AND "B". IF A SINGLE GUY FIBERGLASS STRAIN INSULATOR DOES NOT EXTEND OUTSIDE OF THE CYLINDER, A PORCELAIN STRAIN INSULATOR OR SECOND FIBERGLASS GUY STRAIN INSULATOR CAN BE USED, BUT CANNOT BE LOWER THAN PLANE "B".

III. A FIBERGLASS STRAIN INSULATOR IS OPTIONAL FOR WOOD POLES.

IV. 1/2-INCH GUY WIRE IS A SPECIAL ORDER ITEM.

(V) ARM GUY ATTACHES TO SPACE BOLT.

(VI) NOT SHOWN ON FIGURES.

(X) THIS ITEM IS EXEMPT.



| REV | CHANGE | DR | BY | DSN | APV | DATE | REV | CHANGE | DR | BY | DSN | APV | DATE |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| C | EDITORIAL CHANGES | - | GW | JS | CZH | 11/01/2018 | F | | | | | | |
| B | DRAWING UPDATES | - | JBH | JBH | MDJ | 08/18/2016 | E | BILL OF MATERIALS UPDATE | EDM | MRF | GLW | CZH | 10/28/2021 |
| A | COMPLETELY REVISED | - | JC | IL | JS/MDJ | 10/08/2015 | D | FIGURE UPDATE | - | JIK | JES | CZH | 08/07/2020 |

Indicates Latest Revision | Completely Revised | New Page X | Information Removed



SDG&E ELECTRIC OVERHEAD CONSTRUCTION STANDARDS

GUY ASSEMBLY DETAILS

OH927.2