



July 7, 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. Lena 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 April 9, 2025, Energy Safety conducted an inspection of SDG&E's WMP initiatives in the vicinity of the city of Fallbrook, California. The inspection report is enclosed herewith. Energy Safety found the following violation:

Violation 1. Energy Safety observed that in implementing 2024 WMP initiative 8.1.4.6 – Lightning Arrester Removal and Replacement (WMP.550), SDG&E failed to complete lightning arrester installation on pole ID714278, Grid Hardening ID 530000355866-P714278 at coordinates 33.3226355693379, -117.158909868891. Energy Safety considers this completeness violation to be in the Minor 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 Docket⁴ 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
Program Manager | Compliance Assurance Division
Office of Energy Infrastructure Safety
Patrick.doherty@energysafety.ca.gov

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=2023%20NOV>

⁵ Energy Safety Compliance Guidelines, p. 4

Cc:

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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	<ul style="list-style-type: none">• Immediate resolution
Moderate	<ul style="list-style-type: none">• 2 months (in High Fire Threat District (HFTD) Tier 3)• 6 months (in HFTD Tier 2)• 6 months (if relevant to worker safety; not in HFTD Tiers 2 or 3)
Minor	<ul style="list-style-type: none">• 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 Company
Report Number:	CAD_SDGE_YLO_20250409_0910
Inspector:	Yana Loginova
WMP Year Inspected:	2024
Quarterly Data Report (QDR) Referenced:	Quarter 3
Inspection Selection:	Energy Safety reviewed the contents of the Q3 QDR and performed an analysis that resulted in the selection of the WMP initiatives and locations referenced in this report.
Relevant WMP Initiative(s):	8.1.4.6 Lightning Arrester Removal and Replacement (WMP.550)
Date of inspection:	April 9, 2025
City and/or County of Inspection:	4551-4585 Dulin Rd, Fallbrook, CA, 92028, USA, San Diego County
Inspection Purpose:	Assess the accuracy of SDG&E'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	714278	530000355866-P714278	33.3226355693379, -117.158909868891	Tier 2	8.1.4.6 Lightning Arrester Removal and Replacement	Completeness	Minor	Failure to complete lightning arrester installation at the location

Inspection Details

Violation 1:

Relevant Requirement:

SDG&E's WMP states the following regarding initiative number 8.1.4.6 – Lightning Arrester Removal and Replacement:

1. "The Lightning Arresters Replacement Program (WMP.550) installs CAL FIRE-approved lightning arresters to mitigate the impact of transient overvoltage on the electric system... CAL FIRE-approved lightning arresters are equipped with an external device that operates prior to the arrester overloading, dramatically reducing the potential of becoming an ignition source."⁷

Finding:

On pole ID 714278, Grid Hardening ID 530000355866-P714278 at 4551-4585 Dulin Rd, Fallbrook, CA, 92028 33.3226355693379, -117.158909868891, the inspector observed that the lightning arrester cover was dislodged. The inspector's observation is documented in Violation 1 photographs, which are attached to this report. Photo numbers Item1IA1Img1, Item1IA1Img2, Item1IA1Img3 depict that lightning arrester cover was dislodged.

Energy Safety concludes that there is a violation because of these facts:

1. San Diego Gas & Electric Company's 2024 WMP Initiative 8.1.4.6 – Lightning Arrester Removal and Replacement work was identified as complete at this location.
2. The lightning arresters' cover was dislodged.
3. SDG&E Electric Overhead Construction Standard OH1640.1 states that "all lightning arresters require cover-up".⁸

⁷ San Diego Gas and Electric, "SDGE 2023-25 Approved Wildfire Mitigation Plan," October 23, 2023, p. 219. [Online]. Available: <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55859&shareable=true>

⁸ See Exhibit B, San Diego Gas & Electric Company, "Electric Overhead Construction Standard (OH) — 2025 Historical Record: 3/21/2025 External Version," OH1640.1, Lightning Arrester and Cutout Cover-Up Devices for Avian Protection, sheet 1 of 1, 2025. p.783. Unpublished.

Exhibits

Exhibit A: Photo Log

Structure ID: 714278

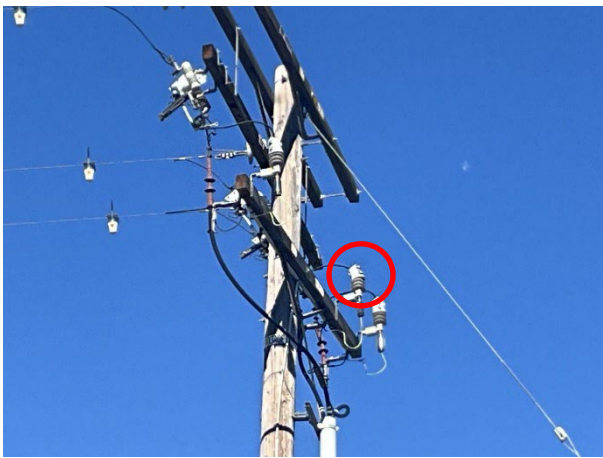
Violation 1



Item1GImg1: Overall pole



Item1GImg2: Pole ID



Item1IA1Img1: Dislodged lightning arrester cover



Item1IA1Img2: Dislodged lightning arrester cover



Item1IA1mg3: Dislodged lightning arrester cover

Exhibit B: Referenced Construction Standard

SCOPE: THIS STANDARD ILLUSTRATES THE INSTALLATION OF AVIAN PROTECTION COVER-UP DEVICES FOR BOTH LIGHTNING ARRESTERS, CUTOUTS AND DISCONNECTS. ALL LIGHTNING ARRESTERS REQUIRE COVER-UP. (C)

ATTENTION:

* THESE COVER-UP DEVICES ARE FOR INCIDENTAL WILDLIFE CONTACT ONLY. THEY ARE NOT RATED FOR PERSONAL PROTECTION AND SHOULD BE TREATED AS BARE WIRE.

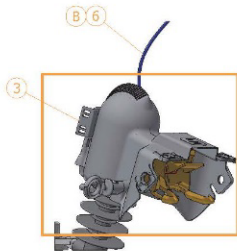


FIGURE 1
AVIAN COVER
FOR CMU/SMU CUTOUTS

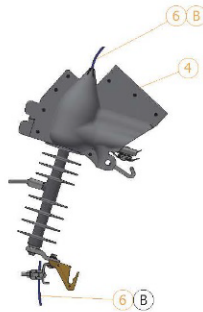


FIGURE 3
AVIAN COVER
FOR INTERCHANGEABLE C/O

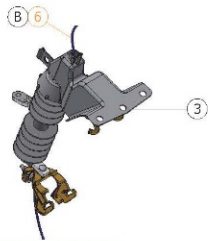


FIGURE 2
AVIAN COVER FOR
CMU/SMU CUTOUTS

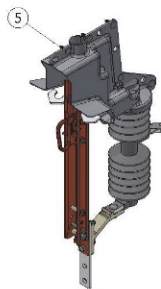


FIGURE 6
AVIAN COVER FOR 900A DISCONNECT

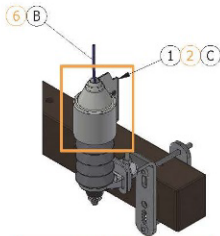


FIGURE 4
AVIAN COVER
FOR LIGHTNING ARRESTERS

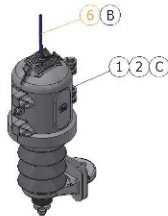


FIGURE 5
AVIAN COVER
FOR LIGHTNING ARRESTERS

INSTALLATION:

- A. THE REQUIRED MINIMUM DISTANCE OF UNCOVERED CONDUCTOR PHASE-TO-PHASE, PHASE-TO-NEUTRAL AND PHASE-TO-GROUND IS 60 INCHES.
- (B) FOR NEW CONSTRUCTION, OR WHEN DE-ENERGIZING EXISTING CONSTRUCTION, USE HENDRIX TAP COVERED WIRE IN PLACE OF JUMPER COVER.
- (C) SILICONE TAPE (1) MAY ALSO BE USED IN LIEU OF THE ARRESTER COVERS OR, FOR ANY DIFFICULT TO COVER TERMINATIONS DOUBLE LAP TAPE PER MANUFACTURER'S INSTRUCTIONS. BLACK ELECTRICAL TAPE MAY BE APPLIED OVER THE SQUIRREL TAPE IF NECESSARY.
- D. INSTALL AVIAN COVER-UP ON ALL HIGH VOLTAGE CONNECTIONS AND DEVICES PER OH1610. INSTALL AVIAN COVER OR PROTECTION TO DEVICES AND CONDUCTORS WHEN REPAIRS ARE MADE DUE TO ANIMAL CONTACTS OUTSIDE THE AVIAN PROTECTION AREA.

- (E) PREFERRED
- (F) ALTERNATE

BILL OF MATERIALS:

ITEM	DESCRIPTION	QUANTITY	STANDARD PAGE	STOCK NUMBER	DESIGN UNITS
1	TAPE, SELF-FUSING GRAY ,1" X 36"	AS REQ'D	-	5721736	(X) -
	TAPE, SELF-FUSING GRAY ,2" X 36"	AS REQ'D	-	5721738	(X) -
2	COVER, BUSHING, ARRESTOR, SLIDE-ON	(F) AS REQ'D	-	5289270	(X) -
	COVER, BUSHING, TRANSFORMER, ARRESTOR	(E) AS REQ'D	1630	5289670	(X) -
3	COVER, SMU/CMU, WITH PIN	(E) AS REQ'D	-	5289616	(X) -
	COVER, SMU/CMU, WITH PIN AND SLIDE	(F) AS REQ'D	-	5289614	(X) -
4	COVER, CUTOUT, UNIVERSAL FIT	AS REQ'D	-	5289662	CCOUNI
5	COVER, 900A DISCONNECT	AS REQ'D	-	5286952	9COCRM
6	WIRE, CU, #4, 7 STR, COVERED	(B) AS REQ'D	711	5812124	HEND4

NOTES:

(X) THIS ITEM IS EXEMPT

REFERENCE: NONE

REV	CHANGE	DRWN	BY	CHKD	APVD	DATE
F	EDITORIAL CHANGES	NV5	SPC	MRF	KRG	01/03/2025
E	EDITORIAL CHANGES	ARC	SPC	MRF	KRG	08/30/2023
D	TABLE UPDATE	EDM	MRF	JES	CZH	08/25/2021



SDG&E ELECTRIC OVERHEAD CONSTRUCTION STANDARDS

**LIGHTNING ARRESTER AND CUTOUT COVER-UP DEVICES
FOR AVIAN PROTECTION**

SCALE: NOT TO SCALE

DRAWING NO:	SHEET:
OH1640.1	1 OF 1