



Laura M. Fulton  
Senior Counsel  
8330 Century Park Court, CP32F  
San Diego, CA 92123-1548  
LFulton@SDGE.com

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**VIA ELECTRONIC FILING**

**Docket # 2023-ARC**

Patrick Doherty  
Program Manager, Compliance Assurance Division  
Office of Energy Infrastructure Safety  
715 P Street, 20th Floor  
Sacramento, CA 95814

**RE: SDG&E Response to the Office of Energy Infrastructure Safety's Annual Report on Compliance Regarding San Diego Gas & Electric Company's Execution of its 2023 Wildfire Mitigation Plan**

Dear Program Manager Doherty:

SDG&E hereby provides this response to the Office of Energy Infrastructure Safety's (Energy Safety) Annual Report on Compliance (ARC) regarding San Diego Gas & Electric Company's (SDG&E) execution of its 2023 Wildfire Mitigation Plan (WMP) issued on June 25, 2025. SDG&E appreciates Energy Safety's conclusion that SDG&E was largely successful in the execution of its WMP.

SDG&E's April 1, 2024 ARC self-identified six initiatives that were delayed or off-track. SDG&E submits the following comments to clarify three initiatives mistakenly identified as not attained in its 2023 ARC for SDG&E. SDG&E respectfully requests that Energy Safety consider these initiatives attained.

**I. The Following Initiatives Should Be Considered Attained**

**A. Expulsion Fuse Replacement Program (WMP.459)**

SDG&E considers its Expulsion Fuse Replacement Program attained for 2023 as SDG&E completed 90% of its target. While SDG&E acknowledges the delay in completing four fuse replacements due to an unforeseen fuse shortage occurring mid-2023, it did not reduce the impact or effectiveness of the initiative.

**B. QA/QC of Distribution Detailed Inspections (WMP.491)**

Energy Safety should reclassify this initiative as attained. The 2023 ARC for SDG&E correctly cites that the program targets a range of 0.5% - 1.5% of completed inspections. SDG&E performed 1.3%, which is within the targeted range. The integer target of 160 presented in SDG&E's Quarterly Data Reports and its 2023 ARC was the upper limit of 1.5%. While SDG&E did not attain the upper limit, it did attain the target range established in its 2023 WMP.

**C. Air Quality Index Sensor Installation (WMP.970)**

SDG&E attained this initiative as it met the Air Quality Index Sensor Installation target of six sensor installations in 2023. SDG&E's 2023 ARC correctly reported the total of six sensor installations.

Energy Safety cites Data Request 280 as the reason for classifying this initiative as not attained, as it was reported five of the six targeted sensors were installed. SDG&E erroneously reported in its response to Data Request 280 that five of the six targeted sensors were installed in 2023. This was an inadvertent carry-over from the 2023 Q4 Quarterly Data Reports. Data reports represent a moment in time and sometimes fail to capture all completed activities within the one-month reporting timeframe. SDG&E's 2023 ARC correctly reported the total of six sensor installations.

**II. CONCLUSION**

SDG&E thanks Energy Safety for this opportunity to respond to its Annual Report on Compliance regarding SDG&E's execution of its 2023 WMP.

Respectfully submitted,

/s/ Laura M. Fulton

Attorney for  
San Diego Gas and Electric Company