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**VIA ELECTRONIC FILING**

**Docket # 2024 NOV**

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

**RE: San Diego Gas & Electric Company's Response to Notice of Violation –  
NOV\_CAD\_SDGE\_SIS\_20250326\_0748**

Dear Program Manager Doherty:

San Diego Gas & Electric Company (SDG&E) provides this response to the finding identified in the Notice of Violation "NOV\_CAD\_SDGE\_SIS\_20250326\_0748" (Notice of Violation or NOV) issued by the Office of Energy Infrastructure Safety's (Energy Safety) on June 10, 2025 regarding Energy Safety's inspection of work completed by SDG&E in accordance with its 2024 Wildfire Mitigation Plan (WMP). Specifically, the NOV describes that on March 26, 2025, Energy Safety conducted an inspection of SDG&E's WMP initiatives in the vicinity of the city of Jamul, California and 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 the installation of California Department of Forestry and Fire Protection (CAL FIRE) approved lightning arresters on Pole ID P571982, Grid Hardening ID 530000354127-P571982, at coordinates 32.723918550838, -116.864380919231. Energy Safety considers this completeness violation to be in the Minor risk category.

SDG&E is not requesting a written hearing for the findings addressed in this response; however, SDG&E reserves the right to raise these points in subsequent procedural stages and/or proceedings as necessary. Further, although Energy Safety has the right to refer certain notices to the California Public Utilities Commission for enforcement action, the findings in this notice do not merit referral, as there is inadequate support for a finding that SDG&E has failed to substantially comply with its approved WMP.<sup>1</sup>

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<sup>1</sup> See Pub. Util. Code §8386.1.

**I. SDG&E RESPONSE****A. Violation 1 – Failure to Install CAL FIRE Approved Lightning Arresters**

Although the original design for P571982 included a lightning arrestor, it was ultimately not required, as the existing transformer is self-protected and internally fused. The as-built reflects that the lightning arrestor was not utilized, which was confirmed during an SDG&E site visit on June 25, 2025. No corrective work is required as this was an inadvertent reporting error due to transcribing the as-built documentation incorrectly into the system of record. SDG&E will correct its 2024 Q4 QDR and resubmit with the upcoming Q2 submission on August 1, 2025.

**II. CONCLUSION**

SDG&E appreciates Energy Safety's continued efforts to identify, communicate, and work together to promote wildfire safety throughout California.

Respectfully submitted,

/s/ Laura M. Fulton

Attorney for

San Diego Gas and Electric Company