



November 10, 2025

Crystal Bertolini
Team Lead, Wildfire Mitigation Program Compliance
San Diego Gas & Electric Company
8316 Century Park Court, CP32F
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NOTICE OF NON-PERFORMANCE

Ms. Crystal Bertolini:

Pursuant to Government Code section 15472, et seq, 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 2025 Wildfire Mitigation Plan (WMP) and determined the existence of nonperformance requiring correction. Energy Safety therefore issues SDG&E a Notice of Non-Performance (NON), identifying nonperformance with its approved WMP.

On October 7, 2025, Energy Safety conducted an inspection of San Diego Gas & Electric Company's WMP initiatives in the vicinity of the city of Valley Center, California. The inspection report is enclosed herewith. Energy Safety found the following deficiencies:

Deficiency 1. Energy Safety observed that in implementing 2025 WMP 8.1.4.6 – Lightning Arrester Removal and Replacement (WMP.550), SDG&E failed to complete lightning arrester installation on pole ID P213266, Grid Hardening ID 530000366779-P213266 at coordinates 33.269487, -117.010332. Energy Safety considers this nonperformance to be in the Minor risk category. SDGE must complete a corrective action for this deficiency by 12 months from date of this notice.

Within 30 days from the issuance date of this NON, the electrical corporation must provide a response advising Energy Safety of corrective actions taken or planned to remedy the identified deficiency or deficiencies.

This response shall be filed in the Energy Safety e-Filing system under the 2025 NON Docket¹ and the associated file name(s) must begin with the NON identification number.

Prior to its response, the electrical corporation may request an informal conference with Energy Safety for the purpose of disputing any issues raised in this NON no later than five (5) business days before the response

¹ <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2025%20NON>

deadline.² Requests for informal conference with Energy Safety must be e-mailed to compliance@energysafety.ca.gov, with a copy sent to all Energy Safety staff identified in the NON.

Sincerely,

Patrick Doherty

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² Energy Safety Compliance Guidelines, p. 4



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 Non-Performance (NON) is issued for any deficiencies discovered during an inspection related to an electrical corporation's performance of its WMP.

Correction Timelines

Deficiencies must be corrected in a timely manner. Energy Safety may prescribe a timeframe for resolution of a deficiency.³ If Energy Safety assigns a risk category to a deficiency, an electrical corporation must correct the deficiency as required per the timelines provided in Table 1.⁴

Table 1. Risk Category and Correction Timelines

Risk Category	Deficiency 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

³ Gov. Code section 15475.2(a)(2)

⁴ 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 deficiency or deficiencies found during the inspection. Details regarding the inspection that identified the deficiency or deficiencies are provided in the Inspections Details Section below.

Table 2: Inspection Location and Initiative Summary

Electrical Corporation:	San Diego Gas and Electric Company
Report Number:	CAD_SDGE_YLO_20251007_1346
Inspector:	Yana Loginova
WMP Year Inspected:	2025
Quarterly Data Report (QDR) Referenced:	Quarter 2 (Q2)
Inspection Selection:	Energy Safety reviewed the contents of the Q2 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:	October 7, 2025
City and/or County of Inspection:	Valley Center, 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 Deficiencies

Deficiency #	Structure ID	Grid Hardening ID	Lat/Long	HFTD	Initiative Number	Severity	Deficiency Description
Deficiency 1	P213266	5300003667 79-P213266	33.269487, - 117.010332	Tier 2	8.1.4.6 Lightning Arrester Removal and Replacement	Minor	Failure to complete lightning arrester installation at the location

Inspection Details

Deficiency 1

Relevant Requirement:

SDGE'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.”⁵

Findings:

On pole ID P213266, Grid Hardening ID 530000366779-P213266 at 30601-30671 Ranch Creek Rd, Valley Center, CA, 92082, USA, 33.269487, -117.010332, the inspector observed that avian protection was missing from the lightning arrester. The inspector's observation is documented in Deficiency 1 photographs, which are attachments to this report. Photo numbers IA1Img1, IA1Img2 and IA1Img3 depict missing avian protection.

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

1. San Diego Gas & Electric Company's 2025 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 missing.
3. SDG&E Electric Overhead Construction Standard OH1640.1 states that “all lightning arresters require cover-up”.⁶

⁵ 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>

⁶ 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: P213266

Deficiency 1



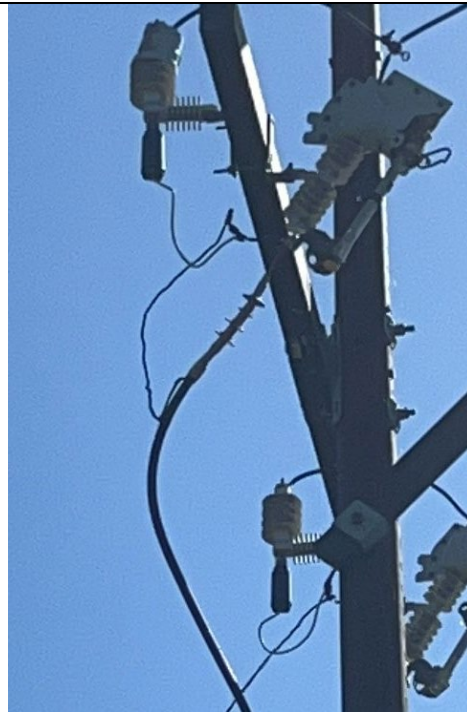
GIimg1: Overall Structure



GIimg2: Structure ID



IA1img1: Missing avian protection on lightning arrester



IA1img2: Missing avian protection on lightning arrester (from different side)



IA1Img3: Lighting arrester cover found on the ground

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.

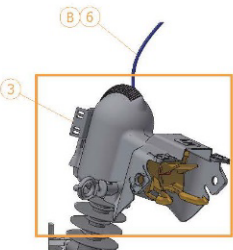


FIGURE 1
AVIAN COVER
FOR CMU/SMU CUTOUTS



FIGURE 3
AVIAN COVER
FOR INTERCHANGEABLE C/O

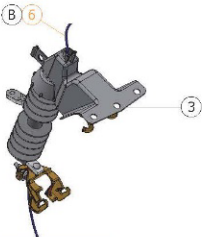


FIGURE 2
AVIAN COVER FOR
CMU/SMU CUTOUTS

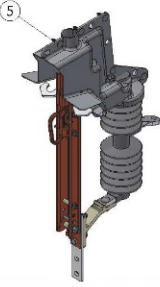


FIGURE 6
AVIAN COVER FOR 900A DISCONNECT

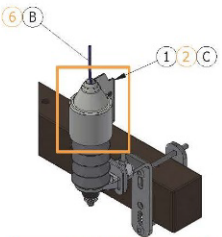


FIGURE 4
AVIAN COVER
FOR LIGHTNING ARRESTERS

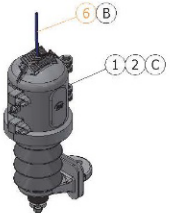


FIGURE 5
AVIAN COVER
FOR LIGHTNING ARRESTERS

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



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- 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

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

Indicates Latest Revision Completely Revised New Page Information Removed