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**VIA ELECTRONIC FILING**

**Docket # 2025 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 Non-Performance –  
NON\_CAD\_SDGE\_YLO\_20251007\_1346**

Dear Program Manager Doherty:

San Diego Gas & Electric Company (SDG&E) provides this response to the finding identified in the Notice of Non-Performance "NON\_CAD\_SDGE\_YLO\_20251007\_1346" (Notice of Non-Performance or NON) issued by the Office of Energy Infrastructure Safety's (Energy Safety) on November 10, 2025 regarding Energy Safety's inspection of work completed by SDG&E in accordance with its 2025 Wildfire Mitigation Plan (WMP). Specifically, the NON describes that on October 7, 2025, Energy Safety conducted an inspection of SDG&E's WMP initiatives in the vicinity of the city of Valley Center, California and found the following deficiency:

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.

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 – Avian Protection Was Missing from the Lightning Arrester at P213266**

SDG&E resolved this violation by reinstalling the avian protection on the lightning arrester on P213266 on November 14, 2025. Please refer to the three figures below.

**Figure 1**



**Figure 2**



**Figure 3**

## 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