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California Public Utilities Commission (CPUC)
Attn: Majed Ibrahim

RE: Electric Audit of SDG&E North Coast District - EA2026-1367

Mr. Ibrahim:

A General Order 165 Electric Distribution Audit/Inspection of SDG&E's North Coast Construction and Operation District (conducted by SED Engineer Norvik Ohanian) was held from June 1-5, 2026. During the field inspection your staff identified a total of one overhead finding involving Customer Owned Equipment, nine SDG&E overhead findings and one SDG&E underground finding.

The record review identified one overdue underground detailed inspection relative to SDG&E's scheduled due dates. Without admitting any violation of GO 165, Section III-B, GO 95, Rule 31.2, or GO 128, Rule 17.2, SDG&E provides the following response. Based on its records, SDG&E confirms that between May 2024 and April 2026, a total of one underground detailed inspection was completed after the scheduled due date; however, it was completed within two months of the respective GO 165 due date. While SDG&E strives to complete inspections as close as possible to their assigned schedules, various factors may affect timely completion. These factors include, but are not limited to, severe weather events, customer-driven scheduling constraints, access challenges, permitting delays, and environmental considerations.

The record review also identified one underground work order notification that was completed after SDG&E's internally assigned due date. This notification was directly associated with the overdue underground detailed inspection discussed above and resulted from the delayed completion of that inspection. The notification was completed concurrently with the completion of the inspection.

The field inspection portion of the audit identified a handhole that did not have a high-voltage warning sign installed. GO 128 Rule 35.3 requires warning signs indicating high voltage shall be installed on an interior surface, or barrier if present, inside the entrance of vaults, manholes, handholes, pad mounted transformer compartments, and other above ground enclosures containing exposed live parts above 750 volts. In this case, the handhole identified during the audit **does not contain any exposed live parts operating above 750 volts**. Therefore, the applicability criteria specified in GO 128, Rule 35.3 are not met for this structure. Accordingly, SDG&E respectfully requests that the Commission reconsider its determination that SDG&E violated GO 128, Rule 35.3 with respect to this finding.

SDG&E has fully addressed all nine SDG&E field findings and the one Customer Owned Equipment field finding. The nine SDG&E fielding findings were completed on the same day the findings were identified during the audit. For the customer-owned service pole, SDG&E notified the customer of the unsafe condition and subsequently verified that the necessary repairs had been completed.

SDG&E appreciates the communication and dialogue shared with your engineering team during the audit.

Sincerely,

Stacy Lovell-Garra

Stacy Lovell-Garra, Program Management Compliance Advisor