



[REDACTED]
Mgr – Electric Assets
& Compliance
8680 Balboa Ave
San Diego, CA 92123
[REDACTED]

April 3, 2024

Anthony Noll
Program Manager, Wildfire Safety and Enforcement Branch
California Public Utilities Commission
Via email: Anthony.noll@cpuc.ca.gov

RE: Notice of Violation - Border Fire Incident 220901-15253

Dear Mr. Noll:

San Diego Gas & Electric has reviewed the March 8, 2024 Notice of Violation (NOV) letter and requests that Safety and Enforcement Division (SED) reconsider the issuance of this NOV for the reasons stated herein.

First, the cover letter states that “This incident resulting in the Border 32 Fire, which burned 4456 acres, deenergized 317 customers, and caused \$154,306.06 in damage to utility equipment.” We wish to clarify that the incident reported by SDG&E was the property loss to SDG&E of \$154,306.06 resulting from the Border 32 Fire. SDG&E equipment was not the cause of the fire.

SDG&E Response to Violation 1

Violation 1 concludes that SDG&E did not properly preserve evidence because it “cut them up into segments and stacked them on top of one another in a container, which prohibited SED from accessing and identifying the damaged poles.”

In response, SDG&E asserts that on September 14, 2022, SDG&E did provide Commission staff, Ed Pike and Chris Lee, access to the evidence collected by the utility following the incident. At the time of the site visit, the evidence had only recently been collected and removed from the burn area and being stored at 20551 Campo Rd, Dulzura CA in a containment bin. SDG&E is not aware of any requests made during or after the site visit, that Commission staff wanted to view or further examine the physical evidence collected. If Commission Staff would like to examine

the evidence in greater detail, those materials are preserved at SDG&E's evidence locker for at least five years as required by Rule 19 and can be made available to SED upon request.

Moreover, the 14 utility poles that were placed in the bin included 1 steel and 13 wood poles. Each pole experienced various levels of damage due to the fire. To make the area safe, restore service and comply with the requirements of Assembly Bill No. 332, that outlines the management standards for storage, transport and disposal of treated wood waste, the poles were resized (as appropriate) and placed into proper containment for transport to SDG&E's evidence locker. Specifically, Assembly Bill 332, requires treated wood waste to be stored so it does not contact soil and can be covered to protect from precipitation. See [Bill Text - AB-332 Hazardous waste: treated wood waste: management standards. \(ca.gov\)](#).

In conclusion, SDG&E does not agree that it is in violation of General Order 95 Rule 19, in its cooperation with Commission staff during its investigation of this incident or the collection and handling of the physical evidence collected following the Border 32 Fire.

SDG&E Response to Violation 2

Violation 2 concludes that "SDG&E did not maintain annual patrol inspection records in the SAP System for some of its poles, and that it did not specify the equipment inspected in its patrol inspection records in 2018."

While SDG&E does admit that the data request response did contain some errors, we do have those patrol records and apologize for the mistake. Below are further details regarding the errors made in the original response.

As part of Data Request SED-01 Question 7, SDG&E provided patrol records for the last five years (2018-2022) for the 14 poles affected by the Border 32 Fire with the exception of a missing record for P873035 for year 2018 that was inadvertently omitted.

In addition, we noted in our response that there was a technical error where a script did accurately write the individual pole numbers located in the "Functional Location" map area into the "Description" section of the record. This error occurred for the following poles and years:

P873040 – 2021
P873042 – 2021
P874585 – 2021
P873039 – 2021, 2019
P873041 – 2021
P873035 – 2019
P175963 – 2021
P971188 – 2021

With that said, our SAP record-keeping system for patrol inspections is organized by "area," identified as the "Functional Location," rather than by equipment, which is in compliance with General Order 165 Part III(C) which states "For all inspections, records shall specify the circuit,

area, facility or equipment inspected, the inspector, the date of the inspection, and any problems..." (emphasis added).

So, while there was a system error listing the pole numbers in the Description text box in SAP, the record still includes the inspector, the date of the inspection and the **area** inspected.

SDG&E does understand that this may have been confusing to the investigators reviewing the data request submittal, but we did not realize there were any concerns regarding the completeness of the patrol records until we received this NOV. To resolve this issue, we have included the screenshot for the one record mistakenly omitted as Attachment A. In addition, we compiled a patrol inspection report at the equipment level, rather than the area for the 14 poles for 2018-2022 and provided that as Attachment B to this letter. We hope this additional information and clarification sufficiently resolves the Violation 2 finding and apologize for the errors and confusion in our original data request response.

SDG&E would appreciate if SED could review this response and reconsider the two Violation findings.

Please let us know if a meeting would help resolve any remaining questions or concerns from your incident investigators.

Sincerely,

[REDACTED]

Manager, Electric Assets & Compliance

cc: Leslie Palmer, CPUC
Chris Lee, CPUC
Ed Pike, CPUC
Layla Labagh, CPUC
Irene Moosen, CPUC
Amy Yip-Kikugawa

[REDACTED]

ATTACHMENT A

Notification	100011657896	1D	PATROL Y1 INTERVAL 02	
Notific. Status	NOCO		COMP	
Notification Header Location Maintenance Plan				
Reference object				
Functional loc.	ED.MTE.MAPS.1408	ED:STD:MAP:17340-118380		
Equipment				
Assembly				
Subject				
Work Type	SDED-PA	199	Patrol Inspection	
Description	PATROL Y1 INTERVAL 02			
02/09/2018 08:32:10 PST (LBOURGEO) Phone Inspected by #11614 on 2/8/18, no infracations found.				
Start/End Dates				
Required Start	02/01/2018	00:00:00	Priority	no value default
Required End	05/31/2018	00:00:00		
Revision		SDGE		
Responsibilities				
Planner group	/	SDGE		
Main WorkCtr	EDU_MTE	/	SDED	MOUNTAIN EMPIRE ELEC UG
Job Owner	5632			
Job Owner	5632			
Reported by	11614	Notif.date	01/25/2018	01:34:14

ATTACHMENT B

STRUCTURE ID	Notification	COMPLETED DATE	Description	COMPLETED BY	Condition Code
P873040	100011657903	02/08/2018	PATROL Y1 INTERVAL 02	JDUKES	No Findings
P873040	100013648510	02/19/2019	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P873040	100017437086	02/07/2020	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P873040	100019309543	02/04/2021	PATROL Y1 INTERVAL 02	CWELDY	No Findings
P873040	100021253056	02/06/2022	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P874627	100011657909	02/08/2018	PATROL Y1 INTERVAL 02	JDUKES	No Findings
P874627	100013648516	02/19/2019	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P874627	100017437092	02/07/2020	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P874627	100019309543	02/04/2021	PATROL Y1 INTERVAL 02	CWELDY	No Findings
P874627	100021253062	02/06/2022	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P874628	100011657909	02/08/2018	PATROL Y1 INTERVAL 02	JDUKES	No Findings
P874628	100013648516	02/19/2019	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P874628	100017437092	02/07/2020	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P874628	100019309543	02/04/2021	PATROL Y1 INTERVAL 02	CWELDY	No Findings
P874628	100021253062	02/06/2022	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P874589	100011657909	02/08/2018	PATROL Y1 INTERVAL 02	JDUKES	No Findings
P874589	100013648516	02/19/2019	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P874589	100017437092	02/07/2020	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P874589	100019309543	02/04/2021	PATROL Y1 INTERVAL 02	CWELDY	No Findings
P874589	100021253062	02/06/2022	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P874588J	100011657909	02/08/2018	PATROL Y1 INTERVAL 02	JDUKES	No Findings
P874588J	100013648516	02/19/2019	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P874588J	100017437092	02/07/2020	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P874588J	100019309543	02/04/2021	PATROL Y1 INTERVAL 02	CWELDY	No Findings
P874588J	100021253062	02/06/2022	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P873042	100011657903	02/08/2018	PATROL Y1 INTERVAL 02	JDUKES	No Findings
P873042	100013648510	02/19/2019	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P873042	100017437086	02/07/2020	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P873042	100019309543	02/04/2021	PATROL Y1 INTERVAL 02	CWELDY	No Findings
P873042	100021253056	02/06/2022	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P874585	100011657903	02/08/2018	PATROL Y1 INTERVAL 02	JDUKES	No Findings
P874585	100013648510	02/19/2019	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P874585	100017437086	02/07/2020	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P874585	100019309543	02/04/2021	PATROL Y1 INTERVAL 02	CWELDY	No Findings
P874585	100021253056	02/06/2022	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P873039	100011657903	02/08/2018	PATROL Y1 INTERVAL 02	JDUKES	No Findings
P873039	100013648510	02/19/2019	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P873039	100017437086	02/07/2020	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P873039	100019309543	02/04/2021	PATROL Y1 INTERVAL 02	CWELDY	No Findings
P873039	100021253056	02/06/2022	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings

STRUCTURE ID	Notification	COMPLETED DATE	Description	COMPLETED BY	Condition Code
P873041	100011657903	02/08/2018	PATROL Y1 INTERVAL 02	JDUKES	No Findings
P873041	100013648510	02/19/2019	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P873041	100017437086	02/07/2020	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P873041	100019309543	02/04/2021	PATROL Y1 INTERVAL 02	CWELDY	No Findings
P873041	100021253056	02/06/2022	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P873035	100011657896	02/08/2018	PATROL Y1 INTERVAL 02	JDUKES	No Findings
P873035	100013648503	02/19/2019	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P873035	100017437079	02/07/2020	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P873035	100019309536	02/04/2021	PATROL Y1 INTERVAL 02	CWELDY	No Findings
P873035	100021253050	02/06/2022	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P175963	100011657893	02/08/2018	PATROL Y1 INTERVAL 02	JDUKES	No Findings
P175963	100013648500	02/19/2019	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P175963	100017437076	02/07/2020	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P175963	100019309533	02/04/2021	PATROL Y1 INTERVAL 02	CWELDY	No Findings
P175963	100021253047	02/06/2022	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P971188	100011657893	02/08/2018	PATROL Y1 INTERVAL 02	JDUKES	No Findings
P971188	100013648500	02/19/2019	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P971188	100017437076	02/07/2020	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P971188	100019309533	02/04/2021	PATROL Y1 INTERVAL 02	CWELDY	No Findings
P971188	100021253047	02/06/2022	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P175953	100011657894	02/08/2018	PATROL Y1 INTERVAL 02	JDUKES	No Findings
P175953	100013648501	02/19/2019	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P175953	100017437077	02/07/2020	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P175953	100019309534	02/04/2021	PATROL Y1 INTERVAL 02	CWELDY	No Findings
P175953	100021253048	02/06/2022	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P874629	100011657909	02/08/2018	PATROL Y1 INTERVAL 02	JDUKES	No Findings
P874629	100013648516	02/19/2019	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P874629	100017437092	02/07/2020	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P874629	100019309543	02/04/2021	PATROL Y1 INTERVAL 02	CWELDY	No Findings
P874629	100021253062	02/06/2022	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings