



██████████
Mgr – Electric Assets &
Compliance

8680 Balboa Avenue
San Diego, CA 92123
██████████
██████████

August 16, 2024

Nathan Sarina
Program Manager, Wildfire Safety and Enforcement Branch
California Public Utilities Commission
Via Email: Nathan.Sarina@cpuc.ca.gov

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

Dear Mr. Sarina:

San Diego Gas & Electric has reviewed the July 12, 2024, Evaluation Notice of Violation (NOV) letter and is providing the following response to the request for additional information for further evaluation.

Before responding to the evaluation letter, we wanted to provide a correction to the incident report. We had reported in prior data requests that there were 14 poles replaced because of the Border 32 Fire; however, as we reviewed the evidence in the locker and analyzed the work orders associated with each of the poles, we identified that two of the poles, including the steel pole, were not replaced. The steel pole only required removal of the fire retardant and reconductoring. Similarly, one of the wood poles did not require replacement and one of the poles was owned by AT&T.

With this information, we determined that the value of the property damaged by the Border 32 Fire was under the \$50,000 incident reporting threshold in Decision No. 06-04-055. Below is a list of the poles, work orders and whether the pole was replaced.

W/O #	Pole #	Material	Height	Vintage	Ex. Height, Class and Install Year	Replaced?
530000291169	P874589	wood	45	1975	EX. 45' CL 1 - 01/01/1975	Replaced
530000291692	P175963	wood	30	1976	EX. 30' CL 5 - 01/01/1976	Replaced
530000292334	P874629	wood	45	1991	EX. 45' CL 1 - 06/01/1991	Replaced
530000291052	P874628	wood	45	1994	EX. 45' CL 5 - 07/01/1994	Replaced
530000291071	P873040	wood	45	2007	EX. 45' CL 3 - 10/01/2007	Replaced

530000291012	P874627	wood	45	2007	EX. 45' CL 3 - 11/01/2007	Replaced
530000291090	P873042	wood	45	2007	EX. 45' CL 3 - 10/01/2007	Replaced
530000290990	P873039	wood	45	2007	EX. 45' CL 3 - 10/01/2007	Replaced
530000290950	P873041	wood	45	2007	EX. 45' CL 3 - 10/01/2007	Replaced
530000291105	P874585	wood	50	2007	EX 50' CL 3 - 10/01/2007	Replaced
530000291126	P873035	wood	50	2007	EX. 50' CL 3 - 10/01/2007	Replaced
530000291086	P874588J	wood	50	N/A	EX. 50' CL 3 - 01/01/1975	AT&T Owned
530000291762	P971188	wood	65	1981	EX. 65' CL 1 - 01/01/1981	Not replaced - per as-built
530000291693	P175953	steel	55	2020	EX. 55' CL 1 SW - 11/12/2020	Not Replaced - per as-built

In addition to the corrective actions being taken described herein, we are also implementing additional procedures to complete a timelier review of the property damage value associated with incidents in the future and independently confirm the scope of the work orders associated with an incident reported due to the value of property damage.

SDG&E Response to Violation 1

SED's Evaluation of SDG&E's Response to Violation #1

If poles were required to be resized for the purpose of storage and transport each piece of evidence should have been labeled such that it could be arranged to show the state of each pole and the attached equipment at the time the evidence was collected. On September 14, 2022, SED was given access to the bin containing the evidence collected by the utility. SED was able to climb an attached ladder on the gate side of the bin and view the collected evidence from the top. SED was also able to gain access into the bin through the gate side which had limited standing room and was not obstructed by the evidence. At least half of the bin was filled to the top, with some of the evidence being visible from outside the bin. Inside the bin, SED had a limited view of the evidence that was under the pile. The evidence collected was not arranged in a way that made it possible for SED to see which pieces belonged together. Thus, it was difficult for SED to determine how many poles were in the bin or identify the steel pole that SDG&E referred to in its NOV response. From the access given, SED did not observe any tags or labels on the evidence. In addition, SED observed two damaged transformers next to the bin without any tags or labels.

In response to data request SED-02-Border 32 Fire, Question 9(b), SDG&E submitted Non-Operational Standard Practice Procedure 012 "INTERNAL INCIDENT INVESTIGATION AND REPORTING PROCEDURES." On page 5 of 7, it states in part:

"Key steps for data collection

- Don't touch any evidence until it has been photographed[.]
- Store small evidence in an evidence bag and tag large pieces of evidence. Record the item's original location on the bag or tag with a permanent marker."

Please provide the following. If not available, please explain why.

1. Photographs of the evidence before removal from the original location.

SDG&E Response

See Attachment A 2.

2. Photographs of evidence bags or tags that were created at the time of evidence collection.

SDG&E Response

There are no photographs of evidence bags or tags because SDG&E crews did not create evidence bags or tags when performing the restoration work associated with this incident.

3. Photographs of the evidence at the evidence locker showing equipment ID numbers (provide description where ID number is not applicable or unavailable).

SDG&E Response

See Attachment B

4. Evidence log / chain of custody documentation.

SDG&E Response

See Attachment C

SDG&E acknowledges that SED may decide at a later time to examine the evidence at SDG&E's evidence locker. SDG&E would also like to note that enhanced training has been conducted with crews and support staff on evidence collection procedures.

SDG&E Response to Violation 2

SED's Evaluation of SDG&E's Response to Violation #2

The organization of a record-keeping system for annual patrol inspection records by functional location complies with GO 165 Part III(C) if the group of poles in each functional location is clearly defined. SED's understanding is that the organization of annual patrol inspection records by functional location means that the annual patrol inspection records for a given functional location should cover the same set of poles each year, given that that functional area should remain constant. However, in the Affection Section Pole Info.xlsx spreadsheet SDG&E provided in response to data

request SED-02-Border 32 Fire, Question 4, some patrol inspection records do not meet this requirement. Here are a couple of examples (See Attachments A and B for screenshots):

- Tab P873035, Functional Location ED.MTE.MAPS.1408 (ED:STD:MAP: 17340-118380) shown in Attachment A
 - The list of pole numbers for 2019 patrol inspection record is different from the list for 2020 – 2022 patrol inspection records. The last three poles on the 2019 record do not appear on the 2020 – 2022 records.
- Tab P971188, Functional Location ED.MTE.MAPS.1375 (ED:STD:MAP: 17325-118370) shown in Attachment B
 - The list of pole numbers for all patrol inspection records on the tab are different.

Please provide responses to the following:

5. Is SED's understanding of how annual patrol inspection records should appear in the SAP system for a functional location when pole numbers are listed correct? If not, please explain why. If SED's understanding is correct, explain the discrepancy on Tab P873035 and Tab P971188.

SDG&E Response

SDG&E's annual patrol inspection records for a given a map functional location covers the same standard/facility map grid and that map functional area does remain constant. General Order 165 Part III(D) states "Each utility will define its reporting unit basis (e.g., circuit, grid, facility / equipment)." (emphasis added).

As poles are added, removed, or "corrected" in GIS for spatial accuracy, the set of poles within the Map Functional Location and its associated Map can change. P874585, P873042 and P873040 are examples of poles changing Map Functional Location and its associated Map in 2021 to Map 17325-118370, then changing back to 17355-118380 in 2022. See Attachment D

6. In the Affection Section Pole Info.xlsx spreadsheet, some poles appear to belong to more than one functional location. Below are three examples. See Attachment C for screenshots of the 2022 records and the 2021 record. Please explain: a) the three examples below, and b) the circumstances under which poles will appear in more than one functional location.

- Pole P874585 appears in Functional Locations ED.MTE.MAPS.1440 and ED.MTE.MAPS.1375.
 - Tab P874585, Functional Location ED.MTE.MAPS.1440 (ED:STD:MAP:17355-118380), in the 2019, 2020 and 2022 records. (The note at the bottom of the tab mentions pole P874585 is missing from the 2021 record due to data issues.)

- Tab P971188, Functional Location ED.MTE.MAPS.1375 (ED:STD:MAP: 17325-118370), in the 2021 record.
- Pole P873042 appears in Functional Locations ED.MTE.MAPS.1440 and ED.MTE.MAPS.1375
 - Tab P873042, Functional Location ED.MTE.MAPS.1440 (ED:STD:MAP:17355-118380), in the 2019, 2020 and 2022 records. (The note at the bottom of the tab mentions pole P873042 is missing from the 2021 record due to data issues.)
 - Tab P971188, Functional Location ED.MTE.MAPS.1375 (ED:STD:MAP: 17325-118370), in the 2021 record.
- Pole P873040 appears in Functional Locations ED.MTE.MAPS.1440 and ED.MTE.MAPS.1375.
 - Tab P873040, Functional Location ED.MTE.MAPS.1440 (ED:STD:MAP: 17355-118380), in the 2019, 2020 and 2022 records. (The note at the bottom of the tab mentions pole P873040 is missing from the 2021 record due to data issues.)
 - Tab P971188, Functional Location ED.MTE.MAPS.1375 (ED:STD:MAP: 17325-118370), in the 2021 record.

SDG&E Response

- a) P874585, P873042 and P873040 are examples of poles changing Map Functional Location and its associated Map in 2021 to Map 17325-118370, then changing back to 17355-118380 in 2022. See Attachment D The remaining poles identify the Map Functional Location ED.MTE.MAPS.1440 is associated to Map (ED:STD:MAP:17355-118380) and the Map Functional Location ED.MTE.MAPS.1375 is associated to Map (ED:STD:MAP: 17325-118370). These are Map Functional Locations organized by “area/grid,” identified as the “Functional Location,” rather than by equipment.
 - b) As poles are added, removed, or move in GIS for spatial accuracy the set of poles within the Map Functional Location and its associated Map can change. See response #5.
7. When SDG&E field/administrative staff need to verify the pole numbers in a functional location, do they refer to the Description text box in SAP? If not, provide SED with a description of the process SDG&E staff use to verify the pole numbers in each functional location.

SDG&E Response

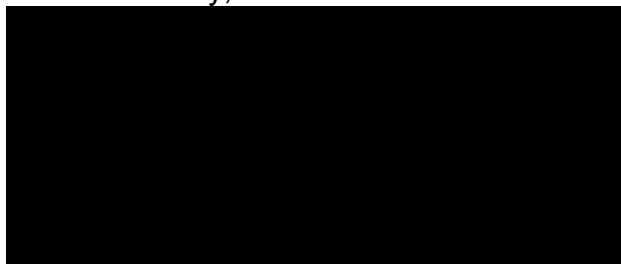
For SDG&E field/administrative staff to verify the previous poles within a particular map grid, first the list of poles (or other structure type) to be evaluated would need to be extracted from SAP in a transaction that lists the "Facility Map/ED:STD:MAP". Then that list of facility maps will be tied to the Map Functional Location description to capture the GIS map grid ID, that lastly is associated to the SAP Map FLOC. Once the Map FLOC is found, then the Patrol

Notifications can be extracted from SAP to provide Patrol history. See Attachment E.

For SDG&E field/administrative staff to verify the current poles within a particular map grid, first the list of poles (or other structure type) to be evaluated would need to be extracted from SAP in a transaction that lists the "Facility Map/ED:STD:MAP". Then, that list of facility maps will be tied to the Map Functional Location description to capture the GIS map grid ID, that lastly is associated to the SAP Map FLOC. Once the Map FLOC is found, then the Map FLOC can be searched in GIS/SPARC to verify the current pole numbers in each Map FLOC. See Attachment E.

If further discussion regarding the technical operation of our record-keeping system is needed, please let us know.

Sincerely,



CC:

Lee Palmer, Director, Safety and Enforcement Division

Chris Lee, Senior Utilities Engineer, Wildfire Safety and Enforcement Branch

Ed Pike, Senior Utilities Engineer, Wildfire Safety and Enforcement Branch

Anthony Noll, Program Manager, Wildfire Safety and Enforcement Branch

Layla Labagh, Attorney, Legal Division, CPUC

Irene Moosen, Senior Counsel, Legal Division, CPUC

Amy Yip-Kikugawa, Assistant General Counsel, Legal Division, CPUC

[REDACTED], Senior Claims Advisor, SDG&E

[REDACTED], Compliance Management Technical Advisor, SDG&E

[REDACTED], Managing Attorney, SDG&E