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Fadi Daye
CA Public Utilities Commission
320 West 4th Street, Suite 500
Los Angeles, CA 90013-1105

SUBJECT: Electric Audit of SDG&E North Coast District File No. EA2024-1255

Mr. Daye:

A General Order 165 Electric Distribution Audit/Inspection of SDG&E's North Coast Construction and Operation District (conducted by SED Engineer Jose Lastra) was held from July 15-19, 2024. During the field inspection your staff identified a total of seven SDG&E overhead findings.

The record review findings included 76 Overhead Detailed Inspections past SDG&E's scheduled due date. 74 of the 76 Overhead Detailed Inspections findings were a result of a data extract error when pulling the data for the audit. Specifically, manually pulling multiple years of data and matching up the last inspection date can result in errors if there was an off-cycle inspection that took place. In addition, two of the 76 Overhead Detailed Inspections findings were a result of mapping updates that resulted in the equipment number changing. See Attachment A.

The record review findings included 62 Padmount Underground Inspections past SDG&E's scheduled due date. Below is further explanation regarding these 62 inspections:

- 35 of the 62 of the Padmount Underground Inspections findings were within the 12 consecutive calendar months starting the first full calendar month after an inspection is performed, plus three full calendar months. As stated in GO 165, "the term "year" is defined as 12 consecutive calendar months starting the first full calendar month after an inspection is performed, plus three full calendar months, not to exceed the end of the calendar year in which the next inspection is due." However, it appears from SED's analysis that the inspection due date was interpreted as 15 months from the last inspection date, rather than 15 months from the first calendar month after the inspection was performed.

23 of the 62 of the Padmount Underground Inspections findings were a result of a data extract error when pulling the data for the audit, where an off-cycle inspection took place and

the last inspection date was not matched to the record correctly. Attachment A shows the other inspection data that was inadvertently left off the records report sent prior to the audit.

- One of the 62 Padmount Underground Inspections findings was a result of an equipment replacement. The install date of the new equipment was within the 12 consecutive calendar months starting the first full calendar month after an inspection is performed, plus three full calendar months. Due to the new equipment installation, the inspection timeline was reset and, therefore, was not due yet.
- Three of the 62 Padmount Underground Inspections findings were a result of an inspection cycle change. These three cycles changed from a three-year Subsurface inspection cycle to a five year Padmount inspection cycle. At the time these records were changed it was a manual process and these records were placed in the incorrect interval causing them to be late. We have since implemented additional controls and automations to prevent this from happening in the future. See Attachment A.

The record review findings included One Subsurface Underground Inspection past SDG&E's scheduled due date. New equipment was installed in this structure on 8/17/2021. Prior to the new equipment being installed, this structure was on SS10 cycle (Subsurface without Equipment internal detailed inspection - 10 year cycle), which reset this facility to a 3-year inspection cycle and the facility was inspected in January 2024. See Attachment A.

The record review findings also included work orders that were completed past SDG&E's assigned due date for corrective action. In accordance with General Order 95, Rule 18(B)(1)(b), under certain circumstances, facility and equipment repairs resulting from a maintenance inspection cannot be accomplished within the assigned due date for corrective action. SDG&E has a process in place where these occurrences are evaluated for a deferred status on an individual basis. The process ensures the work orders are continuously monitored to completion and escalated as required based on the individual circumstances. All of the work orders completed past the assigned due date were appropriately deferred as required by SDG&E's internal process requirements and in conformance with GO 95, Rule 18.

SDG&E has fully addressed the seven audit field findings. Six findings were repaired the same day they were discovered during the audit. One finding has an open repair work order scheduled to be repaired by May 2025.

SDG&E would appreciate if SED could review this response and reconsider the late 76 Overhead Detailed Inspections and 59 Padmount Underground Inspections findings for the reasons stated herein.

SDG&E valued the communication and dialogue with the engineers during the audit to understand your group's perspective on safety and compliance.

SDG&E provided the below attachment separately.

Attachment	Title
Attachment A	Attachment A_Audit Response_SDGE North Coast 2024 Passed Required GO 165 Detail Inspection Cycle

Sincerely,

Stacy Lovell-Garra

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Program Management Compliance Advisor