



February 27, 2025

Mr. Fadi Daye, P.E.  
Program and Project Supervisor  
Electric Safety and Reliability Branch  
Safety and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3298

**Subject: 2025 SDG&E Response to CPUC Orange County Transmission Audit**

Dear Mr. Daye:

San Diego Gas & Electric (SDG&E) appreciates the time Kyle King of the Electric Safety and Reliability Branch of the California Public Utilities Commission (CPUC) spent in the field in January 6-10, 2025, in SDG&E's Orange County District inspecting transmission structures and subsequently review inspection and maintenance records. The table below identifies findings Mr. King noted during fielding and review of records, and the corrective measures SDG&E took to remedy these findings.

CPUC Comment	SDGE Comment
SDG&E's records indicated that from 2022 to 2024, SDG&E did not complete 144 overhead work orders by SDG&E's own scheduled due date for corrective action.	In response to the audit finding that "SDG&E did not complete 144 overhead work orders by SDG&E's own scheduled due date for corrective action," we would like to provide further clarification for your consideration. Referring to file 20241218CPUCReportFinal.pdf, second tab "Sheet 1," Column O labeled Cstat indicates whether the work order received an approved deferral that extends the correction timeframe. Our internal standards and GO 95 Rule 18 (B)(1)(b) allow correction times to be extended under reasonable circumstances, such as third-party refusal, customer issue, no access, or permits. A deferral request for a work order is reviewed on a case-by-case basis and, if authorized, Column O labeled "Cstat" is updated with an "H" or a "D" label. Please note that SDG&E does not modify the due date in Column P when a hold is approved. Accordingly, the 144 records referenced in the audit report were labeled with an "H" status and remained in compliance with GO 95, 18 (B)(1)(b) timeframes or our internal due dates.

<p>SDG&amp;E had vegetation that needed to be cleared near the ground level of SDG&amp;E towers Z223152 and Z223154.</p>	<p>No vegetation in the right-of-way posed clearance or reliability issues and did not interfere with the inspection of structures. SDG&amp;E proactively manages tree clearance to ensure it does not encroach on the Minimum Vegetation Clearance Distance (MVCD). Vegetation near structures and spans is actively monitored with scheduled, proactive trimming, removal activities, and off-cycle reactive trimming and removal as identified through routine patrols. For awareness, SDG&amp;E follows strict environmental rules and regulations to avoid disturbing sensitive vegetation and to protect habitats, ensuring safety per GO95 Rule 31.1.</p>
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Items listed in your letter dated January 27<sup>th</sup>, 2025, have been addressed by SDG&E. If you have questions regarding these comments, please do not hesitate to contact myself at (619)-751-5256 or at [saguila2@sdge.com](mailto:saguila2@sdge.com) or Monica Curry at (619) 694-9323 or at [mcurry@sdge.com](mailto:mcurry@sdge.com)

Sincerely,  
Sandra Aguilar  
Team Lead - Substation & Transmission Compliance  
cc. Monica Curry SDG&E, Christian Henderson SDG&E