



July 11th, 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 Beach Cities 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 from April 21-25, 2025, in SDG&E's Beach Cities 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 indicate that from January 2023 to March 2025, SDG&E completed 31 overhead detailed inspections past SDG&E's scheduled due date.	Per SDG&E's Transmission Maintenance Practice, Section 4.3, inspections are conducted every three years and are scheduled according to the frequencies outlined in Section 4.2.1, "Transmission System Inspection Frequency." The maintenance practice states: "All scheduled inspections will be completed within ninety (90) days before or after the target date." The date reflected in our reports represents the target date. However, in accordance with our maintenance practice, an inspection is considered completed on time if it is performed within 90 days before or after this target date. Therefore, all inspections reported were completed within the allowable time window and are in full compliance with SDG&E's Transmission Maintenance Practice.

SDG&E's records indicate that from January 2023 to March 2025, SDG&E completed 24 underground detailed inspections past SDG&E's scheduled due date.	Per SDG&E's Transmission Maintenance Practice, Section 4.3, inspections are conducted every three years and are scheduled according to the frequencies outlined in Section 4.2.1, "Transmission System Inspection Frequency." The maintenance practice states: "All scheduled inspections will be completed within ninety (90) days before or after the target date." The date reflected in our reports represents the target date. However, in accordance with our maintenance practice, an inspection is considered completed on time if it is performed within 90 days before or after this target date. Therefore, all inspections reported were completed within the allowable time window and are in full compliance with SDG&E's Transmission Maintenance Practice.
SDG&E's records indicated that from January 2023 to March 2025, SDG&E did not complete 438 overhead work orders by SDG&E's own scheduled due date for corrective action.	SDG&E would like to provide further clarification for your consideration. Referring to file DR05_CPUCReport2025BCCPUC.xlsx, second tab "CPUCReport2025BC," Column O labeled Cstat indicates if a condition was previously put on hold or deferred. SDG&E's 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, 25 records referenced in the audit report were labeled with an "H" status and remained in compliance with GO 95, 18 (B)(1)(b) timeframes and our internal due dates according to Transmission Maintenance Practice, Section 6.1.1 Additionally, the 408 work orders with a blank due date were completed in the field during the inspection and 5 work orders had procedural data entry errors that caused status "H" to be missing from the column that have been corrected on the spreadsheet provided on July 9th, 2025.
The high voltage sign on Pole Z96118 was damaged.	SDG&E will repair the damaged high voltage sign on structure Z96118 in compliance with General Order 95 (GO 95) requirements.

Items listed in your letter dated June 11th, 2025, have been addressed or are in the process of being 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 or Monica Curry at (619) 694-9323 or at mcurry@sdge.com

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