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California Public Utilities Commission (CPUC)
Attn: Majed Ibrahim

RE: Electric Audit of SDG&E Beach Cities District - EA2026-1435

Mr. Ibrahim:

A General Order 165 Electric Distribution Audit/Inspection of SDG&E's Beach Cities Construction and Operation District (conducted by SED Engineer Mily Vaidya) was held from April 6-10, 2026. During the field inspection your staff identified a total of five overhead findings involving Communication Infrastructure Providers (CIPs), 19 SDG&E overhead findings and three SDG&E underground findings.

The record review identified 34 overdue overhead detailed inspections, one overdue grid patrol inspection, and nine overdue underground detailed inspections relative to SDG&E's scheduled due dates. Without admitting any violation of GO 165, Section III-B, GO 95, Rule 31.2, or GO 128, Rule 17.2, SDG&E provides the following response. Based on its records, SDG&E confirms that between February 2025 and May 2025, a total of 34 overhead detailed inspections, one grid patrol inspection, and nine underground detailed inspections were completed after their scheduled due dates; however, all were completed within one month of their respective GO 165 due dates. While SDG&E strives to complete inspections as close as possible to their assigned schedules, various factors may affect timely completion. These factors include, but are not limited to, severe weather events, customer-driven scheduling constraints, access challenges, permitting delays, and environmental considerations.

SDG&E has fully addressed all 22 SDG&E field findings and three CIP field findings. Of these, 20 corrective actions were completed on the same day the findings were identified during the audit. Two findings remain open, with associated repair work orders scheduled for completion by April 2029. For the remaining two CIP overhead findings, SDG&E has issued the appropriate notifications to the third parties responsible.

SDG&E appreciates the communication and dialogue shared with your engineering team during the audit.

Sincerely,

Stacy Lovell-Garra

Stacy Lovell-Garra, Program Management Compliance Advisor