

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



March 8, 2024

E20220901-01

[REDACTED]
Manager – Electric Assets & Compliance
San Diego Gas and Electric Company
[REDACTED]

Dear [REDACTED]:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (CPUC) submits the following **Notice of Violation (NOV)** as part of its investigation of an incident that occurred on August 31, 2022, at Dulzura. This incident resulted in the Border 32 Fire, which burned 4456 acres, deenergized 317 customers, and caused \$154,306.06 in damage to utility equipment.

SED found two instances in which San Diego Gas and Electric Company (SDG&E) violated GENERAL ORDER 95.

Please provide a response to the violation(s) within 30 calendar days. Include all corrective actions and preventive measures taken by SDG&E to remedy and prevent the recurrence of such violation(s). If you have any questions concerning this NOV, please contact Chris Lee at 415-602-6477 or by email at chris.lee@cpuc.ca.gov.

Sincerely,

Anthony Noll, Program Manager
Wildfire Safety and Enforcement Branch
Safety and Enforcement Division

Enclosure

CC:
Lee Palmer, Director
Safety and Enforcement Division

Chris Lee, Senior Utilities Engineer
Wildfire Safety and Enforcement Branch

Violations

General Order 95, Rule 19 - Cooperation with Commission Staff; Preservation of Evidence Related to Incidents Applicability of Rules states in part:

“Each utility shall provide full cooperation to Commission staff in an investigation into any major accident (as defined in Rule 17) or any reportable incident (as defined in CPUC Resolution E-4184), regardless of pending litigation or other investigations, including those which may be related to a Commission staff investigation. Once the scene of the incident has been made safe and service has been restored, each utility shall provide Commission staff upon request immediate access to:

- o Any factual or physical evidence under the utility or utility agent’s physical control, custody, or possession related to the incident...”*

Violation 1

WSEB’s investigation determined that SDG&E did not properly preserve evidence related to the Incident, when it gathered some of the damaged poles, cut them up into segments, and stacked them on top of one another in a container, which prohibited SED from accessing and identifying the damaged poles. Further, SDG&E did not properly preserve evidence related to the Incident when it gathered and stored unidentified segments of wires. In addition, SDG&E’s failure to properly preserve the evidence related to the Incident prohibited SED from evaluating the original damage to the poles and wiring due to the Incident. As a result, WSEB found SDG&E in violation of General Order 95, Rule 19 for failure to preserve and store evidence in a manner as to provide SED access to inspect and evaluate the evidence.

General Order 165 Part III(C) states in part:

“The utility shall maintain records for (1) at least ten (10) years of patrol and detailed inspection activities, ...

For all inspections records shall specify the circuit, area, facility or equipment inspected, the inspector, the date of the inspection, and any problems (or items requiring corrective action) identified during each inspection, as well as the scheduled date of corrective action.”

Violation 2

WSEB’s investigation determined that SDG&E did not maintain annual patrol inspection records in the SAP System for some of its poles, and that it did not specify the equipment inspected in its patrol inspection records in 2018. As a result, WSEB found SDG&E in violation of General Order 165 Part III(C) for the failure to maintain patrol inspection records and the failure to specify the equipment inspected.



[REDACTED]
Mgr – Electric Assets
& Compliance
8680 Balboa Ave
San Diego, CA 92123
[REDACTED]

April 3, 2024

Anthony Noll
Program Manager, Wildfire Safety and Enforcement Branch
California Public Utilities Commission
Via email: Anthony.noll@cpuc.ca.gov

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

Dear Mr. Noll:

San Diego Gas & Electric has reviewed the March 8, 2024 Notice of Violation (NOV) letter and requests that Safety and Enforcement Division (SED) reconsider the issuance of this NOV for the reasons stated herein.

First, the cover letter states that “This incident resulting in the Border 32 Fire, which burned 4456 acres, deenergized 317 customers, and caused \$154,306.06 in damage to utility equipment.” We wish to clarify that the incident reported by SDG&E was the property loss to SDG&E of \$154,306.06 resulting from the Border 32 Fire. SDG&E equipment was not the cause of the fire.

SDG&E Response to Violation 1

Violation 1 concludes that SDG&E did not properly preserve evidence because it “cut them up into segments and stacked them on top of one another in a container, which prohibited SED from accessing and identifying the damaged poles.”

In response, SDG&E asserts that on September 14, 2022, SDG&E did provide Commission staff, Ed Pike and Chris Lee, access to the evidence collected by the utility following the incident. At the time of the site visit, the evidence had only recently been collected and removed from the burn area and being stored at 20551 Campo Rd, Dulzura CA in a containment bin. SDG&E is not aware of any requests made during or after the site visit, that Commission staff wanted to view or further examine the physical evidence collected. If Commission Staff would like to examine

the evidence in greater detail, those materials are preserved at SDG&E's evidence locker for at least five years as required by Rule 19 and can be made available to SED upon request.

Moreover, the 14 utility poles that were placed in the bin included 1 steel and 13 wood poles. Each pole experienced various levels of damage due to the fire. To make the area safe, restore service and comply with the requirements of Assembly Bill No. 332, that outlines the management standards for storage, transport and disposal of treated wood waste, the poles were resized (as appropriate) and placed into proper containment for transport to SDG&E's evidence locker. Specifically, Assembly Bill 332, requires treated wood waste to be stored so it does not contact soil and can be covered to protect from precipitation. See [Bill Text - AB-332 Hazardous waste: treated wood waste: management standards. \(ca.gov\)](#).

In conclusion, SDG&E does not agree that it is in violation of General Order 95 Rule 19, in its cooperation with Commission staff during its investigation of this incident or the collection and handling of the physical evidence collected following the Border 32 Fire.

SDG&E Response to Violation 2

Violation 2 concludes that "SDG&E did not maintain annual patrol inspection records in the SAP System for some of its poles, and that it did not specify the equipment inspected in its patrol inspection records in 2018."

While SDG&E does admit that the data request response did contain some errors, we do have those patrol records and apologize for the mistake. Below are further details regarding the errors made in the original response.

As part of Data Request SED-01 Question 7, SDG&E provided patrol records for the last five years (2018-2022) for the 14 poles affected by the Border 32 Fire with the exception of a missing record for P873035 for year 2018 that was inadvertently omitted.

In addition, we noted in our response that there was a technical error where a script did accurately write the individual pole numbers located in the "Functional Location" map area into the "Description" section of the record. This error occurred for the following poles and years:

P873040 – 2021
P873042 – 2021
P874585 – 2021
P873039 – 2021, 2019
P873041 – 2021
P873035 – 2019
P175963 – 2021
P971188 – 2021

With that said, our SAP record-keeping system for patrol inspections is organized by "area," identified as the "Functional Location," rather than by equipment, which is in compliance with General Order 165 Part III(C) which states "For all inspections, records shall specify the circuit,

area, facility or equipment inspected, the inspector, the date of the inspection, and any problems..." (emphasis added).

So, while there was a system error listing the pole numbers in the Description text box in SAP, the record still includes the inspector, the date of the inspection and the **area** inspected.

SDG&E does understand that this may have been confusing to the investigators reviewing the data request submittal, but we did not realize there were any concerns regarding the completeness of the patrol records until we received this NOV. To resolve this issue, we have included the screenshot for the one record mistakenly omitted as Attachment A. In addition, we compiled a patrol inspection report at the equipment level, rather than the area for the 14 poles for 2018-2022 and provided that as Attachment B to this letter. We hope this additional information and clarification sufficiently resolves the Violation 2 finding and apologize for the errors and confusion in our original data request response.

SDG&E would appreciate if SED could review this response and reconsider the two Violation findings.

Please let us know if a meeting would help resolve any remaining questions or concerns from your incident investigators.

Sincerely,

[REDACTED]

Manager, Electric Assets & Compliance

cc: Leslie Palmer, CPUC
Chris Lee, CPUC
Ed Pike, CPUC
Layla Labagh, CPUC
Irene Moosen, CPUC
Amy Yip-Kikugawa

[REDACTED]

ATTACHMENT A

Notification	100011657896	1D	PATROL Y1 INTERVAL 02	
Notific. Status	NOCO		COMP	
<div>Notification Header Location Maintenance Plan</div>				
Reference object				
Functional loc.	ED.MTE.MAPS.1408	ED:STD:MAP:17340-118380		
Equipment				
Assembly				
Subject				
Work Type	SDED-PA	199	Patrol Inspection	
Description	PATROL Y1 INTERVAL 02			
02/09/2018 08:32:10 PST (LBOURGEO) Phone Inspected by #11614 on 2/8/18, no infracations found.				
Start/End Dates				
Required Start	02/01/2018	00:00:00	Priority	no value default
Required End	05/31/2018	00:00:00		
Revision		SDGE		
Responsibilities				
Planner group	/	SDGE		
Main WorkCtr	EDU_MTE	/	SDED	MOUNTAIN EMPIRE ELEC UG
Job Owner	5632			
Job Owner	5632			
Reported by	11614	Notif.date	01/25/2018	01:34:14

ATTACHMENT B

STRUCTURE ID	Notification	COMPLETED DATE	Description	COMPLETED BY	Condition Code
P873040	100011657903	02/08/2018	PATROL Y1 INTERVAL 02	JDUKES	No Findings
P873040	100013648510	02/19/2019	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P873040	100017437086	02/07/2020	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P873040	100019309543	02/04/2021	PATROL Y1 INTERVAL 02	CWELDY	No Findings
P873040	100021253056	02/06/2022	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P874627	100011657909	02/08/2018	PATROL Y1 INTERVAL 02	JDUKES	No Findings
P874627	100013648516	02/19/2019	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P874627	100017437092	02/07/2020	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P874627	100019309543	02/04/2021	PATROL Y1 INTERVAL 02	CWELDY	No Findings
P874627	100021253062	02/06/2022	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P874628	100011657909	02/08/2018	PATROL Y1 INTERVAL 02	JDUKES	No Findings
P874628	100013648516	02/19/2019	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P874628	100017437092	02/07/2020	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P874628	100019309543	02/04/2021	PATROL Y1 INTERVAL 02	CWELDY	No Findings
P874628	100021253062	02/06/2022	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P874589	100011657909	02/08/2018	PATROL Y1 INTERVAL 02	JDUKES	No Findings
P874589	100013648516	02/19/2019	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P874589	100017437092	02/07/2020	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P874589	100019309543	02/04/2021	PATROL Y1 INTERVAL 02	CWELDY	No Findings
P874589	100021253062	02/06/2022	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P874588J	100011657909	02/08/2018	PATROL Y1 INTERVAL 02	JDUKES	No Findings
P874588J	100013648516	02/19/2019	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P874588J	100017437092	02/07/2020	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P874588J	100019309543	02/04/2021	PATROL Y1 INTERVAL 02	CWELDY	No Findings
P874588J	100021253062	02/06/2022	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P873042	100011657903	02/08/2018	PATROL Y1 INTERVAL 02	JDUKES	No Findings
P873042	100013648510	02/19/2019	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P873042	100017437086	02/07/2020	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P873042	100019309543	02/04/2021	PATROL Y1 INTERVAL 02	CWELDY	No Findings
P873042	100021253056	02/06/2022	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P874585	100011657903	02/08/2018	PATROL Y1 INTERVAL 02	JDUKES	No Findings
P874585	100013648510	02/19/2019	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P874585	100017437086	02/07/2020	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P874585	100019309543	02/04/2021	PATROL Y1 INTERVAL 02	CWELDY	No Findings
P874585	100021253056	02/06/2022	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P873039	100011657903	02/08/2018	PATROL Y1 INTERVAL 02	JDUKES	No Findings
P873039	100013648510	02/19/2019	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P873039	100017437086	02/07/2020	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P873039	100019309543	02/04/2021	PATROL Y1 INTERVAL 02	CWELDY	No Findings
P873039	100021253056	02/06/2022	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings

STRUCTURE ID	Notification	COMPLETED DATE	Description	COMPLETED BY	Condition Code
P873041	100011657903	02/08/2018	PATROL Y1 INTERVAL 02	JDUKES	No Findings
P873041	100013648510	02/19/2019	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P873041	100017437086	02/07/2020	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P873041	100019309543	02/04/2021	PATROL Y1 INTERVAL 02	CWELDY	No Findings
P873041	100021253056	02/06/2022	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P873035	100011657896	02/08/2018	PATROL Y1 INTERVAL 02	JDUKES	No Findings
P873035	100013648503	02/19/2019	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P873035	100017437079	02/07/2020	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P873035	100019309536	02/04/2021	PATROL Y1 INTERVAL 02	CWELDY	No Findings
P873035	100021253050	02/06/2022	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P175963	100011657893	02/08/2018	PATROL Y1 INTERVAL 02	JDUKES	No Findings
P175963	100013648500	02/19/2019	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P175963	100017437076	02/07/2020	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P175963	100019309533	02/04/2021	PATROL Y1 INTERVAL 02	CWELDY	No Findings
P175963	100021253047	02/06/2022	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P971188	100011657893	02/08/2018	PATROL Y1 INTERVAL 02	JDUKES	No Findings
P971188	100013648500	02/19/2019	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P971188	100017437076	02/07/2020	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P971188	100019309533	02/04/2021	PATROL Y1 INTERVAL 02	CWELDY	No Findings
P971188	100021253047	02/06/2022	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P175953	100011657894	02/08/2018	PATROL Y1 INTERVAL 02	JDUKES	No Findings
P175953	100013648501	02/19/2019	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P175953	100017437077	02/07/2020	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P175953	100019309534	02/04/2021	PATROL Y1 INTERVAL 02	CWELDY	No Findings
P175953	100021253048	02/06/2022	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P874629	100011657909	02/08/2018	PATROL Y1 INTERVAL 02	JDUKES	No Findings
P874629	100013648516	02/19/2019	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P874629	100017437092	02/07/2020	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings
P874629	100019309543	02/04/2021	PATROL Y1 INTERVAL 02	CWELDY	No Findings
P874629	100021253062	02/06/2022	PATROL Y1 INTERVAL 02	RMCGHEN	No Findings

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



July 12, 2024

CPUC-ID: E20220901-01

[REDACTED]
Manager – Electric Assets & Compliance
San Diego Gas and Electric Company (SDG&E)
[REDACTED]

Dear [REDACTED]:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission (CPUC) has reviewed SDG&E's response, dated April 3, 2024, to the Notice of Violation (NOV) issued to the utility on March 4, 2024, regarding the Border 32 Fire incident.

SED's investigation of the Border 32 Fire identified the following two (2) violations: one (1) violation of General Order (GO) 95 Rule 19; and one (1) violation of GO 165 Part III(C).

SED provides additional clarification and context to address the arguments raised in SDG&E's response to the NOV, and requests additional information for further evaluation. Attached is the summary of relevant code sections, SED's findings, SDG&E's responses, and SED's evaluation of each of SDG&E's responses.

Please provide a response to this letter within 30 calendar days. If you have any questions, please contact Chris Lee at (415) 602-6477 or chris.lee@cpuc.ca.gov.

Sincerely,

Nathan Sarina
Program and Project Supervisor Wildfire Safety and Enforcement Branch
Safety and Enforcement Division

Enclosure

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

Border 32 Fire
Summary of Violations

The table below summarizes SDG&E's response and SED's evaluation of the response for the two (2) violations listed in the NOV Letter for the Border 32 Fire, issued on March 4, 2024.

Violation #	GO and Rule / Part	SDG&E Agree/Disagree	SED Evaluation
1.	GO 95 Rule 19	Disagree	Pending Further Evaluation
2.	GO 165 Part III(C)	Disagree	Pending Further Evaluation

GO 95, Rule 19 - Cooperation with Commission Staff; Preservation of Evidence Related to Incidents Applicability of Rules states in part:

Each utility shall provide full cooperation to Commission staff in an investigation into any major accident (as defined in Rule 17) or any reportable incident (as defined in CPUC Resolution E-4184), regardless of pending litigation or other investigations, including those which may be related to a Commission staff investigation. Once the scene of the incident has been made safe and service has been restored, each utility shall provide Commission staff upon request immediate access to:

o Any factual or physical evidence under the utility or utility agent's physical control, custody, or possession related to the incident...

Violation 1

WSEB's investigation determined that SDG&E did not properly preserve evidence related to the Incident, when it gathered some of the damaged poles, cut them up into segments, and stacked them on top of one another in a container, which prohibited SED from accessing and identifying the damaged poles. Further, SDG&E did not properly preserve evidence related to the Incident when it gathered and stored unidentified segments of wires. In addition, SDG&E's failure to properly preserve the evidence related to the Incident prohibited SED from evaluating the original damage to the poles and wiring due to the Incident. As a result, WSEB found SDG&E in violation of General Order 95, Rule 19 for failure to preserve and store evidence in a manner as to provide SED access to inspect and evaluate the evidence.

SDG&E's Response to Violation #1

"Violation 1 concludes that SDG&E did not properly preserve evidence because it 'cut them up into segments and stacked them on top of one another in a container, which prohibited SED from accessing and identifying the damaged poles.'

In response, SDG&E asserts that on September 14, 2022, SDG&E did provide Commission staff, Ed Pike and Chris Lee, access to the evidence collected by the utility following the incident. At the time of the site visit, the evidence had only recently been collected and removed from the burn area and being stored at 20551 Campo Rd, Dulzura CA in a containment bin. SDG&E is not aware of any requests made during or after the site visit, that Commission staff wanted to view or further examine the physical evidence collected. If Commission Staff would like to examine the

evidence in greater detail, those materials are preserved at SDG&E's evidence locker for at least five years as required by Rule 19 and can be made available to SED upon request.

Moreover, the 14 utility poles that were placed in the bin included 1 steel and 13 wood poles. Each pole experienced various levels of damage due to the fire. To make the area safe, restore service and comply with the requirements of Assembly Bill No. 332, that outlines the management standards for storage, transport and disposal of treated wood waste, the poles were resized (as appropriate) and placed into proper containment for transport to SDG&E's evidence locker. Specifically, Assembly Bill 332, requires treated wood waste to be stored so it does not contact soil and can be covered to protect from precipitation. See [Bill Text - AB-332 Hazardous waste: treated wood waste: management standards. \(ca.gov\)](#).

In conclusion, SDG&E does not agree that it is in violation of General Order 95 Rule 19, in its cooperation with Commission staff during its investigation of this incident or the collection and handling of the physical evidence collected following the Border 32 Fire."

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

3. Photographs of the evidence at the evidence locker showing equipment ID numbers (provide description where ID number is not applicable or unavailable).
4. Evidence log / chain of custody documentation.

SED may decide at a later time to examine the evidence at SDG&E's evidence locker.

GO 165 Part III(C) states in part:

The utility shall maintain records for (1) at least ten (10) years of patrol and detailed inspection activities, ...

For all inspections records shall specify the circuit, area, facility or equipment inspected, the inspector, the date of the inspection, and any problems (or items requiring corrective action) identified during each inspection, as well as the scheduled date of corrective action.

Violation 2

WSEB's investigation determined that SDG&E did not maintain annual patrol inspection records in the SAP System for some of its poles, and that it did not specify the equipment inspected in its patrol inspection records in 2018. As a result, WSEB found SDG&E in violation of General Order 165 Part III(C) for the failure to maintain patrol inspection records and the failure to specify the equipment inspected.

SDG&E's Response to Violation #2

"Violation 2 concludes that 'SDG&E did not maintain annual patrol inspection records in the SAP System for some of its poles, and that it did not specify the equipment inspected in its patrol inspection records in 2018.'

While SDG&E does admit that the data request response did contain some errors, we do have those patrol records and apologize for the mistake. Below are further details regarding the errors made in the original response.

As part of Data Request SED-01 Question 7, SDG&E provided patrol records for the last five years (2018-2022) for the 14 poles affected by the Border 32 Fire with the exception of a missing record for P873035 for year 2018 that was inadvertently omitted.

In addition, we noted in our response that there was a technical error where a script did [sic] accurately write the individual pole numbers located in the "Functional Location" map area into the "Description" section of the record. This error occurred for the following poles and years:

P873040 – 2021
P873042 – 2021
P874585 – 2021
P873039 – 2021, 2019
P873041 – 2021
P873035 – 2019

P175963 – 2021
P971188 – 2021

With that said, our SAP record-keeping system for patrol inspections is organized by “area,” identified as the “Functional Location,” rather than by equipment, which is in compliance with General Order 165 Part III(C) which states “For all inspections, records shall specify the circuit area, facility or equipment inspected, the inspector, the date of the inspection, and any problems...” (emphasis added).

So, while there was a system error listing the pole numbers in the Description text box in SAP, the record still includes the inspector, the date of the inspection and the **area** inspected.

SDG&E does understand that this may have been confusing to the investigators reviewing the data request submittal, but we did not realize there were any concerns regarding the completeness of the patrol records until we received this NOV. To resolve this issue, we have included the screenshot for the one record mistakenly omitted as Attachment A. In addition, we compiled a patrol inspection report at the equipment level, rather than the area for the 14 poles for 2018-2022 and provided that as Attachment B to this letter. We hope this additional information and clarification sufficiently resolves the Violation 2 finding and apologize for the errors and confusion in our original data request response.”

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: 17340-118380¹) 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:

¹ SED includes this information because SED is uncertain whether or not it is part of the Function Location ID.

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.
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.
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.

Attachment A

Screenshots of Annual Patrol Inspection Records from the P873035 Tab

Notification: 100021253050 ID: PATROL Y1 INTERVAL 02

Notific. Status: NOCO COMP

Notification Header Location Maintenance Plan

Reference object

Functional loc. ED.MTE.MAPS.1408 ED-STD:MAP:17340-118380

Equipment

Assembly

Subject

Work Type SDED-PA 199 Patrol Inspection

Description PATROL Y1 INTERVAL 02

02/08/2022 08:04:16 PST POP PO Interface Logonid (POPRD200)
P473324, RMCCHEN, 06-FEB-22; P873033, RMCCHEN, 06-FEB-22; P873034, RMCCHEN, 06-FEB-22; P873035, RMCCHEN, 06-FEB-22; P873036, RMCCHEN, 06-FEB-22; P873776, RMCCHEN, 06-FEB-22; P875532, RMCCHEN, 06-FEB-22;

Start/End Dates

Required Start 02/01/2022 00:00:00 Priority no value default

Required End 05/31/2022 00:00:00

Revision SDGE

Responsibilities

Planner group / SDGE

Main WorkCtr EDU_MTE / SDED MOUNTAIN EMPIRE ELEC UG

Job Owner 2388

Job Owner 2388

Reported by RMCCHEN Notif.date 01/25/2022 01:16:34

... **P873035** P175963 P971188 P175953 P874629

Figure 1. Screenshot of the 2022 annual patrol inspection record.

Notification	100019309536	1D	PATROL Y1 INTERVAL 02	
Notific. Status	NOCO		COMP	
<div> Notification Header Location Maintenance Plan </div>				
Reference object				
Functional loc.	ED.MTE.MAPS.1408	ED:STD:MAP:17340-118380		
Equipment				
Assembly				
Subject				
Work Type	SDED-PA	199	Patrol Inspection	
Description	PATROL Y1 INTERVAL 02			
<div> 02/05/2021 11:18:57 PST POP PO Interface Logonid (POPRD200) P473324,CWELDY,04-FEB-21;P873033,CWELDY,04-FEB-21;P873034,CWELDY,04-FEB-21; P873035,CWELDY,04-FEB-21;P873036,CWELDY,04-FEB-21;P87377 6,ASIMMON1,05-FEB-21;P875532,CWELDY,04-FEB-21; </div>				
Start/End Dates				
Required Start	02/01/2021	00:00:00	Priority	no value default
Required End	05/31/2021	00:00:00		
Revision		SDGE		
Responsibilities				
Planner group		/	SDGE	
Main WorkCtr	EDU_MTE	/	SDGE	MOUNTAIN EMPIRE ELEC UG
Job Owner	2388			
Job Owner	2388			
Reported by	ASIMMON1	Notif.date	01/25/2021	01:22:45

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P175963
P971188
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Figure 2. Screenshot of the 2021 annual patrol inspection record.

Notification	100017437079	1D	PATROL Y1 INTERVAL 02	
Notific. Status	NOCO		COMP	
<div> <div>Notification Header</div> <div>Location</div> <div>Maintenance Plan</div> </div>				
Reference object				
Functional loc.	ED.MTE.MAPS.1408	ED:STD:MAP:17340-118380		
Equipment				
Assembly				
Subject				
Work Type	SD-PA	199	Patrol Inspection	
Description	PATROL Y1 INTERVAL 02			
<div> 02/07/2020 11:09:15 PST PIP PI Interface Logonid (PIPRD200) P473324,RMCGHEN,07-FEB-20;P873033,RMCGHEN,07-FEB-20;P873034,RMCGHEN,07-FEB-20;P873035,RMCGHEN,07-FEB-20;P873036,RMCGHEN,07-FEB-20;P873776,RMCGHEN,07-FEB-20;P875532,RMCGHEN,07-FEB-20; </div>				
Start/End Dates				
Required Start	02/01/2020	00:00:00	Priority	no value default
Required End	05/30/2020	00:00:00		
Revision		SDGE		
Responsibilities				
Planner group		/ SDGE		
Main WorkCtr	EDU_MTE	/ SDGE	MOUNTAIN EMPIRE ELEC UG	
Job Owner	5632			
Job Owner	5632			
Reported by	RMCGHEN	Notif.date	01/25/2020	02:12:33

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Figure 3. Screenshot of the 2020 annual patrol inspection record.

Notification	100013648503 1D PATROL Y1 INTERVAL 02		
Notific. Status	NOCO		COMP
<div> Notification Header Location Maintenance Plan </div>			
Reference object			
Functional loc.	ED.MTE.MAPS.1408	ED:STD:MAP:17340-118380	
Equipment			
Assembly			
Subject			
Work Type	SDED-PA	199 Patrol Inspection	
Description	PATROL Y1 INTERVAL 02		
02/19/2019 14:39:57 PST PIP PI Interface Logonid (PIPRD200) P873776,RMCGHEN,19-FEB-19;P875532,RMCGHEN,19-FEB-19; P175923,RMCGHEN,19-FEB-19;P175924,RMCGHEN,19-FEB-19;P175925,RMCGHEN,19-FEB-19;			
Start/End Dates			
Required Start	02/01/2019	00:00:00	Priority no value default ▼
Required End	05/31/2019	00:00:00	
Revision		SDGE	
Responsibilities			
Planner group	/ SDGE		
Main WorkCtr	EDU_MTE	/ SDED	MOUNTAIN EMPIRE ELEC UG
Job Owner	5632		
Job Owner	5632		
Reported by	RMCGHEN	Notif.date	01/25/2019 01:47:42

Figure 4. Screenshot of the 2019 annual patrol inspection record.

Attachment B

Screenshots of Annual Patrol Inspection Records from the P971188 Tab

Notification	100021253047	1D	PATROL Y1 INTERVAL 02	
Notific. Status	NOCO		COMP	
<div> Notification Header Location Maintenance Plan </div>				
Reference object				
Functional loc.	ED.MTE.MAPS.1375	ED:STD:MAP:17325-118370		
Equipment				
Assembly				
Subject				
Work Type	SDED-PA	199	Patrol Inspection	
Description	PATROL Y1 INTERVAL 02			
02/08/2022 08:04:14 PST POP PO Interface Logonid (POPRD200) P175551,RMCGHEN,06-FEB-22;P175955,RMCGHEN,06-FEB-22;P175956,RMCGHEN,06-FEB-22;P175957,RMCGHEN,06-FEB-22;P175962,RMCGHEN,06-FEB-22;P175963,RMCGHEN,06-FEB-22;P873210,RMCGHEN,06-FEB-22;P971188,RMCGHEN,06-FEB-22;				
Start/End Dates				
Required Start	02/01/2022	00:00:00	Priority	no value default
Required End	05/31/2022	00:00:00		
Revision		SDGE		
Responsibilities				
Planner group		/	SDGE	
Main WorkCtr	EDU_MTE	/	SDED	MOUNTAIN EMPIRE ELEC UG
Job Owner	2388			
Job Owner	2388			
Reported by	RMCGHEN	Notif.date	01/25/2022	01:16:34

.. P874585 | P873039 | P873041 | P873035 | P175963 | **P971188** | P175953 | P87

Figure 1. Screenshot of the 2022 annual patrol inspection record.

Notification	100019309533	1D	PATROL Y1 INTERVAL 02	
Notific. Status	NOCO		COMP	
<div> Notification Header Location Maintenance Plan </div>				
Reference object				
Functional loc.	ED.MTE.MAPS.1375	ED:STD:MAP:17325-118370		
Equipment				
Assembly				
Subject				
Work Type	SDDED-PA	199	Patrol Inspection	
Description	PATROL Y1 INTERVAL 02			
<div> 02/04/2021 11:19:13 PST POP PO Interface Logonid (POPRD200) P205209,CWELDY,04-FEB-21;P873037,CWELDY,04-FEB-21;P873038,CWELDY,04-FEB-21;P873039,CWELDY,04-FEB-21;P873040,CWELDY,04-FEB-21;P873041,CWELDY,04-FEB-21;P873042,CWELDY,04-FEB-21;P874585,CWELDY,04-FEB-21;P874586,CWELDY,04-FEB-21; </div>				
Start/End Dates				
Required Start	02/01/2021	00:00:00	Priority	no value default
Required End	05/31/2021	00:00:00		
Revision		SDGE		
Responsibilities				
Planner group		/	SDGE	
Main WorkCtr	EDU_MTE	/	SDDED	MOUNTAIN EMPIRE ELEC UG
Job Owner	2388			
Job Owner	2388			
Reported by	CWELDY		Notif.date	01/25/2021 01:22:45

75963 | P971188 | P175953 | P874629 | + | ◀

Figure 2. Screenshot of the 2021 annual patrol inspection record.

Notification	100017437076		1D	PATROL Y1 INTERVAL 02	
Notific. Status	NOCO			COMP	
<div> Notification Header Location Maintenance Plan </div>					
Reference object					
Functional loc.	ED.MTE.MAPS.1375		ED:STD:MAP:17325-118370		
Equipment					
Assembly					
Subject					
Work Type	SDED-PA	199	Patrol Inspection		
Description	PATROL Y1 INTERVAL 02				
02/07/2020 11:09:19 PST PIP PI Interface Logonid (PIPRD200) P175551,RMCGHEN,07-FEB-20;P175955,RMCGHEN,07-FEB-20;P175956,RMCGHEN,07-FEB-20;P175957,RMCGHEN,07-FEB-20;P175958,RMCGHEN,07-FEB-20;P175962,RMCGHEN,07-FEB-20;P175963,RMCGHEN,07-FEB-20;P873210,RMCGHEN,07-FEB-20;P971188,RMCGHEN,07-FEB-20;					
Start/End Dates					
Required Start	02/01/2020	00:00:00	Priority	no value default	
Required End	05/30/2020	00:00:00			
Revision		SDGE			
Responsibilities					
Planner group		/ SDGE			
Main WorkCtr	EDU_MTE	/ SDED	MOUNTAIN EMPIRE ELEC UG		
Job Owner	5632				
Job Owner	5632				
Reported by	RMCGHEN		Notif.date	01/25/2020	02:12:33

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P175953
P874629
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Figure 3. Screenshot of the 2020 annual patrol inspection record.

Notification	100013648500	1D	PATROL Y1 INTERVAL 02	
Notific. Status	NOCO		COMP	
<div> Notification Header Location Maintenance Plan </div>				
Reference object				
Functional loc.	ED.MTE.MAPS.1375	ED:STD:MAP:17325-118370		
Equipment				
Assembly				
Subject				
Work Type	SDED-PA	199	Patrol Inspection	
Description	PATROL Y1 INTERVAL 02			
<div> 02/19/2019 14:39:57 PST PIP PI Interface Logonid (PIPRD200) 175962,RMCGHEN,19-FEB-19;P175963,RMCGHEN,19-FEB-19;P873210,RMCGHEN,19-FEB-19; <u>P971188,RMCGHEN,19-FEB-19;</u> P175939,RMCGHEN,19-FEB-19;P177458,RMCGHEN,19-FEB-19;P177459,RMCGHEN,19-FEB-19; P177460,RMCGHEN,19-FEB-19;P246412,RMCGHEN,19-FEB-19;P </div>				
Start/End Dates				
Required Start	02/01/2019	00:00:00	Priority	no value default ▼
Required End	05/31/2019	00:00:00		
Revision		SDGE		
Responsibilities				
Planner group		/	SDGE	
Main WorkCtr	EDU_MTE	/	SDED	MOUNTAIN EMPIRE ELEC UG
Job Owner	5632			
Job Owner	5632			
Reported by	RMCGHEN		Notif.date	01/25/2019 01:47:42

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Figure 4. Screenshot of the 2019 annual patrol inspection record.

2018

Notification	100011657893	1D	PATROL Y1 INTERVAL 02	
Notific. Status	NOCO		COMP	
<div>Notification Header Location Maintenance Plan</div>				
Reference object				
Functional loc.	ED.MTE.MAPS.1375	ED:STD:MAP:17325-118370		
Equipment				
Assembly				
Subject				
Work Type	SDED-PA	199	Patrol Inspection	
Description	PATROL Y1 INTERVAL 02			
<p>02/09/2018 08:47:52 PST [REDACTED] (LBOURGEO) Phone [REDACTED] Inspected by [REDACTED] #11614 on 2/8/18, infraction found on P175958 code i246 pole is full of wood pecker holes</p> 				
Start/End Dates				
Required Start	02/01/2018	00:00:00	Priority	no value default
Required End	05/31/2018	00:00:00		
Revision		SDGE		
Responsibilities				
Planner group		/ SDGE		
Main WorkCtr	EDU_MTE	/ SDED	MOUNTAIN EMPIRE ELEC UG	
Job Owner	5632	[REDACTED]		
Job Owner	5632	[REDACTED]		
Reported by	11614	Notif.date	01/25/2018	01:34:14

P971188 P175953 ... + : ◀

Figure 5. Screenshot of the 2018 annual patrol inspection record.

Attachment C

Poles That Appear in Two Different Functional Locations in 2021 and 2022

2022 Records

2022

Notification 100021253056 1D PATROL Y1 INTERVAL 02

Notific. Status NOCO COMP

Notification Header Location Maintenance Plan

Reference object

Functional loc. ED.MTE.MAPS.1440 ED:STD:MAP:17355-118380

Equipment

Assembly

Subject

Work Type SDED-PA 199 Patrol Inspection

Description PATROL Y1 INTERVAL 02

02/08/2022 08:04:19 PST POP PO Interface Logonid (POPRD200)
P205209, RMC GHEN, 06-FEB-22; P873037, RMC GHEN, 06-FEB-22; P873038, RMC GHEN, 06-FEB-22; P873039, RMC GHEN, 06-FEB-22; P873040, RMC GHEN, 06-FEB-22; P873041, RMC GHEN, 06-FEB-22; P873042, RMC GHEN, 06-FEB-22; P874585, RMC GHEN, 06-FEB-22; P874586, RMC GHEN, 06-FEB-22;

Start/End Dates

Required Start 02/01/2022 00:00:00 Priority no value default

Required End 05/31/2022 00:00:00

Revision SDGE

Responsibilities

Planner group / SDGE

Main WorkCtr EDU_MTE / SDED MOUNTAIN EMPIRE ELEC UG

Job Owner 2388

Job Owner 2388

Reported by RMC GHEN Notif.date 01/25/2022 01:16:34

2021NOTE: This pole was patrolled but there were data issues where the pole was not written into the long text of the notification in SAP.

P874628 P874589 P874588J P873042 P874585 P873039

Figure 1. Screenshot of the 2022 annual patrol inspection record from tab P874585. SED added the red rectangle for emphasis.

2022

Notification 100021253056 1D PATROL Y1 INTERVAL 02

Notific. Status NOCO COMP

Notification Header Location Maintenance Plan

Reference object

Functional loc. ED.MTE.MAPS.1440 ED:STD:MAP:17355-118380

Equipment

Assembly

Subject

Work Type SDED-PA 199 Patrol Inspection

Description PATROL Y1 INTERVAL 02

02/08/2022 08:04:19 PST POP PO Interface Logonid (POPRD200)
P205209, RMC GHEN, 06-FEB-22; P873037, RMC GHEN, 06-FEB-22; P873038, RMC GHEN, 06-FEB-22; P873039, RMC GHEN, 06-FEB-22; P873040, RMC GHEN, 06-FEB-22; P873041, RMC GHEN, 06-FEB-22; P873042, RMC GHEN, 06-FEB-22; P874585, RMC GHEN, 06-FEB-22; P874586, RMC GHEN, 06-FEB-22;

Start/End Dates

Required Start 02/01/2022 00:00:00 Priority no value default

Required End 05/31/2022 00:00:00

Revision SDGE

Responsibilities

Planner group / SDGE

Main WorkCtr EDU_MTE / SDED MOUNTAIN EMPIRE ELEC UG

Job Owner 2388

Job Owner 2388

Reported by RMC GHEN Notif.date 01/25/2022 01:16:34

2021NOTE: This pole was patrolled but there were data issues where the pole was not written into the long text of the notification in SAP.

P874627 P874628 P874589 P874588J P873042 P874585

Figure 2. Screenshot of the 2022 annual patrol inspection record from tab P873042. SED added the red rectangle for emphasis.

2022

Notification
100021253056
1D
PATROL Y1 INTERVAL 02

Notific. Status
NOCO
COMP

Notification Header
Location
Maintenance Plan

Reference object

Functional loc.
ED.MTE.MAPS.1440
ED:STD:MAP:17355-118380

Equipment

Assembly

Subject

Work Type
SD-PA
199
Patrol Inspection

Description

PATROL Y1 INTERVAL 02
02/08/2022 08:04:19 PST POP PO Interface Logonid (POPRD200)
P205209, RMC GHEN, 06-FEB-22; P873037, RMC GHEN, 06-FEB-22; P873038, RMC GHEN, 06-FEB-22; P873039, RMC GHEN, 06-FEB-22; P873040, RMC GHEN, 06-FEB-22; P873041, RMC GHEN, 06-FEB-22; P873042, RMC GHEN, 06-FEB-22; P874585, RMC GHEN, 06-FEB-22; P874586, RMC GHEN, 06-FEB-22;

Start/End Dates

Required Start
02/01/2022
00:00:00
Priority
no value default

Required End
05/31/2022
00:00:00

Revision
SDGE

Responsibilities

Planner group
/ SDGE

Main WorkCtr
EDU_MTE
/ SD-ED
MOUNTAIN EMPIRE ELEC UG

Job Owner
2388

Job Owner
2388

Reported by
RMC GHEN
Notif. date
01/25/2022
01:16:34

2021NOTE: This pole was patrolled but there were data issues where the pole was not written into the long text of the notification in SAP.

Pole Info
P873040
P874627
P874628
P874589
P874588J
P

Figure 3. Screenshot of the 2022 annual patrol inspection record from tab P873040. SED added the red rectangle for emphasis.

2021 Record

Notification	100019309533	1D	PATROL Y1 INTERVAL 02
Notific. Status	NOCO	COMP	
<div>Notification Header</div> <div>Location</div> <div>Maintenance Plan</div>			
Reference object			
Functional loc.	ED.MTE.MAPS.1375	ED:STD:MAP:17325-118370	
Equipment			
Assembly			
Subject			
Work Type	SDDED-PA	199	Patrol Inspection
Description	PATROL Y1 INTERVAL 02		
02/04/2021 11:19:13 PST POP PO Interface Logonid (POPRD200) P205209,CWELDY,04-FEB-21;P873037,CWELDY,04-FEB-21;P873038,CWELDY,04-FEB-21;P873039,CWELDY,04-FEB-21;P873040,CWELDY,04-FEB-21;P873041,CWELDY,04-FEB-21;P873042,CWELDY,04-FEB-21;P874585,CWELDY,04-FEB-21;P874586,CWELDY,04-FEB-21;			
Start/End Dates			
Required Start	02/01/2021	00:00:00	Priority no value default
Required End	05/31/2021	00:00:00	
Revision		SDGE	
Responsibilities			
Planner group		/ SDGE	
Main WorkCtr	EDU_MTE	/ SDED	MOUNTAIN EMPIRE ELEC UG
Job Owner	2388		
Job Owner	2388		
Reported by	CWELDY	Notif.date	01/25/2021 01:22:45

Figure 4. Screenshot of the 2021 annual patrol inspection record from tab P971188. SED added the red rectangles for emphasis.



██████████
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

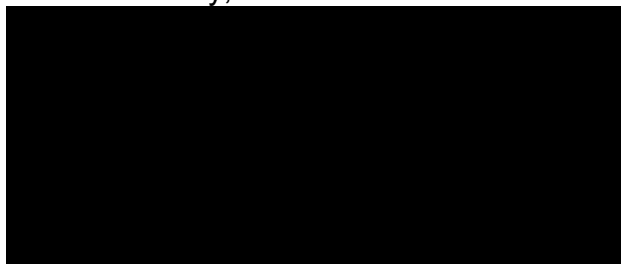
For SDG&E field/administrative staff to verify the previous poles within a particular map grid, first the list of poles (or other structure type) to be evaluated would need to be extracted from SAP in a transaction that lists the "Facility Map/ED:STD:MAP". Then that list of facility maps will be tied 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

Attachment A



SDG&E
DIGITAL
EVIDENCE
LOG

CASE NAME: BORDER FIRE

LOCATION: BARRETT RD DULZURA CA

EVENT: (334018)

CLAIM: (327722)

▶ NUMBER OF PHOTOS: (6)

DATE TAKEN

09/01/2022

IN POSSESSION OF: ()

1.

Taken by: MTN EMPIRE

Description of the photo: SDGE POLE WITH CROSS ARMS

Image Name: 9873093

Insert Image:



2.

Taken by: MTN EMPIER

Description of the photo: SDGE POLE

Image Name: 9873042



Insert Image:

3

Taken by: MTN EMPIRE

Description of the photo: SDGE VEHICLE EQUIPMENT

Image Name: P874628



Insert Image:

4.

Taken by: MOUNTAIN EMPIRE

Description of the photo: SDGE EQUIPMENT WITH UTILITY
POLES

Image Name:P873041

Insert Image:



5. Taken by: MOUNTAIN EMPIRE
Description of the photo: SDGE VEHICLE WITH POLES
Image Name:P873041

Insert Image:



6.

Taken by: MOUNTAIN EMPIRE

Description of the photo: SDGE VEHICLES

Image Name: P874585



Insert Image:

Attachment B



SDG&E
DIGITAL
EVIDENCE
LOG

CASE NAME: Border Fire

LOCATION: Barrett Road, Dulzura

EVENT: 8/31/2022

CLAIM: 327722

▶ TYPE OF MEDIA: Photos

DATE TAKEN: 7/23/2024

▶ NUMBER OF PHOTOS: 14

IN POSSESSION OF:

1.

Taken by: Dayna Taijeron

Description of the photo: Secondary and primary wires, guy wire and insulators

Image Name: IMG_1161

Insert Image:



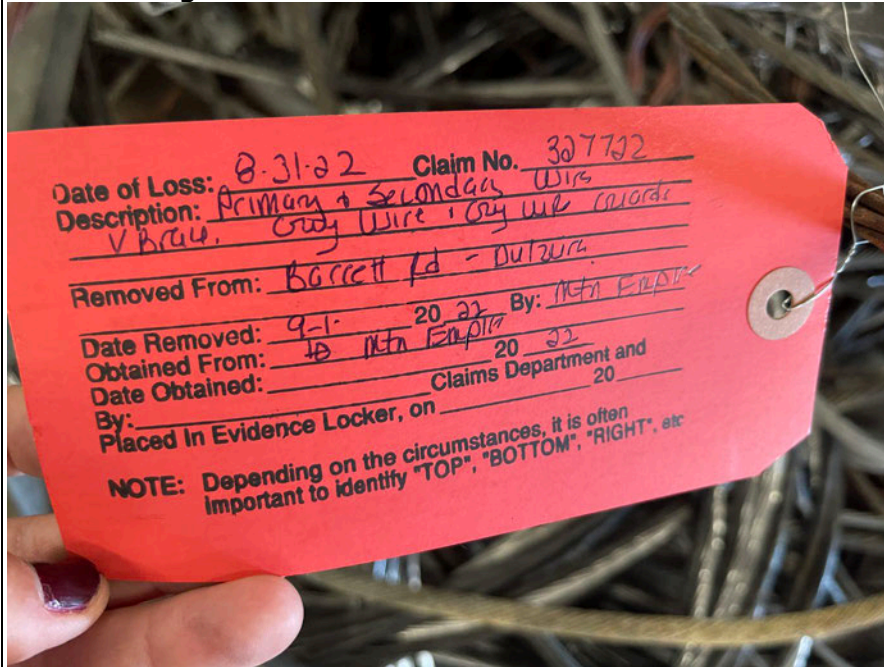
2.

Taken by: [REDACTED]

Description of the photo: Evidence tag related to IMG_1161

Image Name: IMG_1163

Insert Image:



3.

Taken by: [REDACTED]

Description of the photo: Pole pieces, one insulator and a crossarm

Image Name: IMG_1142

Insert Image:



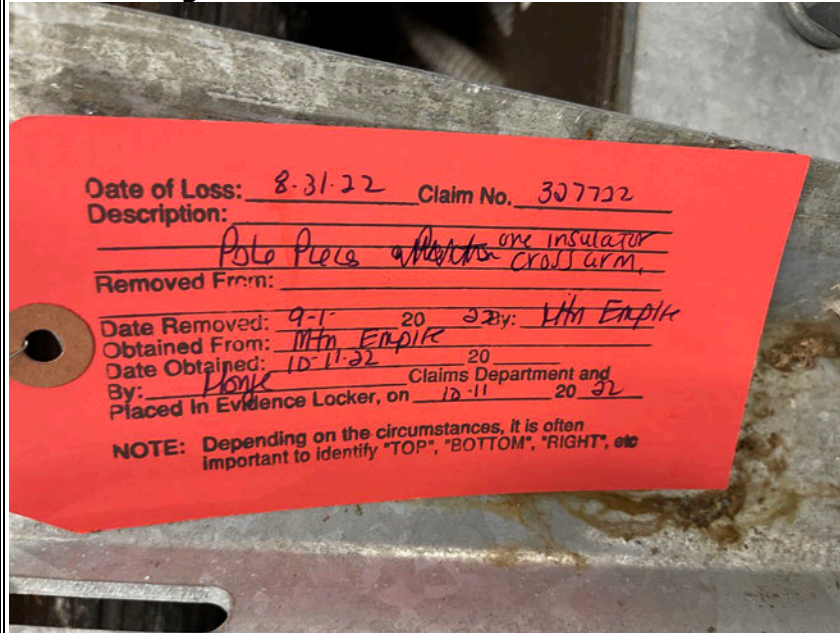
4.

Taken by: [REDACTED]

Description of the photo: Evidence tag related to IMG_1142

Image Name: IMG_1155

Insert Image:



5.

Taken by: [REDACTED]

Description of the photo: Pole pieces with crossarms and insulator in tact

Image Name: IMG_1144

Insert Image:



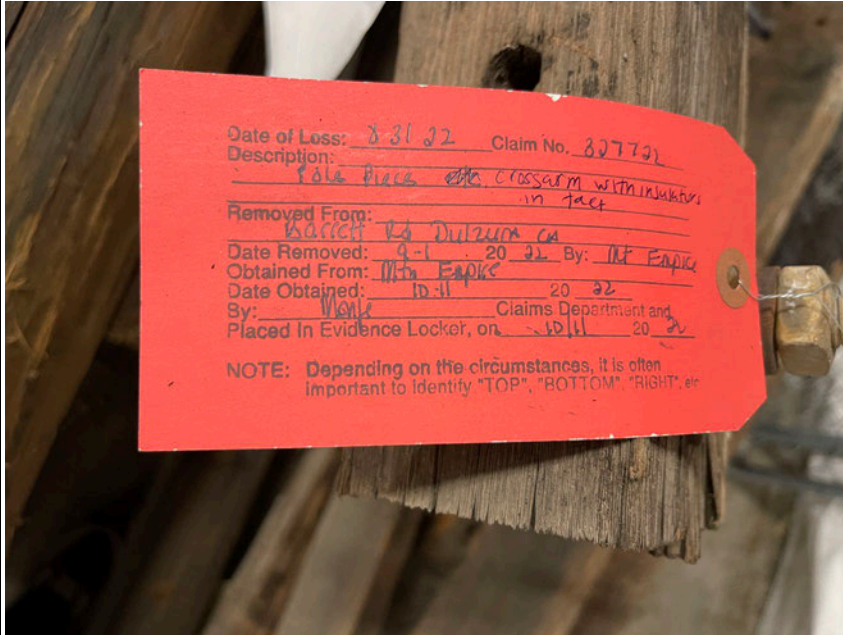
6.

Taken by: [REDACTED]

Description of the photo: Evidence tag related to IMG_1144

Image Name: IMG_1156

Insert Image:



7.

Taken by: [REDACTED]

Description of the photo: Pole parts, wire, crossarm, insulators

Image Name: IMG_1146

Insert Image:



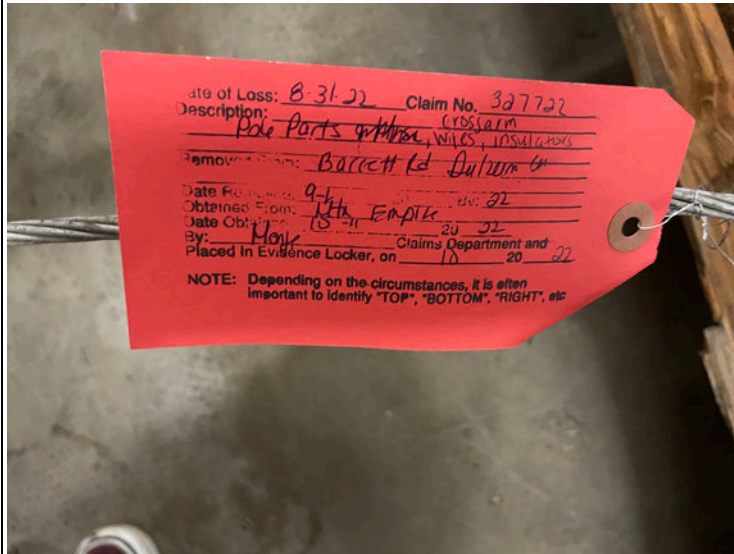
8.

Taken by: [REDACTED]

Description of the photo: Evidence tag related to IMG_1146

Image Name: IMG_1157

Insert Image:



9.

Taken by: [REDACTED]

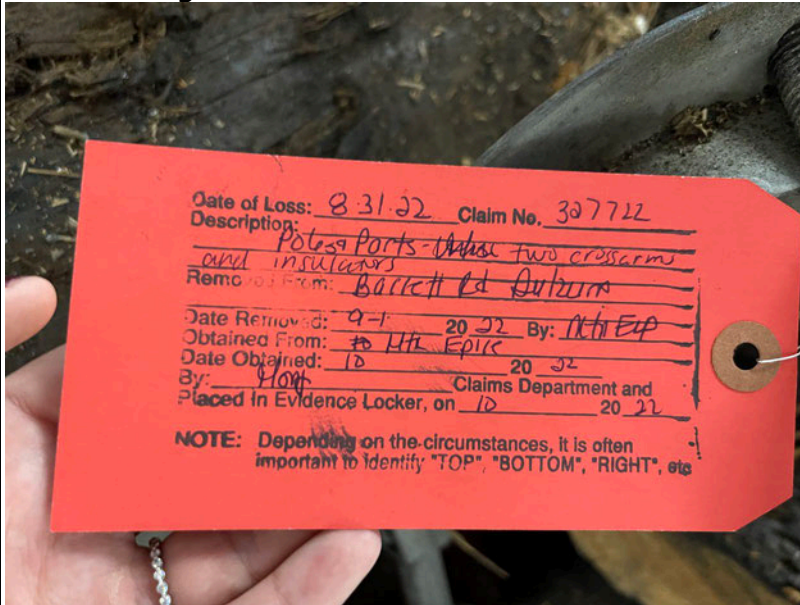
Description of the photo: Pole parts, insulator and crossarm

Image Name: IMG_1148

Insert Image:



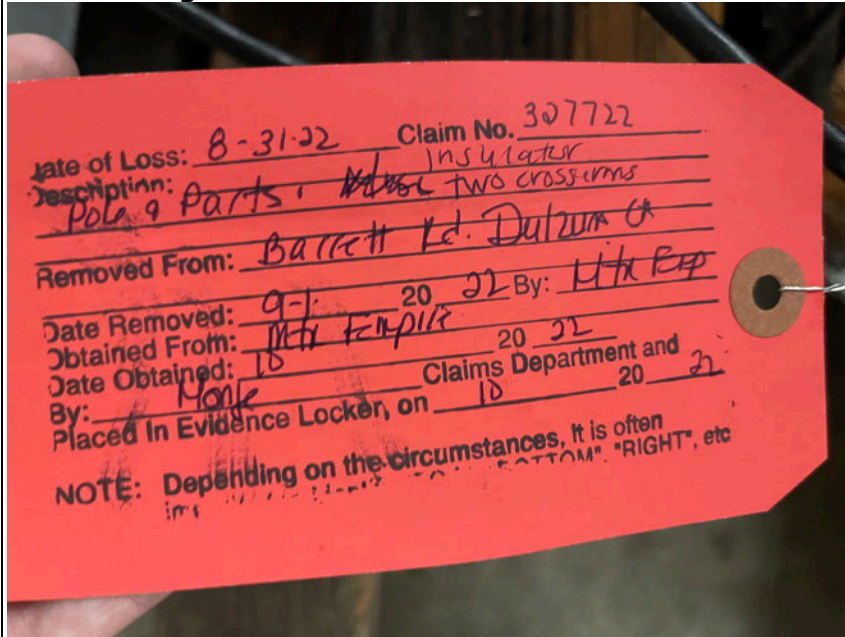
10. Taken by: [REDACTED]
Description of the photo: Evidence tag related to IMG_1148
Image Name: IMG_1159
Insert Image:



11. Taken by: [REDACTED]
Description of the photo: Pole parts, insulator and two crossarms
Image Name: IMG_1150
Insert Image:



12. Taken by: [REDACTED]
Description of the photo: Evidence tag related to IMG_1150
Image Name: IMG_1158
Insert Image:



A red evidence tag with handwritten information. The tag is oriented vertically and has a hole punched on the right side. The text on the tag is as follows:

- Date of Loss: 8-31-22
- Claim No. 307722
- Description: Insulator
- Parts: 2 cross arms
- Removed From: Barrett Rd. Duluth GA
- Date Removed: 9-7-20
- Obtained From: MTR Empire
- Date Obtained: 10-20-22
- By: MTR
- Placed In Evidence Locker, on 10-20-22
- Claims Department and

NOTE: Depending on the circumstances, it is often placed in the "TOP", "BOTTOM", "RIGHT", etc.

13. Taken by: [REDACTED]
Description of the photo: Tarp and cooler
Image Name: IMG_1164
Insert Image:

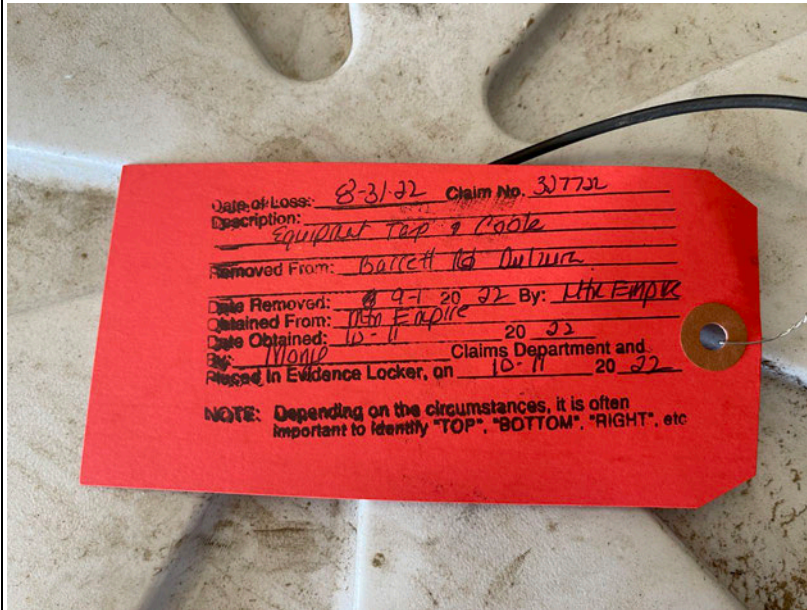


14. Taken by: [REDACTED]

Description of the photo: Evidence tag related to IMG_1164

Image Name: IMG_1165

Insert Image:



Attachment C

EVIDENCE INVENTORY FILE

INCIDENT/CASE NAME: Border Fire

CLAIM NUMBER: 307722

DATE OF LOSS: 8-31-22

ASSIGNED CLAIMS REP.: Monje

INCIDENT LOCATION: Barrett Rd Duluth

DATE SECURED: 10-11-22 FROM (WHO AND/OR
LOCATION): Mtn Empire

EVIDENCE DESCRIPTION/PURPOSE, ETC.: _____

Poles Pairs Etc

CPUC

DISPOSAL DATE (REQUIRED KEEP 5 YEARS)

YES ✓ NO

8-31-27

CHECK OUT LIST

[illegible]

EVIDENCE TRANSFER RECEIPT

Received from Mtn Empire custody of the following item(s):

Border Fire Poles & Various Electrical Parts
+ MISC. Items

Comments

SDG&E Representative (print name & title)

SDG&E Signature _____

Representative (print name & title)

Date 10-11-22

Signature _____

Attachment D

Notification	100019309533	1D	PATROL Y1 INTERVAL 02	
Notific. Status	NOCO		COMP	

Notification Header

Location

Maintenance Plan

Reference object

Functional loc.

ED.MTE.MAPS.1375

ED:STD:MAP:17325-118370

Equipment

Assembly

Subject

Work Type

SDED-PA

199

Patrol Inspection

Description

PATROL Y1 INTERVAL 02

02/04/2021 11:19:13 PST POP PO Interface Logonid (POPRD200)
P205209,CWELDY,04-FEB-21;P873037,CWELDY,04-FEB-21;P873038,CWELDY,04-FEB-21;P873039,CWELDY,04-FEB-21;P873040,CWELDY,04-FEB-21;P873041,CWELDY,04-FEB-21;P873042,CWELDY,04-FEB-21;P874585,CWELDY,04-FEB-21;P874586,CWELDY,04-FEB-21;

Start/End Dates

Required Start

02/01/2021

00:00:00

Priority

no value default

Required End

05/31/2021

00:00:00

Revision

SDGE

Responsibilities

Planner group

/

SDGE

Main WorkCtr

EDU_MTE

/

SDED

MOUNTAIN EMPIRE ELEC UG

Job Owner

2388

Job Owner

2388

Reported by

CWELDY

Notif.date

01/25/2021

01:22:45

Notification	100021253056	1D	PATROL Y1 INTERVAL 02	
Notific. Status	NOCO		COMP	

 Notification Header Location  Maintenance Plan

Reference object

Functional loc.	ED.MTE.MAPS.1440	ED:STD:MAP:17355-118380	  
Equipment			
Assembly			

Subject

Work Type	SDED-PA	199	Patrol Inspection	
Description	PATROL Y1 INTERVAL 02			

02/08/2022 08:04:19 PST POP PO Interface Logonid (POPRD200)
P205209,RMCGHEN,06-FEB-22;P873037,RMCGHEN,06-FEB-22;P873038,RMCGHEN,06-FEB-22;P873039,RMCGHEN,06-FEB-22;P873040,RMCGHEN,06-FEB-22;P873041,RMCGHEN,06-FEB-22;P873042,RMCGHEN,06-FEB-22;P874585,RMCGHEN,06-FEB-22;P874586,RMCGHEN,06-FEB-22;

Start/End Dates

Required Start	02/01/2022	00:00:00	Priority	no value default	
Required End	05/31/2022	00:00:00			
Revision		SDGE			

Responsibilities

Planner group		/	SDGE		
Main WorkCtr	EDU_MTE	/	SDED	MOUNTAIN EMPIRE ELEC UG	
Job Owner	2388				
Job Owner	2388				
Reported by	RMCGHEN		Notif.date	01/25/2022	01:16:34

Attachment E

Patrol History

Equipment	600591109	Category	1	Electric Distribution
Description	ED:POLE::P874585			
Status	INST	INST		
Valid From	10/01/2007	Valid To	12/31/9999	

General	Location	Organization	Structure	Characteristics
---------	----------	--------------	-----------	-----------------

Classification	
Joint Attachments Known	1
Joint Attachments Found	1
Type of Pole	None
Class	Class 1
Height	50
Material	Steel
Owner	SDGE
Species1	SW
Suffix1	
Treatment	WEATHERING
Wild Life Protectors Installed	N
Transmission Pole	N
Traffic Control Required	
Facility Map	17355-118380

Notification selection	
Notification	to
Notification type	to
Functional Location	to

Restrict Value Range	
T: Text (= Description)	Q: Location list (service)
Description	*17355-118380*
Language Key	EN
Functional Location	
Labeling system	1
Restrict number to	500 ☐ No restriction

Functional Location Label 1 Entry

Functional Location	Description of functional location	Language
ED.MTE.MAPS.1440	ED:STD:MAP:17355-118380	EN

☐ ☐ ☐ ☐ ☐

Notification selection

Notification		to		
Notification type	1D	to		
Functional Location	ED.MTE.MAPS.1440	to		
Equipment		to		
Material		to		
Serial Number		to		
Addit. device data		to		
Order		to		
Notification date		to		
Partners				

Cls.

Typ	Notification	Description	Sort field	Reference date
1D	100004770738	PATROL Y1	17355-118380	06/10/2013
1D	100005455992	PATROL Y1	17355-118380	03/18/2014
1D	100006693183	PATROL Y1 INTERVAL 03	17355-118380	04/21/2015
1D	100008261842	PATROL Y1 INTERVAL 02	17355-118380	03/01/2016
1D	100010008741	PATROL Y1 INTERVAL 02	17355-118380	02/03/2017
1D	100011657903	PATROL Y1 INTERVAL 02	17355-118380	02/08/2018
1D	100013648510	PATROL Y1 INTERVAL 02	17355-118380	02/19/2019
1D	100017437086	PATROL Y1 INTERVAL 02	17355-118380	02/07/2020
1D	100019309543	PATROL Y1 INTERVAL 02	17355-118380	02/04/2021
1D	100021253056	PATROL Y1 INTERVAL 02	17355-118380	02/06/2022
1D	100023267619	PATROL Y1 INTERVAL 02	17355-118380	03/03/2023
1D	100025403311	PATROL Y1 INTERVAL 02	17355-118380	02/27/2024

Patrol Current

