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November 8, 2023

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

SUBJECT: Electric Audit of SDG&E Metro District File No. EA2023-1086

Mr. Daye:

A General Order 165 Electric Distribution Audit/Inspection of SDG&E's Metro Construction and Operation District (conducted by SED Engineers Kyle King) was held from August 21, 2023, to August 25, 2023. During the field inspection your staff identified a total of seven overhead facilities with findings and five underground facilities with findings. This letter is to inform you that all items listed in your letter dated October 10, 2023, have been appropriately addressed by SDG&E.

For the record review findings, the late inspections were originally identified and reported in our totals for the 2018 General Order (GO) 165 Annual Report submitted in June of 2019. These facilities were manually assigned to an inspection plan prior to the completed automated interface project completion in 2016. At that time, the facilities were compliant with GO 165 requirements, so it was believed no further action was needed. In February 2019, various pole characteristics were updated in GIS which prompted the facilities to be reviewed through the automated interface for compliance. The automated process flagged the facilities for non-compliance with GO 165 Inspection Cycle Times and the system promptly issued inspection orders to be conducted. In reviewing the quality control measures for the automated interface, it was determined the facilities were previously overlooked due to a flaw in the reporting logic to identify potential non-compliant facilities. The reporting logic has since been addressed and all inspection orders for the facilities were completed by March 13, 2019, to ensure compliance with GO 165.

SDG&E has fully addressed the 12 facilities with findings. 11 findings were repaired the same day they were discovered during the audit. One finding has an open repair work order due to an ongoing transformer shortage issue. SDG&E valued the communication and dialogue with the engineer during the audit to understand your group's perspective on safety and compliance.

Sincerely,

Stacy Lovell-Garra

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