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

**SUBJECT: Electric Audit of SDG&E Eastern District File No. EA2024-1122**

Mr. Daye:

A General Order 165 Electric Distribution Audit/Inspection of SDG&E's Eastern Construction and Operation District (conducted by SED Engineers Kyle King) was held from February 26, 2024, to March 1, 2024. During the field inspection your staff identified a total of seven SDG&E overhead findings and one SDG&E underground finding.

The record review findings included work orders that were either completed or pending completion past SDG&E's assigned due date for corrective action. Under certain circumstances, facility and equipment repairs resulting from a maintenance inspection cannot be accomplished within the assigned due date for corrective action. SDG&E has a process in place where these occurrences are evaluated for a deferred status on an individual basis. The process ensures the work orders will be continuously monitored to completion and escalated as required based on the individual circumstances.

SDG&E has identified two discrepancies in the findings. We noted that P474432 should be P474732. Secondly, 663654H is the Communication Infrastructure Providers (CIP) pole tag, SDG&E's pole tag is P570529J. SDG&E has fully addressed the six SDG&E field findings. Five findings were repaired the same day they were discovered during the audit. One finding has an open repair work order scheduled to be repaired by December 2024. The field inspection findings include two finding related to Communication Infrastructure Providers (CIPs). We wish to clarify that the SDG&E did not fail to report CIP safety hazard(s) or create clearance violation with CIP equipment.

**SDG&E Response to CIP Violation 1**

Violation 1 concludes that during SDG&E's latest inspection, SDG&E did not document and report to the responsible third party that due to a fallen tree, a communications service drop supported on P177400 was pulled towards the ground and touching a fence.

In response, SDG&E asserts that during SDG&E's latest inspection on June 9, 2023, the CIP safety hazard wasn't present. To resolve this issue, we have included the photo from the latest inspection showing the communications service drop was not touching the fence as Attachment A.

#### SDG&E Response to CIP Violation 2

Violation 2 concludes that an SDG&E service drop on Pole number JP370364, was detached from its attachment point on a roof eave. This caused the SDG&E service drop to become entangled with a communications service drop at the roof. As a result, the clearance between the SDG&E service drop and the communications service drop was less than 12 inches within 15 feet of the point of attachment.

In response, SDG&E asserts that SDG&E's service drop attachment point hasn't changed over the years. The clearance violation was created when new communications service drop and communications dish was attached on roof. To resolve this issue, we have included Google photos from before and after of the new communications service drop and communications dish attachments as Attachment B.

SDG&E would appreciate if SED could review this response and reconsider the two CIP Violation findings. The communication companies were properly notified the same day they were discovered during the audit.

SDG&E valued the communication and dialogue with the engineers during the audit to understand your group's perspective on safety and compliance.

Sincerely,



Stacy Lovell-Garra  
Program Management Compliance Advisor

## Attachment A

P177400: June 2023 *inspection photo* showing the CIP safety hazard wasn't present.

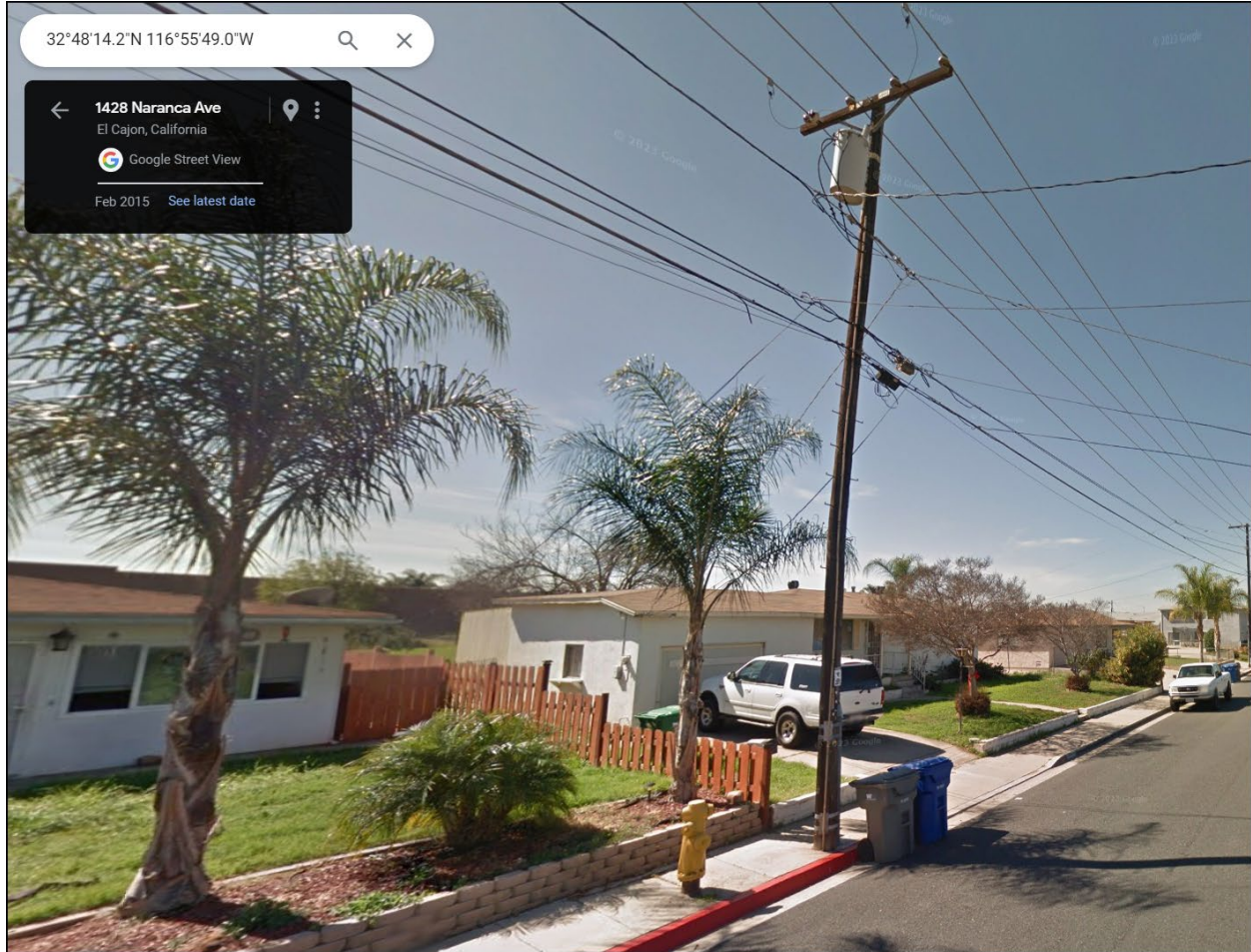


P177400: February 2024 *audit photo* showing the CIP safety hazard identified during CPUC audit.



## Attachment B

Feb 2015 Google image showing two service drops (SDG&E and CIP) with no clearance issue.



Dec 2022 Google image showing three service drops (SDG&E and two CIPs) with clearance issue. SDG&E's service drop attachment point didn't move.

