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October 4, 2024

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

SUBJECT: Electric Audit of SDG&E Orange County District File No. EA2024-1247

Mr. Daye:

A General Order 165 Electric Distribution Audit/Inspection of SDG&E's Orange County Construction and Operation District (conducted by SED Engineers Kyle King) was held from August 5-9, 2024. During the field inspection your staff identified a total of four SDG&E overhead findings and two SDG&E underground findings.

The record review findings included work orders that were either completed completion past SDG&E's assigned due date for corrective action. In accordance with General Order 95, Rule 18(B)(1)(b), 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 are continuously monitored to completion and escalated as required based on the individual circumstances.

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 June 2025.

The field inspection findings included two findings that SDG&E had previously identified during SDG&E's latest inspection and had open repair work orders to remediate. P28115J was inspected on 5/2/2024 and repair workorder 'I234 Damaged/Missing High Volt Signs-2 man' on notification 100025945667 was open. P226634 was inspected on 5/22/2023 and repair workorder 'I236 Damaged/Missing High Volt Signs-1 man' on notification 100023885157 was open and deferred due to job scope change to incorporate pole change out. Further, while SDG&E places internal due dates of 12 months on the majority of observed conditions, Damaged/Missing High Voltage Signs

are considered Level 3 corrective actions with a low potential risk to safety and reliability and are subject to a 60-month compliance timeframe Under General Order 95, Rule 18(B).

SDG&E would appreciate if SED could review this response and reconsider the two field findings previously identified during SDG&E's latest inspection that had open repair work orders to remediate.

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

Sincerely,

A handwritten signature in cursive script that reads "Stacy Lovell-Garra".

Stacy Lovell-Garra
Program Management Compliance Advisor