

July 1, 1999

California Public Utilities Commission  
Attn: Docket Clerk  
505 Van Ness Avenue, Room 2001  
San Francisco, CA 94102

Re: R. 96-11-004--Electric Distribution Standards

Dear Sir or Madame:

Pursuant to Decision No. 97-03-070, enclosed for filing are an original and five (5) copies of Pacific Gas & Electric Company's G.O. 165 Compliance Plan for 2000 and Annual Compliance Report for 1998 in the above-mentioned proceeding.

Please file-stamp a copy and place into the PG&E box for pickup by our messenger.  
Thank you.

Very truly yours,

LISE H. JORDAN

LHJ:cmp

cc: ALJ Kim Malcolm-Room 5115  
Kevin Coughlan-Room 3102  
Mark Ziering-Room 3105  
All parties in R. 96-11-004

Enclosure

CERTIFICATE OF SERVICE

I, the undersigned, state that I am a citizen of the United States and am employed in the City and County of San Francisco; that I am over the age of eighteen (18) years and not a party to the within cause; and that my business address is Pacific Gas and Electric Company, Law Department B30A, 77 Beale Street, San Francisco, California 94105.

I am readily familiar with the business practice of Pacific Gas and Electric Company for collection and processing of correspondence for mailing with the United States Postal Service. In the ordinary course of business, correspondence is deposited with the United States Postal Service the same day it is submitted for mailing.

On the 1st of July, 1999, I served a true copy of:

PACIFIC GAS & ELECTRIC COMPANY'S  
GENERAL ORDER 165 COMPLIANCE PLAN  
FOR 2000 AND ANNUAL COMPLIANCE REPORT FOR 1998  
SUBMITTED TO PURSUANT TO CPUC DECISION NO. 97-03-070

by placing it for collection and mailing, in the course of ordinary business practice, with other correspondence of Pacific Gas and Electric Company, enclosed in a sealed envelope, with postage fully prepaid, addressed to:

Please see attached service list:                      R. 96-11-004

I certify and declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on the 1st of July, 1999.

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LISE H. JORDAN

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking for Electric  
Distribution Facility Standard Setting

(U 39 E)

R. 96-11-004

**PACIFIC GAS & ELECTRIC COMPANY  
GENERAL ORDER 165 COMPLIANCE PLAN  
FOR 2000 AND ANNUAL COMPLIANCE REPORT FOR 1998  
SUBMITTED PURSUANT TO CPUC DECISION NO. 97-03-070**

Pursuant to Decision 97-03-070, enclosed is PG&E's General Order 165 Compliance Plan for 2000 and Annual Compliance Report for 1998.

Respectfully submitted,

ANDY L. NIVEN  
LISE H. JORDAN

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LISE H. JORDAN

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Attorneys for  
PACIFIC GAS AND ELECTRIC COMPANY

Dated: July 1, 1999

**PACIFIC GAS & ELECTRIC COMPANY**  
**GENERAL ORDER 165 COMPLIANCE PLAN FOR 2000**  
**AND ANNUAL COMPLIANCE REPORT FOR 1998**  
**SUBMITTED PURSUANT TO CPUC DECISION NO. 97-03-070**

July 1, 1999

**PACIFIC GAS & ELECTRIC COMPANY  
GENERAL ORDER 165 COMPLIANCE PLAN FOR 2000  
AND ANNUAL COMPLIANCE REPORT FOR 1998**

Pursuant to Section IV of the California Public Utilities Commission's (Commission) General Order (G.O.) 165, adopted in Decision No. (D.) 97-03-070, Pacific Gas & Electric Company (PG&E) submits its compliance plan for distribution facilities inspection activities in 2000. Attached as Appendix A is the Compliance Plan, which describes how PG&E intends to comply in 2000 with the requirements set forth in G.O. 165. This plan sets forth the anticipated activities PG&E will undertake to comply with G.O. 165. While events in the field may cause variations in the quarterly schedules for system patrols and inspections, the planned results by the end of the year are anticipated to meet the requirements of G.O. 165. Attached as Appendix B is the Annual Report for 1998.

As reflected in this Compliance Plan and the Annual Report, PG&E patrols and inspects padmounted facilities on the same schedule as underground facilities.

**COMPLIANCE PLAN**

**I. PATROLS FOR OVERHEAD AND UNDERGROUND FACILITIES**

Patrols will be performed in the course of company business by qualified personnel. The primary lines patrolled will be recorded on patrol maps. Progress reports will be prepared by operating areas indicating the number of overhead poles and the number of underground enclosures patrolled. Abnormal conditions will be documented on a maintenance tag and entered into a computerized maintenance system. For 2000, PG&E will be patrolling 100% of both its urban and rural electric distribution facilities.

## COMPLIANCE PLAN (Cont.)

### II. DETAILED INSPECTIONS SCHEDULED FOR 2000

#### A. OVERHEAD<sup>1</sup> FACILITIES

<i>Number of Poles by Area/Division<sup>2</sup></i>	<i>Jan. - Mar.</i>	<i>Apr. - Jun.</i>	<i>Jul. - Sep.</i>	<i>Oct. - Dec.</i>	<b>Total</b>
Central Coast	5,383	8,073	8,073	5,382	26,911
De Anza	1,516	3,090	3,090	2,060	9,756
Diablo	3,637	3,500	3,600	3,306	14,043
East Bay	6,250	6,231	0	0	12,481
Fresno	5,359	21,437	21,438	5,359	53,593
Kern	6,923	6,923	6,922	6,922	27,690
Los Padres	5,094	5,094	5,094	5,095	20,377
Mission	2,862	2,863	2,865	2,868	11,458
North Bay	3,398	5,097	5,098	3,398	16,991
North Coast	8,306	8,306	8,305	8,305	33,222
North Valley	13,309	14,189	17,180	3,159	47,837
Peninsula	3,375	3,375	3,375	3,375	13,500
Sacramento	5,473	5,473	5,473	5,473	21,892
San Francisco	0	800	2,400	1,210	4,410
San Jose	3,180	3,180	3,180	3,180	12,720
Sierra	9,437	11,152	12,957	8,638	42,184
Stockton	0	9,300	13,950	7,775	31,025
Yosemite	4,300	12,920	12,920	12,901	43,041
Total	87,802	131,003	135,920	88,406	443,131

<sup>1</sup> Overhead inspections will be performed on Transformers, Switching/Protective Devices, Regulators/Capacitors, Overhead Conductors and Cables.

<sup>2</sup> Reporting of overhead facilities will be converted from miles of line to number of poles starting in 1999.

## COMPLIANCE PLAN (Cont.)

### B. UNDERGROUND<sup>3</sup> FACILITIES

<i>Number of Enclosures by Area/Division</i>	<i>Jan. - Mar.</i>	<i>Apr. - Jun.</i>	<i>Jul. - Sep.</i>	<i>Oct. - Dec.</i>	<b>Total</b>
Central Coast	739	1,150	1,200	660	3,749
De Anza	1,084	1,093	1,093	730	4,000
Diablo	2,524	2,615	2,481	2,192	9,812
East Bay	700	2,000	1,316	0	4,016
Fresno	624	2,495	2,495	624	6,238
Kern	1,812	1,812	1,812	1,807	7,243
Los Padres	363	363	363	360	1,449
Mission	1,905	1,905	1,908	1,908	7,626
North Bay	853	1,281	1,282	853	4,269
North Coast	2,077	2,077	2,078	2,078	8,310
North Valley	415	917	795	830	2,957
Peninsula	2,220	2,220	2,220	2,220	8,880
Sacramento	1,440	1,440	1,440	1,449	5,769
San Francisco	800	1,000	1,050	762	3,612
San Jose	1,959	1,959	1,959	1,959	7,836
Sierra	300	1,830	1,830	484	4,444
Stockton	0	1,101	1,653	920	3,674
Yosemite	267	798	798	798	2,661
Total	20,082	28,056	27,773	20,634	96,545

<sup>3</sup> Underground inspections will be performed on Transformers, Switching/Protective Devices, Regulators/Capacitors, and Padmounted equipment.



## COMPLIANCE PLAN (Cont.)

### III. INTRUSIVE WOOD POLE INSPECTIONS SCHEDULED FOR 2000

Number of Poles	<i>Jan. - Mar.</i>	<i>Apr. - Jun.</i>	<i>Jul. - Sep.</i>	<i>Oct. - Dec.</i>	<b>Total<sup>4</sup></b>
System	19,500	21,560	21,620	29,554	92,234

PG&E is currently conducting a wood pole test and treat program of all poles over 10 years old.

The program began in November, 1994.

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<sup>4</sup> Total does not include poles scheduled in prior years and rescheduled into year 2000

## 1998 ANNUAL REPORT

I. PATROLS<sup>5</sup>

## A. OVERHEAD PATROLS:

	Miles of Line Scheduled for Patrol	Miles of Line not Patrolled	Reason patrol was not completed	Date patrol will be completed
Urban/ Rural	61,069	0		

## B. UNDERGROUND PATROLS:

	Number of Enclosures Scheduled for Patrol	Number of Enclosures not Patrolled	Reason patrol was not completed	Date patrol will be completed
Urban/ Rural	148,137	3,760	Patrol or inspections of these rural enclosures were completed in 1997.	Dec. 1999

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<sup>5</sup> These tables represent 100% of both the urban and rural electric distribution system where a detailed inspection was not performed.

**1998 ANNUAL REPORT (Cont.)**

**II. DETAILED INSPECTIONS**

**A. OVERHEAD<sup>6</sup> FACILITIES:**

Area/ Division	Miles of Line Scheduled for Inspection	Miles of Line not Inspected	Reason inspection was not completed	Date inspection will be completed
Central Coast	1,116	0		
De Anza	286	6	Scheduled for 1999	Jan. 1999
Diablo	424	0		
East Bay	318	0		
Fresno	2,078	0		
Kern	1,570	43	Circuit rearrangement reduced yearly schedule resulting in transfer to 1999	Sept. 1999
Los Padres	861	0		
Mission	358	0		
North Bay	524	0		
North Coast	1,917	16	Schedule was based on miles reported in DEDSA, the miles reported as a result of the actual inspection were 16 miles less.	
North Valley	1,825	0		
Peninsula	456	125	1998 schedule was an estimate and found to be in error when mileage was calculated during actual inspection performed in 1998	
Sacramento	956	0		
San Francisco	140	0		
San Jose	453	0		
Sierra	1,495	139	Circuit rearrangement reduced yearly schedule resulting in transfer to 1999	June 1999
Stockton	1,006	0		
Yosemite	2,041	8	1 mile is the result of a mileage discrepancy due to changes in DEDSA. The remaining 7 miles were due to load transfers.	June 1999
Total	17,824	337		

<sup>6</sup> Overhead inspections include inspections of Transformers, Switching/Protective Devices, Regulators/Capacitors, Overhead Conductors and Cables.

**1998 ANNUAL REPORT (Cont.)**

**B. UNDERGROUND<sup>7</sup> FACILITIES:**

Area/ Division	Number of Enclosures Scheduled for Inspection	Number of Enclosures not Inspected	Reason inspection was not completed	Date inspection will be completed
Central Coast	3,487	0		
De Anza	4,000	0		
Diablo	3,462	0		
East Bay	2,700	0		
Fresno	6,712	151	Scheduled enclosures were based on an estimate, actual count was 151 less.	
Kern	4,841	3,854	An enclosure count error was identified in 1997, the actual enclosures completed in 1997 were 7,243. The 3,854 enclosures not inspected in 1998 had been inspected in 1997	
Los Padres	1,975	0		
Mission	7,433	0		
North Bay	4,318	74	Schedule was based on an estimated number of enclosures, the 74 fewer enclosures reported was a result of the actual inspection.	
North Coast	7,239	0		
North Valley	2,018	0		
Peninsula	5,017	1,382	The circuit miles identified for inspections in 1998 were inspected. However, the 1998 schedule of number of enclosures was based on an estimate and found to be in error when the number of enclosures were physically counted during the inspections.	
Sacramento	5,577	0		
San Francisco	4,000	0		
San Jose	9,616	1,495	The circuit miles identified for inspections in 1998 were inspected. However, the 1998 schedule of number of enclosures was based on an estimate and found to be in error when the number of enclosures were physically counted during the inspections.	
Sierra	4,462	0		
Stockton	3,999	1,243	The inspection of these enclosures was rescheduled to 1999.	Dec. 1999
Yosemite	2,466	0		
<b>Total</b>	<b>83,322</b>	<b>8,199</b>		

<sup>7</sup> Underground inspections include inspections of Transformers, Switching/Protective Devices, Regulators/Capacitors, and Padmounted equipment.

**1998 ANNUAL REPORT (Cont.)**

**C. IDENTIFIED CONDITIONS<sup>8</sup> IN 1998:**

Facilities*	Estimated quantity	Corrective Action Required				No Corrective Action Required	
		Grade 1 <sup>A</sup>		Grade 2 <sup>B</sup>		Number	Percent
		Number	Percent	Number	Percent		
Transformers							
Overhead	782,843	4,186	0.5 %	4,848	0.6 %	773,809	98.8 %
Underground**	163,443	880	0.5 %	5,228	3.2 %	157,335	96.3 %
Switches/ Disconnects							
Overhead	141,996	667	0.5 %	1,612	1.1 %	139,717	98.4 %
Underground	86,417	118	0.1 %	785	0.9 %	82,461	99.0 %
Protective Devices							
Overhead	N/A	626	N/A	2,674	N/A	N/A	N/A
Underground	N/A	39	N/A	398	N/A	N/A	N/A
Voltage Regulation							
Overhead	15,216	190	1.2 %	1,257	8.3 %	13,769	90.5 %
Underground	N/A	29	N/A	33	N/A	N/A	N/A
Wire & Connectors <sup>9</sup>							
Overhead	N/A	9,317	N/A	35,316	N/A	N/A	N/A
Enclosures <sup>10</sup>							
Underground	244,000	2,885	1.2 %	13,536	5.5 %	227,579	93.3 %

\*Multiple conditions that are at one location are reported in the facility category that is the most serious condition with the earliest scheduled repair date.

\*\*Underground categories includes padmounted equipment.

<sup>A</sup> Grade 1 is defined as a condition requiring urgent and immediate response and continued action until the condition is repaired or no longer presents a potential hazard.

<sup>B</sup> Grade 2 is defined as a condition requiring timely corrective action to mitigate an existing condition which, at the time of identification, does not present an immediate hazard to third parties, company employees or property.

<sup>8</sup> Conditions listed in this section of the Report include conditions identified during patrols and inspections conducted in 1998.

<sup>9</sup> In addition to OH conductor, conditions reported in this table include Grounds, Pole Hardware, and Guying.

<sup>10</sup> In addition to Enclosures, conditions reported in this table include Grounds, Wires, and Connectors.

**1998 ANNUAL REPORT (Cont.)**

**D. CORRECTIVE ACTION SCHEDULED FOR 1998<sup>11</sup>:**

Facilities	Conditions scheduled for correction	Number of facilities		Number of facilities		Reason why correction was not completed	Date correction will be completed <sup>12</sup>
		Corrected	Percentage	Not Corrected	Percentage		
Transformers							
Overhead	3,404	3,370	99 %	34	1 %	Priority and type of corrective action required were re-evaluated.	Mar. 2001
Underground	4,135	4,083	99 %	52	1 %	Priority and type of corrective action required were re-evaluated.	June 2000
Switches/ Protective Devices (Disconnects)							
Overhead	3,284	3,257	99 %	27	1 %	Priority and type of corrective action required were re-evaluated.	June 2001
Underground	772	762	99 %	10	1 %	Priority and type of corrective action required were re-evaluated.	Mar. 2000
Regulators/ Capacitors (Voltage Regulation)							
Overhead	1,199	1,199	100 %	0	0 %		
Underground	30	30	100 %	0	0 %		
Overhead Conductors & Cables (Connectors) <sup>13</sup>							
Overhead	26,014	25,768	99 %	246	1 %	Priority and type of corrective action required were re-evaluated.	June 2001
Enclosures <sup>14</sup>							
Underground	10,740	10,696	99 %	44	1 %	Priority and type of corrective action required were re-evaluated.	Mar. 2001

<sup>11</sup> Table includes conditions that were identified in 1997 & 1998.

<sup>12</sup> Represents the latest date that any condition in the respective category is scheduled for completion. Conditions may be corrected earlier than indicated.

<sup>13</sup> In addition to OH conductor, conditions reported in this table include Grounds, Pole Hardware, and Guying.

<sup>14</sup> In addition to enclosures, conditions reported in this table include Grounds, Wires, and Connectors.

**1998 ANNUAL REPORT (Cont.)**

**E. CORRECTIVE ACTION SCHEDULED FOR 1999<sup>15</sup>:**

	Total Conditions Scheduled for 1999	Percentage of Total Conditions Found in 1998
Transformers	6,057	80 %
Switching/Protective Devices	2,729	67 %
Regulators/ Capacitors	203	17 %
Overhead Conductor and Cable, and enclosures - UG <sup>16</sup>	26,888	73 %

**F. CORRECTIVE ACTION SCHEDULED FOR 2000<sup>17</sup>:**

	Total Conditions Scheduled for 2000	Percentage of Total Conditions Found in 1998
Transformers	1,926	26 %
Switching/Protective Devices	829	20 %
Regulators/ Capacitors	64	5.2 %
Overhead Conductor and Cable, and enclosures - UG <sup>18</sup>	7,712	21 %

<sup>15</sup> Table includes conditions that were identified in 1997 & 1998

<sup>16</sup> In addition to OH conductor, conditions reported in this table include Grounds, Pole Hardware, and Guying. In addition to enclosures, conditions reported in this table include Grounds, Wires, and Connectors.

<sup>17</sup> Table includes conditions that were identified in 1997 & 1998

<sup>18</sup> In addition to OH conductor, conditions reported in this table include Grounds, Pole Hardware, and Guying. In addition to enclosures, conditions reported in this table include Grounds, Wires, and Connectors.

**1998 ANNUAL REPORT (Cont.)**

**III. INTRUSIVE INSPECTION**

**A. WOOD POLES:**

Number of Wood Poles by Area/ Division	Wood Poles Scheduled for Inspection	Wood Poles not Inspected	Reason inspection was not completed	Date inspection will be completed <sup>19</sup>
Central Coast	137,828	73,032	Schedule adjusted to match the availability and resources of qualified contractors	June 2000
De Anza	0	0		
Diablo	0	0		
East Bay	0	0		
Fresno	0	0		
Kern	0	0		
Los Padres	0	0		
Mission	0	0		
North Bay	3,372	0		
North Coast	215,848	197,458	Schedule adjusted to match the availability and resources of qualified contractors	Dec. 2001
North Valley	79,507	78,726	Schedule adjusted to match the availability and resources of qualified contractors	Dec. 2000
Peninsula	0	0		
Sacramento	36,433	0		
San Francisco	0	0		
San Jose	0	0		
Sierra	42,012	0		
Stockton	0	0		
Yosemite	0	0		
Total	515,000	349,216		

<sup>19</sup> Represents the latest date that any condition in the respective category is scheduled for completion. Conditions may be corrected earlier than indicated.



**1998 ANNUAL REPORT (Cont.)**

**B. IDENTIFIED CONDITIONS IN 1998:**

Facilities	Number of Wood Poles	Corrective Action Required <sup>20</sup>				No Corrective Action Required	
		Grade 1 <sup>A</sup>		Grade 2 <sup>B</sup>			
		Number	Percent	Number	Percent	Number	Percent
Wood Poles	2,200,000	1,549	0.07 %	30,326	1.4 %	2,168,125	98.5 %

<sup>A</sup> Grade 1 is defined as a condition requiring urgent and immediate response and continued action until the condition is repaired or no longer presents a potential hazard.

<sup>B</sup> Grade 2 is defined as a condition requiring timely corrective action to mitigate an existing condition which, at the time of identification, does not present an immediate hazard to third parties, company employees or property.

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<sup>20</sup> Wood pole corrective conditions include those from all sources of identification and not exclusively the intrusive inspections. Example: Grade 1 conditions include pole repairs due to car/pole accidents.

**1998 ANNUAL REPORT (Cont.)**

**C. CORRECTIVE ACTION SCHEDULED FOR 1998<sup>21</sup>:**

Facilities	Poles scheduled for correction	Number of Wood Poles		Number of Wood Poles		Date correction will be completed
		Corrected	Percentage	Not corrected	Percentage	
Wood Poles	10,646	9,964	93.6 %	682	6.4 %	June 2001

Reason why correction was not completed:

Scheduled for replacement or reinforcement with other poles as part of an ongoing pole replacement / reinforcement program. Repair priority and type of corrective action required were re-evaluated.

**D. CORRECTIVE ACTION SCHEDULED FOR 1999<sup>22</sup>:**

Facilities	Number of Poles Scheduled for Corrective Action in 1999	Percentage of Poles Identified in 1998 Needing Corrective Action
Wood Poles	25,247	79 %

**E. CORRECTIVE ACTION SCHEDULED FOR 2000<sup>23</sup>:**

Facilities	Number of Poles Scheduled for Corrective Action in 2000	Percentage of Poles Identified in 1998 Needing Corrective Action
Wood Poles	9,460	30 %

<sup>21</sup> Table includes conditions that were identified in 1997 & 1998.

<sup>22</sup> Table includes conditions that were identified in 1997 & 1998.

<sup>23</sup> Table includes conditions that were identified in 1997 & 1998.

2000 COMPLIANCE PLAN - APPENDIX A

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1998 ANNUAL REPORT - APPENDIX B

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