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Robert R. Rickett
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July 3, 2000

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 2001 and Annual Compliance Report for 1999 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,

Robert R Rickett/vlr

ROBERT R. RICKETT
RRR:vlr

cc: Kevin Coughlan-Room 4002
Mark Ziering-Room 4011

Enclosure

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking for Electric Distribution Facility Standard Setting. (U 39 E)	Rulemaking 96-11-004 (filed November 6, 1996)

PACIFIC GAS AND ELECTRIC COMPANY GENERAL ORDER 165 COMPLIANCE PLAN FOR 2001 AND ANNUAL COMPLIANCE REPORT FOR 1999 SUBMITTED PURSUJANT TO CPUC DECISION 97-03-070

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July 1, 2000

PACIFIC GAS & ELECTRIC COMPANY

GENERAL ORDER 165 COMPLIANCE PLAN FOR 2001

AND ANNUAL COMPLIANCE REPORT FOR 1999

SUBMITTED PURSUANT TO CPUC DECISION NO. 97-03-070

July 1, 2000

TABLE OF CONTENTS

PACIFIC GAS & ELECTRIC COMPANY
GENERAL ORDER 165 COMPLIANCE PLAN FOR 2001
AND ANNUAL COMPLIANCE REPORT FOR 1999

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 2001. Attached as Appendix A is the Compliance Plan, which describes how PG&E intends to comply in 2001 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.

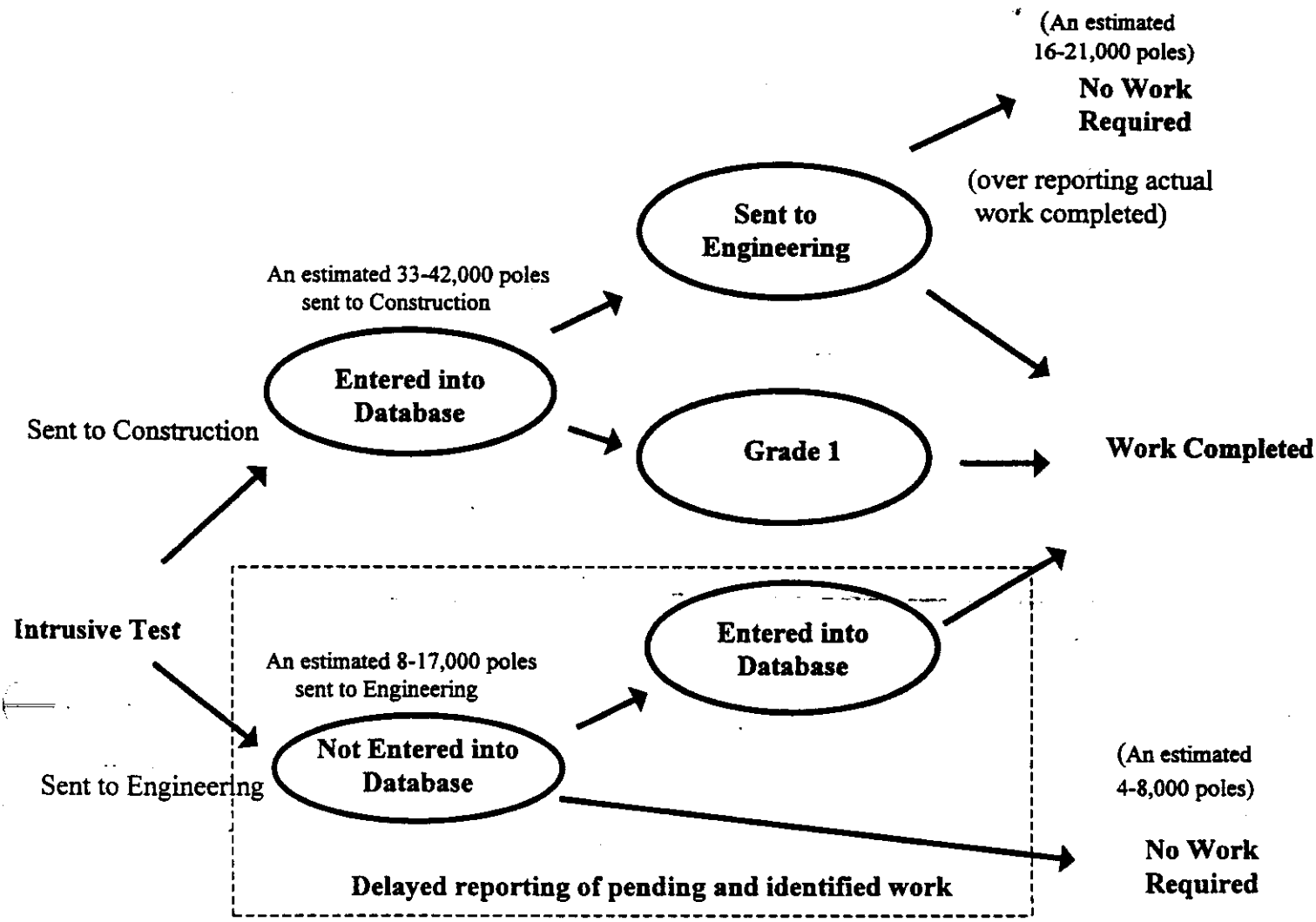
Attached as Appendix B is the Annual Report for 1999. In 1999, PG&E identified an inconsistency in the process for the recording of suspected deteriorated poles. As a result of this inconsistency in the established procedure, not all poles suspected of being deteriorated were included in the Annual Report in which the poles were reported as tested.

The inconsistency developed because PG&E identifies poles as needing corrective work by two methods. One method is through the visual inspection or patrol performed by crews located at the various division headquarters. These inspections result in the immediate issuance of a tag for poles identified as needing corrective action. The second method is by crews who are centrally managed and are performing the intrusive pole tests for the system as a whole. These inspections do not result in the immediate issuance of a tag for corrective action. Rather, if the inspection identifies a pole as suspected of needing corrective action, PG&E subsequently performs an engineering analysis to determine if the suspect pole actually needs corrective action

and issues a tag for the pole if the analysis determines that the pole needs corrective action. Because of the time between the initial inspection and the completion of the analysis, it is possible, where the inspection occurs late in the reporting year, for a pole to be identified as suspect in one reporting year, but not have the tag issued until the next.

In order to provide consistent and conservative reporting of poles needing corrective action, PG&E elected to have poles identified as suspect reported as poles requiring corrective action. PG&E therefore established a process whereby poles identified as suspect would be sent to the division and immediately entered into the tracking database. PG&E has subsequently learned, however, that only some of the divisions entered the information immediately into the database. The other divisions sent the information to the engineering department, as is indicated in the flow chart below.

Work Flow for Poles Identified prior to 2000



This created two inconsistencies in the reported data. First, some divisions reported all suspect poles as requiring corrective action, while other divisions reported only those poles subsequently found to need corrective action as poles requiring corrective action. Second, tags for corrective action on suspect poles may not have been reported as identified or pending in the Annual Report for the year in which they were identified as suspect, but in the subsequent year, instead. Since, on average, only about 50% of suspect poles are determined to need corrective action, PG&E believes that the reports filed for 1997, 1998 and 1999 still overstate the actual

number of poles requiring corrective action, which is consistent with PG&E's desire to report conservatively.

PG&E also identified one area where PG&E had failed to report corrective action identified and completed. Where an intrusive inspection identifies a pole as needing corrective action in the form of pole stubbing, the work was sent to a contract crew for completion. The annual reports do not reflect either the fact that the pole needed corrective action or that the action was completed. PG&E estimates that approximately 7,200 poles were stubbed in 1999 without being reported in the Annual Report as identified or completed. PG&E estimates that the number of poles that were not reported in prior years was less than those in 1999.

PG&E has taken the necessary steps to assure that these inconsistencies will not recur in subsequent annual reports.

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

APPENDIX A

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. Substantial abnormal conditions will be documented on a maintenance tag and entered into a computerized maintenance system. For 2001, PG&E will be patrolling 100% of its urban electric distribution facilities.

COMPLIANCE PLAN (Cont.)

II. DETAILED INSPECTIONS SCHEDULED FOR 2001

A. OVERHEAD[1] FACILITIES

Number of Poles by Area/Division[2]		*Jan. - Mar.*	*Apr. - Jun.*	*Jul. - Sep.*	*Oct. - Dec.*	**Total**
Central Coast		7,681	7,681	7,681	7,682	30,725
De Anza		1,300	3,700	3,400	1,360	9,760
Diablo		3,500	3,500	3,500	1,942	12,442
East Bay		4,891	7,378	0	0	12,269
Fresno		11,482	17,222	17,222	11,482	57,408
Kern		7,217	7,217	7,217	7,217	28,868
Los Padres		5,130	5,130	5,130	5,137	20,527
Mission		2,949	2,949	2,949	2,951	11,798
North Bay		3,858	3,859	3,859	3,858	15,434
North Coast		8,652	8,654	8,655	8,654	34,615
North Valley		12,357	12,356	12,356	12,356	49,425
Peninsula		4,496	6,744	2,258	0	13,498
Sacramento		6,213	6,213	6,213	6,213	24,852
San Francisco		0	5,500	2,200	0	7,700
San Jose		3,333	3,333	3,333	2,222	12,221
Sierra		10,915	10,915	10,915	10,916	43,661
Stockton		7,000	7,006	7,219	10,238	31,463
Yosemite		4,740	9,483	16,596	16,595	47,414
Total		105,714	128,840	120,703	108,823	464,080

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

2 Reporting of overhead facilities was converted from miles of line to number of poles starting in 1999.

COMPLIANCE PLAN (Cont.)

B. UNDERGROUND[3] FACILITIES

Number of Enclosures by Area/Division		*Jan. - Mar.*	*Apr. - Jun.*	*Jul. - Sep.*	*Oct. - Dec.*	**Total**
Central Coast		999	999	999	1,000	3,997
De Anza		450	1,300	1,500	750	4,000
Diablo		2,500	2,500	2,500	1,009	8,509
East Bay		0	2,180	2,275	0	4,455
Fresno		1,433	2,150	2,150	1,433	7,166
Kern		1,097	1,098	1,098	1,097	4,390
Los Padres		453	453	453	453	1,812
Mission		2,230	2,230	2,230	2,232	8,922
North Bay		987	990	990	988	3,955
North Coast		1,764	1,764	1,764	1,764	7,056
North Valley		783	783	782	782	3,130
Peninsula		1,113	1,113	1,110	1,104	4,440
Sacramento		1,284	1,284	1,284	1,284	5,136
San Francisco		800	1,900	1,900	700	5,300
San Jose		2,235	2,235	2,235	1,487	8,192
Sierra		1,569	1,569	1,569	523	5,230
Stockton		1,000	1,000	1,130	1,590	4,720
Yosemite		0	548	1,095	1,095	2,738
Total		20,697	26,096	27,064	19,291	93,148

3 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 2001[4]

Number of Poles	*Jan. - Mar.*	*Apr. - Jun.*	*Jul. - Sep.*	*Oct. - Dec.*	***Total***
System	9,920	9,920	9,920	9,919	39,679

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.

[4] Total does not include poles scheduled in prior years and rescheduled into year 2001

1999 ANNUAL REPORT

I. PATROLS[5]

A. OVERHEAD PATROLS:

	Number of Poles Scheduled for Patrol	Number of Poles not Patrolled	Reason patrol was not completed	Date patrol will be completed
Urban/ Rural	635,150	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	145,894	0		

[5] The compliance plan submitted for 1999 stated that a patrol of 100% of both the urban and rural electric distribution system, where a detailed inspection was not performed, would be completed. The table above represents 100% patrol completion of the urban electric distribution system, where a detailed inspection was not performed. Although different from the submitted 1999 compliance plan, the work completed is in accordance to the requirements of GO 165.

II. DETAILED INSPECTIONS

A. OVERHEAD[6] FACILITIES:

Area/ Division	Number of Poles Scheduled for Inspection	Number of Poles not Inspected	Reason inspection was not completed	Date inspection will be completed
Central Coast	28,729	0		
De Anza	9,760	0		
Diablo	13,077	0		
East Bay	12,481	0		
Fresno	52,681	0		
Kern	27,690	0		
Los Padres	24,342	0		
Mission	9,550	0		
North Bay	15,454	0		
North Coast	39,757	0		
North Valley	38,810	0		
Peninsula	13,497	0		
Sacramento	24,854	0		
San Francisco	4,410	0		
San Jose	12,846	0		
Sierra	42,184	0		
Stockton	31,025	0		
Yosemite	43,041	0		
Total	444,188	0		

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

B. UNDERGROUND[7] FACILITIES:

Area/ Division	Number of Enclosures Scheduled for Inspection	Difference between the Schedule and Actual Inspected	Reason inspection was not completed	Date inspection will be completed
Central Coast	3,724	0		
De Anza	3,632	0		
Diablo	3,698	0		
East Bay	2,628	0		
Fresno	6,158	655	The number of enclosures scheduled for 1999 were based on a calculation of enclosures per mile. Actuals were completed as counted during the inspection. All required enclosures were inspected in 1999.	
Kern	4,389	0		
Los Padres	2,631	561	The number of enclosures scheduled were based on a calculation of enclosures per mile. The actuals were completed utilizing actual counts per plot map.	
Mission	7,796	170	The scheduled inspections for 1999 were based on an estimate, the actual number completed was170 less than the estimate	
North Bay	4,456	491	The correct number of enclosures for 1999 should have been reported as 3965 originally, not 4456 which was 491 too many enclosures.	
North Coast	7,364	27	These 27 enclosures were double counted during the creation of the 1999 schedule. The schedule of 7,364 should have been 7,337 enclosures.	
North Valley	2,036	0		
Peninsula	1,517	0		
Sacramento	3,444	0		
San Francisco	4,000	0		
San Jose	8,144	0		
Sierra	3,452	0		
Stockton	7,000	311	7000 was an estimate. Actual inspections validated a total which was 311 less than the estimate.	
Yosemite	2,600	0		
Total	78,669	2,215		

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

C. IDENTIFIED CONDITIONS[8] IN 1999:

Facilities*	Estimated[9] quantity	Corrective Action Required				No Corrective Action Required	
		Grade 1 [A]		Grade 2[B]			
		Number	Percent	Number	Percent	Number	Percent
Transformers							
Overhead	784,957	3,327	0.4	3,782	0.5	777,848	99.1
Underground**	166,330	710	0.4	4,285	2.6	161,335	97.0
Switches/ Disconnects							
Overhead	144,671	572	0.4	1,521	1.1	142,578	98.5
Underground	91,165	74	0.1	554	0.6	90,537	99.3
Protective Devices							
Overhead	N/A	990	N/A	3,434	N/A	N/A	N/A
Underground	N/A	40	N/A	313	N/A	N/A	N/A
Voltage Regulation[10]							
Overhead	13,522	222	1.7	1,383	10.2	11,917	88.1
Underground	N/A	13	N/A	54	N/A	N/A	N/A
Wire & Connectors[11]							
Overhead	N/A	8,281	N/A	35,015	N/A	N/A	N/A
Enclosures[12]							
Underground	244,000	2,234	0.9	11,578	4.7	230,188	94.4

*Multiple conditions at one location are reported in the facility category that is prioritized as the most serious among a ranking of system conditions. The scheduled repair date is the earliest determined for all the conditions identified at the location.

**Underground categories includes padmounted equipment.

A 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.

B 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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8 Conditions listed in this section of the Report include conditions identified during patrols and inspections conducted in 1999.

9 These values represent the total estimated number of facilities, in each category, for the electric distribution system. The category labeled Switches/Disconnects includes fuses. The Voltage Regulation category includes boosters, capacitors, regulators and stepdown transformers.

10 PG&E's database does not distinguish between overhead and underground voltage regulation facilities. The total number of facilities listed as overhead reflects both overhead and underground

11 In addition to OH conductor, conditions reported in this table include Grounds, Pole Hardware, and Guying.

12 In addition to Enclosures, conditions reported in this table include Grounds, Wires, and Connectors.

D. CORRECTIVE ACTION SCHEDULED FOR 1999[13]:

Facilities	Conditions scheduled for correction	Number of facilities		Number of facilities		Reason why correction was not completed	Date correction will be completed [14]
		Corrected	Percentage	Not Corrected	Percentage		
Transformers							
Overhead	3,756	3,756	100 %	0	0 %		
Underground	3,864	3,864	100 %	0	0 %		
Switches/ Protective Devices (Disconnects)							
Overhead	3,650	3,650	100 %	0	0 %		
Underground	1,017	1,017	100 %	0	0 %		
Regulators/ Capacitors (Voltage Regulation)							
Overhead	1,312	1,312	100 %	0	0 %		
Underground	41	41	100 %	0	0 %		
Overhead Conductors & Cables (Connectors) [15]							
Overhead	32,292	32,292	100%	0	0 %		
Enclosures[16]							
Underground	9,426	9,426	100 %	0	0 %		

13 Table includes conditions that were identified in 1998 & 1999.

14 Represents the latest date that any condition in the respective category is scheduled for completion. Conditions may be corrected earlier than indicated.

15 In addition to OH conductor, conditions reported in this table include Grounds, Pole Hardware, and Guying.

16 In addition to enclosures, conditions reported in this table include Grounds, Wires, and Connectors.

E. CORRECTIVE ACTION SCHEDULED FOR 2000[17]:

	Total Conditions Scheduled for 2000	Percentage of Grade 2 Conditions Identified in 1999
Transformers	3,322	41%
Switching/Protective Devices	1,424	24%
Regulators/ Capacitors	125	9%
Overhead Conductor and Cable, and enclosures - UG[18]	17,903	38%

F. CORRECTIVE ACTION SCHEDULED FOR 2001[19]:

	Total Conditions Scheduled for 2000	Percentage of Grade 2 Conditions Identified in 1999
Transformers	1,714	21%
Switching/Protective Devices	1,857	32%
Regulators/ Capacitors	80	6%
Overhead Conductor and Cable, and enclosures - UG[20]	11,101	24%

17 Table includes conditions that were identified in 1998 & 1999

18 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.

19 Table includes conditions that were identified in 1998 & 1999

20 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.

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[21]
Central Coast	0	0		
De Anza	0	0		
Diablo	0	0		
East Bay	0	0		
Fresno	201,138	201,138	Schedule adjusted to match the availability and resources of qualified contractors	Dec. 2004
Kern	27,265	0		
Los Padres	0	0		
Mission	0	0		
North Bay	0	0		
North Coast	0	0		
North Valley	134,310	100,752	Schedule adjusted to match the availability and resources of qualified contractors	June 2001
Peninsula	0	0		
Sacramento	0	0		
San Francisco	0	0		
San Jose	0	0		
Sierra	20,395	0		
Stockton	66,892	66,892	Schedule adjusted to match the availability and resources of qualified contractors	Dec. 2004
Yosemite	0	0		
Total	450,000	368,782		

[21] Represents the latest date that any condition in the respective category is scheduled for completion. Conditions may be corrected earlier than indicated.

B. IDENTIFIED CONDITIONS IN 1999:

Facilities	Number of Wood Poles[24]	Corrective Action Required[22]				No Corrective Action Required	
		[A] Grade 1		[B] Grade 2[23]			
		Number	Percent	Number	Percent	Number	Percent
Wood Poles	2,229,422	1,182	0.1	29,421	1.3	2,198,819	98.6

[A] 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.

[B] 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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22 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.

23 Includes poles that may subsequently be determined, after an engineering evaluation, as not needing corrective action.

24 This value represents the total estimated number of wood poles in the electric distribution system.

C. CORRECTIVE ACTION SCHEDULED FOR 1999[25]:

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	15,103	15,096	99.9%	7	.1%	12/31/2002

Reason why correction was not completed:

The poles were re-evaluated and it was determined that repairs could be scheduled for a later date.

D. CORRECTIVE ACTION SCHEDULED FOR 2000[26]:

Facilities	Number of Poles Scheduled for Corrective Action in 2000	Percentage of Grade 2 Poles Identified in 1999
Wood Poles	3,660	12.4%

E. CORRECTIVE ACTION SCHEDULED FOR 2001[27]:

Facilities	Number of Poles Scheduled for Corrective Action in 2001	Percentage of Grade 2 Poles Identified in 1999
Wood Poles	3,025	10.3%

25 Table includes conditions that were identified in 1998 & 1999.

26 Table includes conditions that were identified in 1998 & 1999.

27 Table includes conditions that were identified in 1998 & 1999.

F. CORRECTIVE ACTION SCHEDULED FOR 2002[28]:

Facilities	Number of Poles Scheduled for Corrective Action in 2002	Percentage of Grade 2 Poles Identified in 1999
Wood Poles	53	0.2%

G. CORRECTIVE ACTION SCHEDULED FOR 2003[29]:

Facilities	Number of Poles Scheduled for Corrective Action in 2003	Percentage of Grade 2 Poles Identified in 1999
Wood Poles	1,455	4.9%

H. CORRECTIVE ACTION SCHEDULED FOR 2004[30]:

Facilities	Number of Poles Scheduled for Corrective Action in 2004	Percentage of Grade 2 Poles Identified in 1999
Wood Poles	1,326	4.5%

I. CORRECTIVE ACTION SCHEDULED FOR 2005[31]:

Facilities	Number of Poles Scheduled for Corrective Action in 2005	Percentage of Grade 2 Poles Identified in 1999
Wood Poles	18,382	62.5%

28 Table includes conditions that were identified in 1998 & 1999.

29 Table includes conditions that were identified in 1998 & 1999.

30 Table includes conditions that were identified in 1998 & 1999.

31 Table includes conditions that were identified in 1998 & 1999.