PACIFIC GAS & ELECTRIC COMPANY GENERAL ORDER 165 COMPLIANCE PLAN FOR 2002 AND ANNUAL COMPLIANCE REPORT FOR 2000 SUBMITTED PURSUANT TO CPUC DECISION NO. 97-03-070

PACIFIC GAS & ELECTRIC COMPANY GENERAL ORDER 165 COMPLIANCE PLAN FOR 2002 AND ANNUAL COMPLIANCE REPORT FOR 2000

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 2002. Attached as Appendix A is the Compliance Plan, which describes how PG&E intends to comply in 2002 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 2000.

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. Significant abnormal conditions will be documented on a maintenance tag and entered into a computerized maintenance system. Maintenance tags will be scheduled for correction in accordance with PG&E's Electric Preventive Maintenance Plan. For 2002, PG&E will be patrolling 100% of its electric distribution facilities.

COMPLIANCE PLAN (Cont.)

II. DETAILED INSPECTIONS SCHEDULED FOR 2002

A. **OVERHEAD**¹ FACILITIES

Number of Poles by Area/Division ²	Jan Mar.	Apr Jun.	Jul Sep.	Oct Dec.	Total
Central Coast	3,032	9,096	9,100	0	21,228
De Anza	2,430	2,430	2,433	2,433	9,726
Diablo	3,419	3,417	3,417	3,417	13,670
East Bay	0	12,072	0	0	12,072
Fresno	10,794	16,194	16,194	10,795	53,977
Kern	6,312	6,312	6,312	6,321	25,257
Los Padres	5,100	5,100	5,100	5,108	20,408
Mission	2,779	2,779	2,779	2,781	11,118
North Bay	4,152	4,152	4,152	4,152	16,608
North Coast	12,822	12,822	12,822	4,274	42,740
North Valley	13,995	13,995	13,995	13,995	55,980
Peninsula	4,221	4,221	4,221	4,220	16,883
Sacramento	5,351	5,351	5,351	5,354	21,407
San Francisco	0	800	2,400	1,210	4,410
San Jose	3,397	3,397	3,397	1,131	11,322
Sierra	1,500	17,796	17,796	5,933	43,025
Stockton	7,500	12,600	6,000	5,500	31,600
Yosemite	5,289	10,578	18,511	18,512	52,890
Total	92,093	143,112	133,980	95,136	464,321

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

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

COMPLIANCE PLAN (Cont.)

B. UNDERGROUND³ FACILITIES

Number of Enclosures by Area/Division	Jan Mar.	Apr Jun.	Jul Sep.	Oct Dec.	Total
Central Coast	525	1,575	1,580	0	3,680
De Anza	1,038	1,038	1,038	1,037	4,151
Diablo	2,400	2,400	2,400	1,193	8,393
East Bay	0	1,341	1,341	450	3,132
Fresno	1,314	1,971	1,971	1,317	6,573
Kern	1,227	1,227	1,227	1,228	4,909
Los Padres	342	342	342	348	1374
Mission	2,742	2,742	2,742	2,742	10,968
North Bay	991	991	992	991	3965
North Coast	2,160	2,160	2,160	720	7,200
North Valley	1,060	1,060	1,055	0	3,175
Peninsula	1,137	1,137	1,137	1,138	4,549
Sacramento	1,282	1,282	1,282	1,282	5,128
San Francisco	900	1,250	1,200	840	4,190
San Jose	2,391	2,391	2,391	797	7,970
Sierra	300	1,461	1,461	487	3,709
Stockton	800	1,250	950	1,150	4,150
Yosemite	0	772	900	901	2573
Total	20,609	26,390	26,169	16,621	89,789

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 2002⁴

Number of Poles	Jan Mar.	Apr Jun.	Jul Sep.	Oct Dec.	Total
System	15,550	15,550	16,650	39,465	87,215

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.

Total does not include poles scheduled in prior years and rescheduled into year 2002. PG&E plans to test and treat a total of approximately 242,000 poles in 2002. For a complete summary of PG&E's 10-year Pole Test and Treat program and progress reports, see PG&E's compliance filings submitted pursuant to Ordering Paragraph 21 of Decision No. 99-06-080 to the Energy Division.

2000 ANNUAL REPORT

IV. PATROLS

A. OVERHEAD PATROLS:

	Number of Poles Scheduled for	Number of Poles not Patrolled	Reason patrol was not completed	Date patrol will be completed
Urban/	Patrol 1,734,647	27,888	The poles indicated as not being patrolled are a	No date
Rural	, ,	,	result of the following abnormalities in	necessary
			reporting. 1) Poles scheduled for patrols were	since
			inspected instead. 2) Poles scheduled for rural	requirement
			patrols in 2000 were completed in 1999. 3)	was met
			The scheduled patrols in 2000 were based on	
			estimates, the actual number completed was	
			less than the estimate.	

B. UNDERGROUND PATROLS:

	Number of Enclosures Scheduled	Number of Enclosures not	Reason patrol was not completed	Date patrol will be completed
	for Patrol	Patrolled		
Urban/	169,043	2,886	Due to local personnel changes, approximately	No later than
Rural			2,886 enclosures were not patrolled in 2000	8/31/01 for
			because of a misinterpretation of patrol	the
			requirements in G.O. 165. Additional training	2000/2001
			of local personnel on G.O. 165 requirements	period
			will be completed in 2001	

V. DETAILED INSPECTIONS

A. OVERHEAD⁵ 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	26,911	0		
De Anza	9,756	0		
Diablo	14,043	1,587	The scheduled inspection numbers were based on estimates. The actual number completed was 12,456.	No date necessary since requirement was met
East Bay	12,481	0		met
Fresno	53,593	0		
Kern	27,690	2,455	The scheduled inspection numbers were based on an estimate. The actual number count was less than the estimate.	No date necessary since requirement was met
Los Padres	20,377	0		
Mission	11,458	0		
North Bay	16,991	4,086	The scheduled number of poles in a coastal area was based on an estimate, the actual number completed was less than the estimate.	No date necessary since requirement was met
North Coast	33,222	0		
North Valley	47,837	0		
Peninsula	13,500	4,521	Peninsula Division inadvertently over-scheduled poles for inspection for the year 2000. The 4,521 poles will be inspected by December 2001.	No date necessary since requirement was met
Sacramento	21,892	0		
San Francisco	4,410	0		
San Jose	12,720	20	The scheduled inspections for 2000 were based on an estimate, the actual number completed was 20 less than the estimate	No date necessary since requirement was met
Sierra	42,184	0		
Stockton	31,025	0		
Yosemite	43,041	0		
Total	443,131	12,669		1

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

B. UNDERGROUND⁶ 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	3,749	0		•
De Anza	4,000	0		
Diablo	9,812	0		
East Bay	4,016	0		
Fresno	6,238	0		
Kern	7,243	4,270	The scheduled inspection numbers were based on an estimate. The actual number count was less than the estimate.	No date necessary since requirement was met
Los Padres	1,449	0		was met
Mission	7,626	0		
North Bay	4,269	0		
North Coast	8,310	749	The original goal of 8310 was based on an estimated number of enclosures, the actual number completed was less than the estimate.	No date necessary since requirement was met
North Valley	2,957	0	•	was met
Peninsula	8,880	2,982	The scheduled inspection numbers were based on an estimate. The actual number count was less than the estimate.	No date necessary since requirement was met
Sacramento	5,769	0		
San Francisco	3,612	1,182	The scheduled inspection numbers were based on an estimate. The actual number count was less than the estimate.	No date necessary since requirement was met
San Jose	7,836	0		
Sierra	4,444	640	The scheduled 2000 Underground Inspection units were based on an estimate. The actual count of those units was less by 640.	No date necessary since requirement was met
Stockton	3,674	0		
Yosemite	2,661	0		
Total	96,54596,545	9,823		

⁶ Underground inspections include inspections of Transformers, Switching/Protective Devices, Regulators/Capacitors, and Padmounted equipment.

C. IDENTIFIED CONDITIONS⁷ IN 2000:

	Estimated ⁸	Corrective Action Required			No Cor	No Corrective	
Facilities*	quantity	Grade	e 1 ^A	Grad	le 2 ^B	Action R	Required
		Number	Percent	Number	Percent	Number	Percent
Transformers							
Overhead	784,957	2,830	0.4	2,850	0.4	779,277	99.2
Underground**	166,330	600	0.4	2,159	1.3	163,571	98.3
Switches/ Disconnects							
Overhead	144,671	920	0.6	2,348	1.6	141,403	97.8
Underground	91,165	73	0.1	354	0.4	90,738	99.5
Protective Devices ⁹							
Overhead	4,086	113	2.8	824	20.2	3,149	77.0
Underground	627	3	0.5	27	4.3	597	95.2
Voltage Regulation ¹⁰							
Overhead	13,522	152	1.1	1,202	8.9	12,168	90.0
Underground	N/A	1	N/A	7	N/A	N/A	N/A
Conductors & Cables							
Overhead ¹¹	N/A	6,665	N/A	18,325	N/A	N/A	N/A
Underground ¹²	N/A	1,600	N/A	2,663	N/A	N/A	N/A

^{*}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.

Conditions listed in this section of the Report include conditions identified during patrols and inspections conducted only in 2000.

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

PG&E's database does not distinguish between overhead and underground reclosures. The total number of facilities listed as overhead reflects both overhead and underground. Values reported for "Corrective Action Required" include conditions identified for the physical protection of padmounted equipment.

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.

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

¹² In addition to UG cable, conditions reported in this table include Grounds, Hardware, and Connectors.

D. CORRECTIVE ACTION SCHEDULED FOR 2000¹³:

Facilities	Conditions Number of scheduled facilities		Number of facilities		Reason why correction was not	Date correction	
	for correction	Corrected	Percentage	Not Corrected	Percentage	completed	will be completed
Transformers							
Overhead	2,026	2,026	100 %	0	0 %		
Underground	649	649	100 %	0	0 %		
Switches/ Protective Devices (Disconnects)							
Overhead	2,713	2,713	100 %	0	0 %		
Underground	250	250	100 %	0	0 %		
Regulators/ Capacitors (Voltage Regulation)							
Overhead	911	911	100 %	0	0 %		
Underground	7	7	100 %	0	0 %		
Conductors & Cables							
Overhead 15	16,658	16,658	100%	0	0 %		
Underground ¹⁶	2,062	2,062	100 %	0	0 %		

Table includes Grade 2 conditions that were identified in year 2000 and prior years.

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

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

¹⁶ In addition to UG cable, conditions reported in this table include Grounds, Hardware, and Connectors.

E. CORRECTIVE ACTION SCHEDULED FOR 2001¹⁷:

	Total	Percentage of
	Conditions	Grade 2
	Scheduled for	Conditions
	2001	Identified in 2000
Transformers	2,327	46.5%
Switching/Protective	2,594	73.0%
Devices		
Regulators/	269	22.2%
Capacitors		
Overhead Conductor	15,740	75.0%
and Cable ¹⁸		

F. CORRECTIVE ACTION SCHEDULED FOR 2002¹⁹:

	Total	Percentage of
	Conditions	Grade 2
	Scheduled for	Conditions
	2002	Identified in 2000
Transformers	1,474	29.4%
Switching/Protective	484	13.6%
Devices		
Regulators/	57	4.7%
Capacitors		
Overhead Conductor	5,032	24.0%
and Cable ²⁰		

Table includes Grade 2 conditions that were identified in year 2000 and prior years.

In addition to OH conductor, conditions reported in this table include Grounds, Jumpers & Connectors, Pole Hardware, and Guying. In addition to UG cable, conditions reported in this table include Grounds, Hardware, and Connectors.

¹⁹ Table includes Grade 2 conditions that were identified in year 2000 and prior years.

In addition to OH conductor, conditions reported in this table include Grounds, Jumpers & Connectors, Pole Hardware, and Guying. In addition to UG cable, conditions reported in this table include Grounds, Hardware, and Connectors.

VI. INTRUSIVE INSPECTION

A. WOOD POLES:

Number of Wood Poles by Area/ Division	Wood Poles Scheduled for Inspection ²¹	Wood Poles not Inspected	Reason inspection was not completed	Date inspection will be completed ²²
Central Coast	0	0		
De Anza	0	0		
Diablo	0	0		
East Bay	0	0		
Fresno	11,500	11,500	Schedule was modified to	12/04
			accommodate 10-year Pole Test and	
			Treat Program	
Kern	80,680	0		
Los Padres	0	0		
Mission	0	0		
North Bay	0	0		
North Coast	0	0		
North Valley	54	0		
Peninsula	0	0		
Sacramento	0	0		
San Francisco	0	0		
San Jose	0	0		
Sierra	0	0		
Stockton	0	0		
Yosemite	0	0		
Total	92,234	11,500		

Total does not include poles scheduled in prior years and rescheduled into year 2000. For a complete summary of PG&E's 10-year Pole Test and Treat program and progress reports, see PG&E's compliance filings submitted pursuant to Ordering Paragraph 21 of Decision No. 99-06-080 to the Energy Division.

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 2000:

		Corrective Action Required ²³			No Corrective		
Facilities	Number of				Action		
	Wood	Grade 1 ^A Grade 2 ^{B,24}		Required			
	Poles ²⁵	Number	Percent	Number	Percent	Number	Percent
Wood Poles	2,175,438	1,301	0.1	34,755	1.6	2,139,382	98.3

^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.

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.

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

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

C. CORRECTIVE ACTION SCHEDULED FOR 2000²⁶:

Poles Facilities scheduled for		Number of	Number of Wood Poles		Vood Poles	Date correction will be
	correction ²⁷	Corrected	Percentage	Not corrected	Percentage	completed
						Work completed
Wood Poles	10,762	10,757	99.9%	5	.1%	as of 5/3/2001

Reason why correction was not completed:

Current resources were unavailable so a contractor was hired. The contractor was unable to complete the work prior to 12/31/2000.

D. CORRECTIVE ACTION SCHEDULED FOR 2001²⁸:

Facilities	Number of Poles Scheduled for Corrective Action in 2001	Percentage of Grade 2 Poles Identified in 2000		
Wood Poles	10,078	29.0%		

E. CORRECTIVE ACTION SCHEDULED FOR 2002²⁹:

Facilities	Number of Poles Scheduled for Corrective Action in 2002	Percentage of Grade 2 Poles Identified in 2000		
Wood Poles	10,823	31.1%		

Table includes conditions that were identified in year 2000 and prior years.

This does not represent all poles replaced in 2000. This number does not included all replaced overstressed poles that were not entered into the computerized maintenance system.

Table includes conditions that were identified in year 2000 and prior years.

Table includes conditions that were identified in year 2000 and prior years.

F. CORRECTIVE ACTION SCHEDULED FOR 2003³⁰:

Facilities	Number of Poles Scheduled for Corrective Action in 2003	Percentage of Grade 2 Poles Identified in 2000	
Wood Poles	10,277	29.6%	

G. CORRECTIVE ACTION SCHEDULED FOR 2004³¹:

Facilities	Number of Poles Scheduled for Corrective	Percentage of Grade 2 Poles
	Action in 2004	Identified in 2000
Wood Poles	2,804	8.1%

H. CORRECTIVE ACTION SCHEDULED FOR 2005³²:

Facilities	Number of Poles Scheduled for Corrective	Percentage of Grade 2 Poles	
	Action in 2005	Identified in 2000	
Wood Poles	23,252	66.9%	

I. CORRECTIVE ACTION SCHEDULED FOR 2006³³:

Facilities	Number of Poles Scheduled for Corrective Action in 2006	Percentage of Grade 2 Poles Identified in 2000
Wood Poles	7,706	22.2%

Table includes conditions that were identified in year 2000 and prior years.

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