# PACIFIC GAS & ELECTRIC COMPANY

# GENERAL ORDER 165 COMPLIANCE PLAN FOR 2003

# AND ANNUAL COMPLIANCE REPORT FOR 2001

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

July 1, 2002

**PACIFIC GAS & ELECTRIC COMPANY**
**GENERAL ORDER 165 COMPLIANCE PLAN FOR 2003**
**AND ANNUAL COMPLIANCE REPORT FOR 2001**

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 2003. Attached as Appendix A is the Compliance Plan, which describes how PG&E intends to comply in 2003 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 2001.

The numbers of overhead and underground distribution facilities referred to in this report are necessarily based on estimates. PG&E's overhead and underground electric system is complex and dynamic. Equipment quantities and system configurations change continually. These changes occur as a result of adding and removing equipment to accommodate new customer connections and load growth, requests from customers and Local City/and or Governmental Agencies to relocate facilities, the sale and/or acquisition of existing distribution systems, the retirement of aging plant, etc.

# 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 to PG&E's Electric Preventive Maintenance Plan. For 2003, PG&E will be patrolling 100% of its electric urban distribution facilities and in parts of its system will begin transitioning to perform 50% of its electric rural distribution facilities each year.

# COMPLIANCE PLAN (Cont.)

## II. DETAILED INSPECTIONS SCHEDULED FOR 2003[1]

## A. OVERHEAD[2] FACILITIES

| *Number of Poles by Area/Division*[3] | *Jan. - Mar.* | *Apr. - Jun.* | *Jul. - Sep.* | *Oct. - Dec.* | **Total** |
|---|---|---|---|---|---|
| Central Coast | 6,372 | 9,564 | 9,558 | 0 | 25,494 |
| De Anza | 6,912 | 2,167 | 0 | 0 | 9,079 |
| Diablo | 3,729 | 3,729 | 3,727 | 1,242 | 12,427 |
| East Bay | 2,502 | 2,505 | 2,506 | 2,502 | 10,015 |
| Fresno | 10,002 | 15,000 | 15,003 | 10,002 | 50,007 |
| Kern | 6,459 | 6,458 | 6,456 | 6,456 | 25,829 |
| Los Padres | 5,010 | 5,010 | 5,210 | 5,168 | 20,398 |
| Mission | 2,630 | 3,946 | 3,948 | 2,631 | 13,155 |
| North Bay | 5,007 | 5,007 | 5,007 | 5,010 | 20,031 |
| North Coast | 11,784 | 11,784 | 11,784 | 7,856 | 43,208 |
| North Valley | 9,500 | 12,500 | 12,000 | 5,358 | 39,358 |
| Peninsula | 4,286 | 4,286 | 4,286 | 4,285 | 17,143 |
| Sacramento | 4,287 | 4,287 | 4,287 | 4,285 | 17,146 |
| San Francisco | 2,010 | 2,010 | 2,010 | 1,005 | 7,035 |
| San Jose | 3,681 | 3,681 | 3,681 | 1,227 | 12,270 |
| Sierra | 10,500 | 13,500 | 13,000 | 3,477 | 40,477 |
| Stockton | 7,000 | 9,700 | 9,700 | 6,800 | 33,200 |
| Yosemite | 13,023 | 16,047 | 16,047 | 10,698 | 55,815 |
| Total | 114,694 | 131,181 | 128,210 | 78,002 | 452,087 |

[1] The quarterly system inspection schedules are estimates in which events in the field may cause variations; the planned results by the end of the year are anticipated to meet the requirements of G.O. 165.

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

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

# COMPLIANCE PLAN (Cont.)

## B. UNDERGROUND[4] FACILITIES

| *Number of Enclosures by Area/Division* | | *Jan. - Mar.* | *Apr. - Jun.* | *Jul. - Sep.* | *Oct. - Dec.* | **Total** |
|---|---|---|---|---|---|---|
| | | | | | | |
| Central Coast | | 942 | 1,413 | 1,413 | 7 | 3,775 |
| De Anza | | 1,635 | 1,635 | 1,279 | 0 | 4,549 |
| Diablo | | 2,634 | 2,634 | 2,632 | 877 | 8,777 |
| East Bay | | 1,164 | 1,164 | 1,164 | 1,164 | 4,656 |
| Fresno | | 1,551 | 2,328 | 2,330 | 1,551 | 7,760 |
| Kern | | 744 | 744 | 741 | 741 | 2970 |
| Los Padres | | 696 | 696 | 696 | 696 | 2784 |
| Mission | | 2,368 | 3,552 | 3,555 | 2,370 | 11,845 |
| North Bay | | 1,083 | 1,083 | 1,083 | 1,085 | 4,334 |
| North Coast | | 1,626 | 1,626 | 1,626 | 1,084 | 5,962 |
| North Valley | | 550 | 800 | 900 | 510 | 2760 |
| Peninsula | | 1,659 | 1,658 | 1,658 | 1,658 | 6,633 |
| Sacramento | | 1,395 | 1,395 | 1,395 | 1,400 | 5,585 |
| San Francisco | | 1,110 | 1,110 | 1,110 | 549 | 3,879 |
| San Jose | | 2,448 | 2,448 | 2,448 | 816 | 8,160 |
| Sierra | | 0 | 1,800 | 1,000 | 885 | 3,685 |
| Stockton | | 850 | 1,300 | 1,400 | 1,042 | 4,592 |
| Yosemite | | 405 | 810 | 810 | 301 | 2326 |
| Total | | 22,860 | 28,196 | 27,240 | 16,736 | 95,032 |

[4] 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 2003[5,]

| Number of Poles | Jan. - Mar. | Apr. - Jun. | Jul. - Sep. | Oct. - Dec. | Total[6] |
|---|---|---|---|---|---|
| System | 15,000 | 21,000 | 21,000 | 21,000 | 78,000 |

[5] PG&E is currently conducting a wood pole test and treat program of poles over 10 years old. The program began in November, 1994.

[6] Total does not include poles scheduled in prior years and rescheduled into year 2003. PG&E plans to test and treat a total of approximately 233,500 poles in 2003. For a complete summary of PG&E's 10-year Pole Test and Treat program and progress report, see PG&E's compliance filing submitted pursuant to Ordering Paragraph 21 of Decision No. 99-06-080 to the Energy Division.

**APPENDIX B**

**2001 ANNUAL REPORT**

## I. PATROLS

### 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 | 699,612 | 13,788 | The poles indicated as not being patrolled are a result of the following:<br>1) The scheduled patrols in 2001 were based on estimates; the actual number completed was less than the estimate.<br>2) Some rural poles were included in the 2001 estimated schedule, which were not patrolled, and not required to be patrolled. Only patrols on urban facilities were required in 2001.<br>3) Poles scheduled for patrols were inspected instead.<br>4) Poles have been either sold or removed from the system. | No date necessary since requirement was met. |

### 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 | 136,559 | 0 | Not applicable | |

## II. DETAILED INSPECTIONS

### A. OVERHEAD[7] FACILITIES:

| Area/ Division | Number of Poles Scheduled for Inspection | Number of Poles not Inspected | Reason inspection was not completed | Date by which inspections will be completed |
|---|---|---|---|---|
| Central Coast | 30,725 | 5,104 | The actual number of poles inspected was less than the estimated.[8] | No date necessary since requirement was met. |
| De Anza | 9,760 | 0 | Not applicable | |
| Diablo | 12,442 | 0 | Not applicable | |
| East Bay | 12,269 | 0 | Not applicable | |
| Fresno | 57,408 | 559 | The actual number of poles inspected was less than the estimated. | No date necessary since requirement was met. |
| Kern | 28,868 | 2,382 | The actual number of poles inspected was less than the estimated. | No date necessary since requirement was met. |
| Los Padres | 20,527 | 0 | Not applicable | |
| Mission | 11,798 | 25 | The actual number of poles inspected was less than the estimated. | No date necessary since requirement was met. |
| North Bay | 15,434 | 3 | The difference is due to the removal of idle facilities. | No date necessary. |
| North Coast | 34,615 | 0 | Not applicable | |
| North Valley | 49,425 | 634 | The actual number of poles inspected was less than the estimated. | No date necessary since requirement was met. |
| Peninsula | 13,498 | 0 | Not applicable | |
| Sacramento | 24,852 | 2,895 | The actual number of poles inspected was less than the estimated. | No date necessary since requirement was met. |
| San Francisco | 7,700 | 205 | The actual number of poles inspected was less than the estimated. | No date necessary since requirement was met. |
| San Jose | 12,221 | 0 | Not applicable | |
| Sierra | 43,661 | 3,873 | The actual number of poles inspected was less than the estimated. | No date necessary since requirement was met. |
| Stockton | 31,463 | 0 | Not applicable | |
| Yosemite | 47,414 | 0 | Not applicable | |
| Total | 464,080 | 15,680 | | |

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

[8] See discussion of estimating practices on page 1 of this report.

## B. UNDERGROUND[9] FACILITIES:

| Area/ Division | Number of Enclosures Scheduled for Inspection | Number of Enclosures not Inspected | Reason inspection was not completed | Date by which inspections will be completed |
|---|---|---|---|---|
| Central Coast | 3,997 | 0 | Not applicable | |
| De Anza | 4,000 | 501 | The initial inspection plan for 2001 was changed and these inspections were rescheduled for 2002. This schedule complies with the inspection cycles in GO 165. | 12/31/2002 |
| Diablo | 8,509 | 0 | Not applicable | |
| East Bay | 4,455 | 295 | The actual number of enclosures inspected was less than the estimated. | No date necessary since requirement was met. |
| Fresno | 7,166 | 0 | Not applicable | |
| Kern | 4,390 | 0 | Not applicable | |
| Los Padres | 1,812 | 0 | Not applicable | |
| Mission | 8,922 | 0 | Not applicable | |
| North Bay | 3,955 | 0 | Not applicable | |
| North Coast | 7,056 | 0 | Not applicable | |
| North Valley | 3,130 | 0 | Not applicable | |
| Peninsula | 4,440 | 181 | The actual number of enclosures inspected was less than the estimated. | No date necessary since requirement was met. |
| Sacramento | 5,136 | 75 | The actual number of enclosures inspected was less than the estimated. | No date necessary since requirement was met. |
| San Francisco | 5,300 | 679 | The actual number of enclosures inspected was less than the estimated. | No date necessary since requirement was met. |
| San Jose | 8,192 | 401 | The actual number of enclosures inspected was less than the estimated. | No date necessary since requirement was met. |
| Sierra | 5,230 | 682 | The actual number of enclosures inspected was less than the estimated. | No date necessary since requirement was met. |
| Stockton | 4,720 | 0 | Not applicable | |
| Yosemite | 2,738 | 0 | Not applicable | |
| Total | 93,14893,148 | 2814 | | |

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

## C. IDENTIFIED CONDITIONS[10] IN 2001:

| Facilities* | Estimated[11] quantity | Corrective Action Required | | | | No Corrective Action Required | |
|---|---|---|---|---|---|---|---|
| | | Grade 1[A] | | Grade 2[B] | | | |
| | | Number | Percent | Number | Percent | Number | Percent |
| Transformers | | | | | | | |
| Overhead | 785,702 | 3,275 | 0.4% | 2,522 | 0.3% | 779,905 | 99.3% |
| Underground** | 171,064 | 504 | 0.3% | 2,088 | 1.2% | 168,472 | 98.5% |
| Switches/ Disconnects | | | | | | | |
| Overhead | 147,423 | 964 | 0.7% | 1,821 | 1.2% | 144,638 | 98.1% |
| Underground | 94,451 | 63 | 0.1% | 439 | 0.5% | 93,949 | 99.4% |
| Protective Devices[12] | | | | | | | |
| Overhead | 4,172 | 98 | 2.4% | 743 | 17.8% | 3,331 | 79.8% |
| Underground | 635 | 7 | 1.1% | 24 | 3.8% | 604 | 95.1% |
| Voltage Regulation[13] | | | | | | | |
| Overhead | 13,924 | 129 | 0.9% | 1,516 | 10.9% | 12,279 | 88.2% |
| Underground | N/A[14] | 2 | N/A | 33 | N/A | N/A | N/A |
| Conductors & Cables | | | | | | | |
| Overhead[15] | N/A | 8,633 | N/A | 23,619 | N/A | N/A | N/A |
| Underground[16] | N/A | 2,339 | N/A | 8,768 | 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 include 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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10 Conditions listed in this section of the Report include conditions identified during patrols and inspections conducted only in 2001.

11 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.

12 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 reclosures. The number of Lightning Arrestors installed on the distribution system is not available, and therefore not included in the "estimated quantity" of Protective Devices. However, conditions associated with lightening arrestors are included in the "Corrective Action Required" column.

13 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.

14 N/A means "not available."

15 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.

## D. CORRECTIVE ACTION SCHEDULED FOR 2001[17]:

| Facilities | Conditions scheduled for correction | Number of facilities | | Number of facilities | | Reason why correction was not completed | Date[18] correction will be completed |
|---|---|---|---|---|---|---|---|
| | | Corrected[19] | Percentage | Not Corrected | Percentage | | |
| Transformers | | | | | | | |
| Overhead | 2,441 | 2,441 | 100% | 0 | 0% | Not applicable | |
| Underground | 1,389 | 1,389 | 100% | 0 | 0% | Not applicable | |
| | | | | | | | |
| Switches/ Protective Devices (Disconnects) | | | | | | | |
| Overhead | 3,436 | 3,436 | 100% | 0 | 0% | Not applicable | |
| Underground | 356 | 356 | 100% | 0 | 0% | Not applicable | |
| | | | | | | | |
| Regulators/ Capacitors (Voltage Regulation) | | | | | | | |
| Overhead | 1,339 | 1,339 | 100% | 0 | 0% | Not applicable | |
| Underground | 7 | 7 | 100% | 0 | 0% | Not applicable | |
| | | | | | | | |
| Conductors & Cables | | | | | | | |
| Overhead[20] | 32,891 | 32,885 | 99.9% | 6 | 0.1% | Reason below | 11/2002 |
| Underground[21] | 9,995 | 9,995 | 100% | 0 | 0% | Not applicable | |
| | | | | | | | |

Reason why corrections were not completed:

Four tags contained incorrect information in the database. Two of the four tags had actually been completed in 2001, and two are complete but the date complete is unknown. For the remaining two tags; one tag had construction delayed as a result of bad weather, and the other tag had a property owner who would not allow access to the facilities.

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17 Table includes conditions that were identified in year 2001 and prior years.

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

19 A facility, reported as corrected, may have been repaired, replaced, cleaned, adjusted, removed, re-evaluated, or received other appropriate action.

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

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

## E. CORRECTIVE ACTION SCHEDULED FOR 2002:

| | Number of Grade 2 Conditions Identified in 2001 | Total[22] Conditions Scheduled for 2002 | Percentage of Grade 2 Conditions Identified in 2001 |
|---|---|---|---|
| Transformers | 4,610 | 3,541 | 76.8% |
| | | | |
| Switching/Protective Devices | 3,027 | 1,797 | 59.4% |
| | | | |
| Regulators/ Capacitors | 1,549 | 538 | 34.7% |
| | | | |
| Overhead Conductor and Cable[23] | 32,387 | 25,047 | 77.3% |

## F. CORRECTIVE ACTION SCHEDULED FOR 2003:

| | Number of Grade 2 Conditions Identified in 2001 | Total[24] Conditions Scheduled for 2003 | Percentage of Grade 2 Conditions Identified in 2001 |
|---|---|---|---|
| Transformers | 4,610 | 1,020 | 22.1% |
| | | | |
| Switching/Protective Devices | 3,027 | 423 | 14.0% |
| | | | |
| Regulators/ Capacitors | 1,549 | 49 | 3.2% |
| | | | |
| Overhead Conductor and Cable[25] | 32,387 | 8,315 | 25.7% |

[22] Table includes conditions that were identified in year 2001 and prior years.

[23] 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.

[24] See footnote 22.

[25] See footnote 23.

## III. INTRUSIVE INSPECTION

### A. WOOD POLES[26]:

| 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[27] |
|---|---|---|---|---|
| Central Coast | 0 | 0 | Not applicable | |
| De Anza | 0 | 0 | Not applicable | |
| Diablo | 0 | 0 | Not applicable | |
| East Bay | 0 | 0 | Not applicable | |
| Fresno | 0 | 0 | Not applicable | |
| Kern | 30,504 | 0 | Not applicable | |
| Los Padres | 0 | 0 | Not applicable | |
| Mission | 0 | 0 | Not applicable | |
| North Bay | 0 | 0 | Not applicable | |
| North Coast | 0 | 0 | Not applicable | |
| North Valley | 9,175 | 0 | Not applicable | |
| Peninsula | 0 | 0 | Not applicable | |
| Sacramento | 0 | 0 | Not applicable | |
| San Francisco | 0 | 0 | Not applicable | |
| San Jose | 0 | 0 | Not applicable | |
| Sierra | 0 | 0 | Not applicable | |
| Stockton | 0 | 0 | Not applicable | |
| Yosemite | 0 | 0 | Not applicable | |
| Total | 39,679 | 0 | | |

[26] Table does not include poles that have been re-scheduled from prior years. Actual completed inspection performed in 2001 were 215,004 poles.

[27] 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 2001:

| Facilities | Number of Wood Poles[30] | Corrective Action Required[28] | | | | No Corrective Action Required | |
|---|---|---|---|---|---|---|---|
| | | Grade 1[A] | | Grade 2[B,29] | | | |
| | | Number | Percent | Number | Percent | Number | Percent |
| Wood Poles | 2,175,438 | 1,661 | 0.08% | 26,082 | 1.2% | 2,147,695 | 98.72% |

**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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28 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.

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

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

## C. CORRECTIVE ACTION SCHEDULED FOR 2001[31]:

| Facilities | Poles scheduled for correction | Number of Wood Poles | | Number of Wood Poles | | Date correction will be completed |
|---|---|---|---|---|---|---|
| | | Corrected[32] | Percentage | Not corrected | Percentage | |
| Wood Poles | 9,388 | 9,388 | 100% | 0 | 0% | Not applicable |

## D. CORRECTIVE ACTION SCHEDULED FOR 2002:

| Facilities | Number of Grade 2 Poles Identified in 2001 | Number of Poles Scheduled for Corrective Action in 2002[33] | Percentage of Grade 2 Poles Identified in 2001 |
|---|---|---|---|
| Wood Poles | 26,082 | 18,316 | 70.2% |

## E. CORRECTIVE ACTION SCHEDULED FOR 2003:

| Facilities | Number of Grade 2 Poles Identified in 2001 | Number of Poles Scheduled for Corrective Action in 2003[34] | Percentage of Grade 2 Poles Identified in 2001 |
|---|---|---|---|
| Wood Poles | 26,082 | 4,556 | 17.5% |

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[31] Table includes conditions that were identified in year 2001 and prior years.

[32] A facility, reported as corrected, may have been repaired, replaced, adjusted, removed, re-evaluated, or received other appropriate action.

[33] See footnote 31.

[34] See footnote 31.

## F. CORRECTIVE ACTION SCHEDULED FOR 2004:

| Facilities | Number of Grade 2 Poles Identified in 2001 | Number of Poles Scheduled for Corrective Action in 2004[35] | Percentage of Grade 2 Poles Identified in 2001 |
|---|---|---|---|
| Wood Poles | 26,082 | 1,000 | 3.8% |

## G. CORRECTIVE ACTION SCHEDULED FOR 2005:

| Facilities | Number of Grade 2 Poles Identified in 2001 | Number of Poles Scheduled for Corrective Action in 2005[36] | Percentage of Grade 2 Poles Identified in 2001 |
|---|---|---|---|
| Wood Poles | 26,082 | 11,690 | 44.8% |

## H. CORRECTIVE ACTION SCHEDULED FOR 2006:

| Facilities | Number of Grade 2 Poles Identified in 2001 | Number of Poles Scheduled for Corrective Action in 2006[37] | Percentage of Grade 2 Poles Identified in 2001 |
|---|---|---|---|
| Wood Poles | 26,082 | 6,996 | 26.8% |

## I. CORRECTIVE ACTION SCHEDULED FOR 2007:

| Facilities | Number of Grade 2 Poles Identified in 2001 | Number of Poles Scheduled for Corrective Action in 2007[38] | Percentage of Grade 2 Poles Identified in 2001 |
|---|---|---|---|
| Wood Poles | 26,082 | 4,203 | 16.1% |

[35] Table includes conditions that were identified in year 2001 and prior years.

[36] See footnote 35.

[37] See footnote 35.

[38] See footnote 35.

2003 COMPLIANCE PLAN - APPENDIX A



2001 ANNUAL REPORT - APPENDIX B