SDGE

A Sempra Energy utility

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June 29, 2007

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

Re: Electric Distribution Standards Proceeding – SDG&E's General Order 165 Annual Corrective Maintenance Report

Dear Docket Clerk:

Pursuant to California Public Utilities Commission (CPUC) Decision 97-03-070, enclosed please find the original and five (5) copies of San Diego Gas & Electric Company's General Order 165 Annual Corrective Maintenance Report.

A copy of this filing is being served electronically to all parties of record in R.96-11-004 as evidenced by the attached Certificate of Service.

Sincerely,

Todd Cahill
Regulatory Tariff Manager

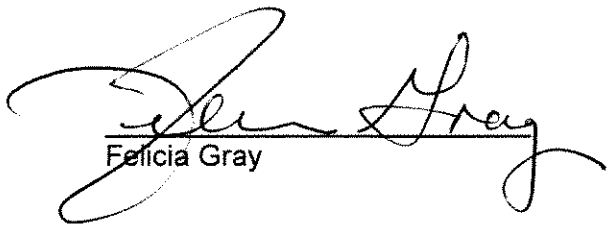
Enclosure

cc: Parties of Record in R.96-11-004

CERTIFICATE OF SERVICE

I hereby certify that I have this day served via electronic mail a true copy of San Diego Gas & Electric Company's General Order 165 Annual Corrective Maintenance Report to the service list for R.96-11-004

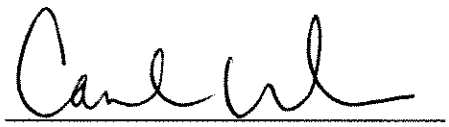
Dated: June 29, 2007



Felicia Gray

VERIFICATION

Upon information and belief, I declare under penalty of perjury under the laws of the Sate of California that the contents of this report are true, signed this 29th day of June 2007, in San Diego, California.



Caroline Winn, Director

Transmission & Distribution Asset Management

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SAN DIEGO GAS & ELECTRIC COMPANY

CORRECTIVE MAINTENANCE PROGRAM

REPORT FOR

2006

This report contains the results of San Diego Gas & Electric Company's (SDG&E) General Order (GO) 165 compliance program for inspection and maintenance of electric distribution facilities and covers the period from January 1, 2006 through December 31, 2006.

SDG&E's GO 165 compliance program is called the Corrective Maintenance Program (CMP) and is managed by SDG&E's Electric Transmission and Distribution organization. Through coordination with the Construction & Operations (C&O) Centers' Electric Supervisors, Inspectors, Linemen, and other personnel, the inspections required by GO 165 are performed and follow-up work to correct deficiencies is completed. The CMP uses the DIMS (Distribution Inspection Maintenance System) electronic database to schedule, record, and track all inspections and repair work required under GO 165. Monthly status reports are produced to track the progress of the inspections and repair work.

Summary of the 2006 Year End Report

SDG&E continues to have the goal of correcting infractions found during GO165 inspections within a 12-month time-frame from date of inspection. Infractions that may pose a hazard to the public and/or to electric distribution line personnel are repaired within a shorter timeframe, relative to the severity of the infraction and the nature of the hazard. Third Party Infractions that are out of the control of SDG&E, such as those involving private property, environmental and other utilities' issues, may require more time to be resolved. These infractions are noted as "Pending" within our record keeping process and put in the "Deferred" category. Pending infractions in the Deferred category are tracked by SDG&E's Transmission and Distribution (T&D) Asset Management, Vegetation Management, Land Management and Legal departments. These departments continue to refine the process for resolving third party infractions as outlined in Appendix A. Facilities that are considered for and granted Deferral status must meet strict internal requirements.

To assure compliance with GO 165 inspection requirements and SDG&E's 12-month time-frame from date of inspection to complete corrections and/or required maintenance, SDG&E has developed a centralized Quality Assurance program and established criteria for C&O Center internal audits. Internal audits cover inspections and repairs to verify that infractions are identified and corrected.

CORRECTIVE

MAINTENANCE

PROGRAM

DETAILED

INSPECTIONS

REPORT

CPUC 2006 Yearend Report

District	Inspect Type	Total Structures	Total Structures Scheduled	Percent Structures Scheduled	Total Structures Inspected	Percent Scheduled Inspected	Inspected in 2005 cleared in 2006	Inspected in 2006 cleared in 2006	Inspected in 2006, pending
Beach Cities									
	AGE	12,384	2,430	19.62%	2,430	100.00%	37	2,044	78
	AGI	4,681	1,006	21.49%	1,006	100.00%	24	855	60
	OHVI	22,497	4,996	22.21%	4,996	100.00%	1,449	3,740	1,500
	POIN	19,495	138	0.71%	138	100.00%	30	20	3
	SS3	273	75	27.47%	75	100.00%	0	43	1
	SWI	491	147	29.94%	147	100.00%	1	122	29
Eastern									
	AGE	10,474	1,732	16.54%	1,732	100.00%	158	1,170	112
	AGI	2,856	817	28.61%	817	100.00%	70	647	69
	OHVI	58,738	11,818	20.12%	11,818	100.00%	5,152	3,402	4,242
	POIN	51,234	18,355	35.83%	18,355	100.00%	517	17,952	290
	SS3	38	12	31.58%	12	100.00%	0	4	2
	SWI	132	46	34.85%	46	100.00%	4	34	9
Metro									
	AGE	12,751	2,583	20.26%	2,583	100.00%	1,008	2,087	771
	AGI	3,612	734	20.32%	734	100.00%	120	542	123
	OHVI	42,966	8,810	20.50%	8,810	100.00%	3,475	2,897	3,313
	POIN	38,446	273	0.71%	273	100.00%	19	74	9
	SS3	506	109	21.54%	109	100.00%	22	70	8
	SWI	449	94	20.94%	94	100.00%	16	33	24
North Coast									
	AGE	19,352	3,390	17.52%	3,390	100.00%	1,172	2,817	746
	AGI	3,635	732	20.14%	732	100.00%	146	505	215
	OHVI	23,741	4,906	20.66%	4,906	100.00%	1,950	4,334	1,651
	POIN	21,433	1,341	6.26%	1,341	100.00%	1	1,088	76
	SS3	72	19	26.39%	19	100.00%	1	15	5
	SWI	258	78	30.23%	78	100.00%	19	75	17
North East									
	AGE	21,635	3,682	17.02%	3,682	100.00%	581	2,533	813
	AGI	4,595	1,277	27.79%	1,277	100.00%	96	909	335
	OHVI	63,979	13,569	21.21%	13,569	100.00%	3,667	5,984	2,830
	POIN	60,277	448	0.74%	448	100.00%	352	727	20
	SS3	4	2	50.00%	2	100.00%	0	0	0
	SWI	250	64	25.60%	64	100.00%	3	49	8
Orange County									
	AGE	10,646	1,962	18.43%	1,962	100.00%	237	1,753	580
	AGI	2,037	450	22.09%	450	100.00%	35	399	155
	OHVI	5,617	1,161	20.67%	1,161	100.00%	278	746	198
	POIN	4,926	32	0.65%	32	100.00%	0	1	0
	SS3	215	49	22.79%	49	100.00%	0	46	5
	SWI	150	35	23.33%	35	100.00%	1	35	25

Division of Inspections

The quantity of facilities is dynamic because of additions and removals of equipment due to maintenance, demolition, new customers, new technology, reliability and conversion of overhead lines to underground lines or other changes to the electric distribution system. When new equipment is added, it is regarded as inspected at date of installation. The new piece of equipment is then scheduled for inspection during the next inspection cycle. All equipment in the current inventory is scheduled for inspection at the required interval.

All facilities scheduled for inspection in 2007 are included as Attachment "A" in accordance with GO 165. Equipment inspections are divided into categories of equipment type, subdivided by district, and further subdivided by geographic region. Actual inspections per month may vary due to operating conditions, weather, administrative shifts in inspection areas, or other unanticipated impacts.

All equipment on a given structure is inspected at the same time and the inspection record is documented in the structure record. The CMP goals for the year are determined by the system-wide counts of facilities in each inspection type, divided by the number of years in the cycle length.

SDG&E CMP cycles are designed to match General Order 165 requirements. The following section describes SDG&E's CMP cycles by equipment type.

Description of Major SDG&E CMP Cycles

OVERHEAD VISUAL

- OHVI (Overhead Visual, 5-year)

  This cycle consists of a detailed walk-around inspection of all distribution poles, pole-mounted facilities with primary and secondary conductors, and distribution equipment on transmission poles. These inspections identify conditions out of compliance with GO95. This is a five-year cycle.

ABOVE GROUND 5 (INTERNAL AND EXTERNAL INSPECTIONS)

This cycle consists of AGE (Above Ground Deadfront) and AGI (Above Ground Livefront) detailed external and internal inspections of deadfront and livefront pad-mounted facilities to identify conditions out of compliance with GO 128.

- AGE (Above Ground Deadfront, 5- year)

  This cycle consists of a detailed external and internal inspection of deadfront pad-mounted facilities to identify conditions out of compliance with GO128. This is a five-year inspection cycle. The AGE cycle originally only required an external inspection; however, changes in 1999 modified this requirement to include an internal inspection. The cycle is still named AGE to separate the deadfront equipment data from livefront equipment data.

- AGI (Above Ground Livefront, 5- year)

  This cycle consists of a detailed external and internal inspection of livefront pad-mounted facilities to identify conditions out of compliance with GO128. This is a five-year inspection cycle.

SUBSURFACE, WITH EQUIPMENT

- SS3 (Subsurface, 3-year)

  This cycle consists of a detailed inspection of subsurface structures (manholes, vaults, primary handholes and subsurface enclosures) containing distribution equipment. (Thus, structures with cable taps, splices or pass throughs only are in the SS10 cycle.) The SS3 cycle consists of a detailed inspection of these facilities to identify conditions out of compliance with GO128. This is a three-year inspection cycle

  SUBSURFACE, NO EQUIPMENT (Not Required by GO 165)

- SS10 (Subsurface, 10-year)

  Subsurface enclosures, vaults, handholes and manholes without equipment are not required to be inspected under GO 165. However, GO 128, does require that all equipment be in safe and reliable operating condition. Therefore, SDG&E has implemented a 10-year inspection cycle to address these facilities. This cycle consists of a detailed inspection of these facilities to identify conditions out of compliance with GO128.

SWITCH

- SW3 (Oil, Air, Vacuum or Gas Switch, 3-year)

  This is a three-year cycle that consists of a specialized inspection of all subsurface and pad-mounted oil, air, vacuum and gas switches. There are approximately 1,750 switches in this cycle. Oil samples and gas pressure

readings are obtained and recorded in the Distribution Inspection and Maintenance System (DIMS). The laboratory performs analysis of oil samples for low dielectric strength and high water content. These results and the inspection records are stored in DIMS. The status of "Do Not Operate Energized" (DOE) switches for prioritizing replacements are also tracked in DIMS. Other conditions out of compliance with GO128 are also identified.

WOOD POLE INTEGRITY

- Pole (10/20 year)

These inspections are performed on a 10-year cycle. Each pole is inspected visually and if conditions warrant, intrusively. Any pole 15 years of age or older is inspected intrusively. The form of the intrusive inspection is normally an excavation about the pole base and/or a sound and bore of the pole at ground line. Treatment is applied at this time in the form of ground line pastes and/or internal pastes. The 10-year cycle fulfills the requirements of GO165, which are: 1) all poles over 15 years of age are intrusively inspected within 10 years and 2) all poles which previously passed intrusive inspection are to be inspected intrusively again on a 20 year cycle. The 10-year cycle requirements result in approximately 23,200 poles to be inspected each year.

The wood pole integrity inspections are currently performed by a SDG&E contractor who also applies wood preservative treatments and installs mechanical reinforcements (C-truss or Fiberwrap). The type of treatment is dependent upon the age of the pole, the individual inspection history, and the overall condition of the structure. SDG&E's Vegetation Management group administers the wood pole intrusive inspection and treatment program.

If a pole that appears to need replacement is found on a CMP inspection, SDG&E's contractor for wood pole integrity inspections or the Districts may bore into the pole to determine if it needs reinforcement or replacement based on the remaining shell thickness. The choice to restore a pole rather than replace the pole is based on the strength of the pole which is measured by remaining shell thickness. SDG&E's Transmission Engineering and

Electric Distribution Standards Specification for Inspection, Treatment and Reinforcement of In-Service Wood Poles (Specification NO. TE-0108 and Specification NO. 337) specifies the criteria for the rejection of a pole. It also addresses a pole's suitability for C-truss or Fiber-wrap based on the remaining shell thickness for various lengths of pole. If a pole does not have sufficient shell thickness for C-truss or Fiber-wrap, it is rejected and replaced.

PATROL, URBAN

- Patrol 1 (urban patrol, 1 year)

The purpose of the urban patrol is to identify obvious structural problems and hazards. This cycle consists of a drive by, fly by, or walk-by inspection of every overhead, underground and streetlight facility in urban areas. Under agreement of interpretation with the CPUC, 'urban' is defined as incorporated areas. (GO165 defined 'urban' as those areas with 1000 persons or more per square mile). The General Order defines a patrol as a "simple visual inspection, of applicable utility equipment and structures that is designed to identify obvious structural problems and hazards." Patrol Inspection Record forms are used to identify obvious structural problems and hazards, which are also recorded in DIMS.

PATROL, RURAL

- Patrol 2 (rural patrol, 2 year)

The purpose of the rural patrol is to identify obvious structural problems and hazards. This cycle consists of a drive by, fly by, or walk-by inspection of every overhead, underground and streetlight facilities in rural areas. Under agreement of

interpretation with the CPUC, 'rural' is defined as unincorporated areas. (GO165 defined 'rural' as those areas with less than 1000 persons per square mile). The General Order defines a patrol as a "simple visual inspection, of applicable utility equipment and structures that is designed to identify obvious structural problems and hazards." Patrol Inspection Record forms are used to identify obvious structural problems and hazards, which are also recorded in DIMS.

SDG&E CMP INSPECTION CYCLES
CYCLES FROM SDGE'S FILED COMPLIANCE PLAN

SDG&E System Inspection Cycles
(Maximum intervals in years)

	PATROL		DETAILED		INTRUSIVE	
	Urban	Rural	Urban	Rural	Urban	Rural
Transformers						
Overhead	Patrol1	Patrol2	OHVI 5	OHVI 5		
Underground (Subsurface)	Patrol1	Patrol2	SS 3	SS 3		
Pad Mounted (live front)	Patrol1	Patrol2	AGI 5	AGI 5		
Pad Mounted (dead front)	Patrol1	Patrol2	AGE 5	AGE 5		
Switching/Protective Devices						
Overhead	Patrol1	Patrol2	OHVI 5	OHVI 5		
Underground (Subsurface)	Patrol1	Patrol2	SS 3	SS 3		
Pad Mounted (live front)	Patrol1	Patrol2	AGI 5	AGI 5		
Pad Mounted (dead front)	Patrol1	Patrol2	AGI 5	AGI 5		
Oil & Gas switches (above or below surface)	Patrol1	Patrol2	SW 3	SW 3		
Regulators/Capacitors						
Overhead	Patrol1	Patrol2	OHVI 5	OHVI 5		
Underground (Subsurface)	Patrol1	Patrol2	SS 3	SS 3		
Pad Mounted (live front)	Patrol1	Patrol2	AGI 5	AGI 5		
Pad Mounted (dead front)	Patrol1	Patrol2	AGE 5	AGE 5		
Overhead Conductors and Cables	Patrol1	Patrol2	OHVI 5	OHVI 5		
Streetlighting	Patrol1	Patrol2	x	x		
Wood Poles under 15 years	Patrol1	Patrol2	x	x	x	x
Wood Poles over 15 years which have not been subject to intrusive inspection	Patrol1	Patrol2	x	x	Wood Pole Intrusive 10	Wood Pole Intrusive 10
Wood Poles which passed intrusive inspection					Wood Pole Intrusive 20	Wood Pole Intrusive 20

Where the cycles are:

Patrol1	Patrol cycle- one-year
Patrol2	Patrol cycle- two year
OHVI 5	Overhead five-year detail inspection
AGE 5	Above Ground Deadfront external and internal five-year detail inspection
AGI 5	Above Ground Livefront external and internal five-year detail inspection
SS 3	Subsurface internal three-year detail inspection
SW 3	Switch internal three-year inspection
POLE 10	Wood pole intrusive ten-year inspection

PROGRAM CYCLE SUMMARY

Program Cycle	Cycle Interval	Start Year
Overhead Visual	5	1998
Above Ground Deadfront (AGE)	5	1998
Above Ground Livefront (AGI)	5	1998
Subsurface (SS3)	3	1998
Switches (SW3)	3	1998
Intrusive Wood Pole Insp. (POIN)	10	1998
Patrols Urban	1	1998
Patrol Rural	2	1998

EQUIPMENT DETAIL OVERHEAD
Overhead Distribution System:

Overhead Visual

Distribution Poles & Distribution Equipment	Inspection Program (in years)			
	Urban	Rural	Detailed	Intrusive
Pole	1	2	5	10, 20
Double Pole	1	2	5	10, 20
Pole Stub	1	2	5	10, 20
Crossarm	1	2	5	
Anchor/Guy	1	2	5	
Conductor	1	2	5	
Connector/Splice	1	2	5	
Transformer	1	2	5	
Switch	1	2	5	
Lightning Arrestor	1	2	5	
Fuse Holder	1	2	5	
Cutout	1	2	5	
Fixed Capacitor	1	2	5	
Switched Capacitor	1	2	5	
Riser	1	2	5	
Cable Terminal/Pothead	1	2	5	
Insulator	1	2	5	
Auto Throw Over	1	2	5	
Service Restorer	1	2	5	
Pole Hardware	1	2	5	

EQUIPMENT DETAIL ABOVE GROUND DEADFRONT (AGE)

Underground Distribution System:

Above Ground Deadfront (AGE)

UG Distribution Structure & Distribution Equipment	Inspection Program (in years)		
	Urban	Rural	External
Pad Structure - D Facility ID			
• Pad with no Equip.	1	2	5
• Pad with following Equip.	1	2	5
• 1 Phase Xfmr (Dead)	1	2	5
• 3 Phase Xfmr (Dead)	1	2	5
• Auto Throw Over	1	2	5
• Service Restorer	1	2	5
• Boost/Buck Station (Dead)	1	2	5
• Step Up/Dwn Station (Dead)	1	2	5
• Regulator (Dead)	1	2	5
Manhole - W or Y Facility ID			
• Manhole with following Equip.	1	2	5
• 1 Phase Xfmr (Dead)	1	2	5
• 3 Phase Xfmr (Dead)	1	2	5
Prim. HH - B or W Facility ID			
• Prim. HH with no Equip.	1	2	5
• Prim. HH w/following Equip.	1	2	5
• 1 Phase Xfmr (Dead)	1	2	5
• 3 Phase Xfmr (Dead)	1	2	5
• Auto Throw Over	1	2	5
Subsurface Encl.- S Facility ID			
• Subsurface Encl. w/no Equip.	1	2	5

EQUIPMENT DETAIL ABOVE GROUND LIVEFRONT (AGI)

Above Ground Livefront (AGI)

UG Distribution Structure & Distribution Equipment	Inspection Program (in years)		
	Urban	Rural	Internal
Pad Structure - D Facility ID			
• Pad with following Equip.	1	2	5
• Non-Oil/Gas Switch	1	2	5
• Non-Oil/Gas Group Switch	1	2	5
• 1 Phase Xfmr (Live)	1	2	5
• 3 Phase Xfmr (Live)	1	2	5
• Fixed Capacitor	1	2	5
• Switched Capacitor	1	2	5
• Fuse Cabinet	1	2	5
• Fused Switch Cabinet	1	2	5
• Terminator	1	2	5
• Boost/Buck Station (Live)	1	2	5
• Step Up/Dwn Station (Live)	1	2	5
• Regulator (Live)	1	2	5
Manhole - W or Y Facility ID			
• Manhole with following Equip.	1	2	5
• Non-Oil/Gas Switch	1	2	5
• Non-Oil/Gas Group Switch	1	2	5
• 1 Phase Xfmr (Live)	1	2	5
• 3 Phase Xfmr (Live)	1	2	5
• Fuse Cabinet	1	2	5
• Fused Switch Cabinet	1	2	5
• Terminator	1	2	5
Manhole - M Facility ID			
• Manhole with following Equip.	1	2	5
• Terminator	1	2	5
Prim. HH - B or W Facility ID			
• Prim. HH w/following Equip	1	2	5
• Non-Oil/Gas Switch	1	2	5
• Non-Oil/Gas Group Switch	1	2	5
• 1 Phase Xfmr (Live)	1	2	5
• 3 Phase Xfmr (Live)	1	2	5
• Fuse Cabinet	1	2	5

EQUIPMENT DETAIL ABOVE GROUND LIVEFRONT (AGI) (CONTINUED)

Above Ground Livefront (AGI) (Continued)

UG Distribution Structure & Distribution Equipment	Inspection Program (in years)		
	Urban	Rural	Internal
Prim. HH - B or W Facility ID			
• Fused Switch Cabinet	1	2	5
• Terminator	1	2	5
• Auto Throw Over	1	2	5
Enclosure - E Facility ID			
• Enclosure with following Equip.	1	2	5
• 1 Phase Xfmr (Dead or Live)	1	2	5
• 3 Phase Xfmr (Dead or Live)	1	2	5
• Terminator	1	2	5
• Cable Tap with AGI Equipment	1	2	5
• Step Up/Dwn Station	1	2	5

EQUIPMENT DETAIL SUBSURFACE 3

Subsurface 3

UG Distribution Structure & Distribution Equipment	Inspection Program (in years)		
	Urban	Rural	Internal
Manhole - M Facility ID			
Manhole with following Equip.	1	2	3
• Non-Oil/Gas Switch			3
• Non-Oil/Gas Group Switch			3
• 1 Phase Xfmr (Dead or Live)			3
• 3 Phase Xfmr (Dead or Live)			3
• Fuse Cabinet			3
• Auto Throw Over			3
• Cable Tap with SS3 equipment			3
Primary Handhole - H Facility ID			
Prim HH with following Equip.	1	2	3
• Non-Oil/Gas Switch			3
• Non-Oil/Gas Group Switch			3
• 1 Phase Xfmr (Dead or Live)			3
• 3 Phase Xfmr (Dead or Live)			3
• Terminator			3
• Step Up/Dwn Station			3
• Service Restorer			3
• Cable Tap with Subsurface 3 Equipment			3
Vault - U Vault – U Facility ID			
Vault with following Equip.	1	2	3
• Non-Oil/Gas Switch			3
• Non-Oil/Gas Group Switch			3
• 1 Phase Xfmr (Dead or Live)			3
• 3 Phase Xfmr (Dead or Live)			3
• Fixed Capacitor			3
• Switched Capacitor			3
• Fuse Cabinet			3
• Step Up/Dwn Station			3
• Auto Throw Over			3
Subsurface Encl.- S Facility ID			
Subsurf. Encl containing	1	2	3
• Non-Oil/Gas Switch			3
• Non-Oil/Gas Group Switch			3
• 1 Phase Xfmr (Dead or Live)			3
• 3 Phase Xfmr (Dead or Live)			3

EQUIPMENT DETAIL SUBSURFACE 10

Subsurface 10

UG Distribution Structure & Distribution Equipment	Inspection Program (in years)		
	Urban	Rural	Internal
Manhole - W or Y Facility ID			
Manhole with no Equipment	1	2	10
Manhole - M Facility ID			
• Manhole with no Equip.	1	2	10
• Manhole with following Equip.	1	2	10
• Cable Tap with no Equipment			10
Primary Handhole - H Facility ID			
• Prim. HH with following Equip.	1	2	10
• Cable Tap with no Equipment			10
Vault - U Facility ID			
• Vault with following Equip.	1	2	10
• Cable Tap with no Equipment			10
Subsurface Encl.- S Facility ID			
• Subsurf. Encl w/following Equip.	1	2	10
• Cable Tap with no Equipment			10

EQUIPMENT DETAIL OIL & GAS SWITCHES

Oil and Gas Switches

UG Distribution Structure & Distribution Equipment	Inspection Program (in years)		
	Urban	Rural	Switch
Manhole - W or Y Facility ID			
Manhole with following Equip	1	2	3
• Oil/Gas Switch	1	2	3
• Oil/Gas Group Switch	1	2	3
Manhole - M Facility ID			
Manhole with following Equip	1	2	3
• Oil/Gas Switch			3
• Oil/Gas Group Switch			3
Prim. HH - B or W Facility ID			
Prim HH with following Equip	1	2	3
• Oil/Gas Switch	1	2	3
• Oil/Gas Group Switch	1	2	3
Primary Handhole - H Facility ID			
Prim. HH with following Equip.	1	2	3
• Oil/Gas Switch			3
• Oil/Gas Group Switch			3
Vault - U Facility ID			
Vault with following Equip.	1	2	3
• Oil/Gas Switch			3
• Oil/Gas Group Switch			3
Subsurface Encl.- S Facility ID			
Subsurf. Encl w/following Equip.	1	2	3
• Oil/Gas Switch			3
• Oil/Gas Group Switch			3

ATTACHMENT A

2007

CORRECTIVE MAINTENANCE

SCHEDULE

District	Inspection type	Inspections Due in 2007
Beach Cities	AGE	1,677
	AGI	736
	OHVI	4,279
	SS3	102
	SWI	165
Metro	AGE	1,598
	AGI	630
	OHVI	7,393
	SS3	190
	SWI	180
Eastern	AGE	1,711
	AGI	291
	OHVI	11,235
	SS3	13
	SWI	37
North Coast	AGE	2,719
	AGI	552
	OHVI	4,365
	SS3	29
	SWI	92
North East	AGE	3,723
	AGI	400
	OHVI	11,489
	SS3	2
	SWI	116
Orange County	AGE	1,715
	AGI	301
	OHVI	966
	SS3	138
	SWI	66

56,910

APPENDIX A

SDG&E THIRD PARTY

INFRACTION

PROCESS

Third Party Infraction Process

Infractions caused by "Third Parties" are an ongoing issue that SDG&E has dealt with since the implementation of General Order 165. On a daily basis, Overhead and Underground Inspectors encounter GO 95 and 128 infractions caused by telecommunications companies or private property owners, who do not understand the implications of these codes. For example, a large number of private property owners try to make underground pad-mounted equipment more aesthetically pleasing by building retaining walls and locating vegetation in front of pad-mounted equipment. Many of these customers do not understand that their attempts to cover up equipment violates the workspace that General Order 128 requires SDG&E to maintain and may also make the equipment inaccessible for line personnel to work on and for inspectors to inspect.

Once SDG&E is aware of such violations, action is taken even though SDG&E did not cause the problem. SDG&E has developed the "Investigation Order System" that gives notification to the violating third parties and attempts to bring about resolution of these types of infractions.

The Process involves:

1. The Inspector, upon a detailed inspection, observes and records the violation in the Mobile Data Terminal (MDT). This information is uploaded into SDG&E's "Distribution Inspection & Maintenance System" (DIMS) where it is officially recorded and tracked.

2. The Inspector records the structure identification number and the address/location.

3. The type of violation/infraction is recorded.

4. A digital picture of the infraction is taken.

5. The Inspector forwards the information to SDG&E's Electric Distribution Compliance Management Group (CMG).

6. CMG examines all information .The infraction is given a tracking number and recorded in the "Investigation Order Database".

7. CMG then attaches the "General Order 95/128 Infraction Form" requesting that the infraction be resolved in 90 days. Private property issues are forwarded to SDG&E's Land Department for resolution. Infractions caused by telecommunication companies and others are forwarded directly to the company causing the infraction.

In 2006, the Corrective Maintenance Program's "Investigation Order System" processed 2,402 "Third Party" Investigation Orders. Of the 2,402 orders, 1,542 were resolved. In 2005, 3,176 "Third Party" infractions were processed and the violating parties fixed 925 of these.

SDG&E strives to be proactive in reducing the amount of "Third Party" infractions. On pad-mounted equipment, SDG&E has developed a sign similar to the "High Voltage" warning sign that shows the workspace dimensions needed for pad-mounted equipment. This sign is attached on the equipment in a position that is highly visible.

In addition to the workspace dimension alert sign, in 2004, SDG&E initiated programs with the telecommunication companies in its service territory to develop a more common and comprehensive understanding of what is required when constructing and maintaining infrastructure in accordance with General Orders 95 and 128. These programs have proven to be very beneficial for all parties, considering the fact that a large number of electric and communication equipment occupy jointly used overhead poles and underground trenches.

By educating its customers and companies that build their infrastructure in close proximity to electric facilities, SDG&E has reduced the number of "Third Party" violations of General Orders 95 and 128 found during the General Order 165 Detailed Inspection cycles as noted above. This education reduces the number of infractions and improves the level of safety for the public, all utility workers and reliability of the system.