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June 30, 2008

REG-10-12  
R.96-11-004

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

**Re: Electric Distribution Standards Proceeding - SDG&E's General Order 165 –  
2007 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.

Questions about this report should be directed to me at (858) 654-1779

Sincerely,

A handwritten signature in black ink, appearing to read 'Billie Overturf', is written over a large, stylized circular flourish. Below the signature, the name and title are printed.

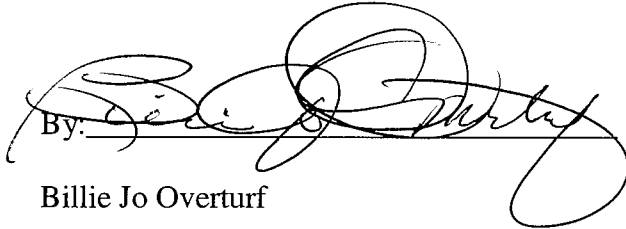
Billie Overturf  
Regulatory Information Manager

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

CERTIFICATE OF SERVICE

I hereby certify that pursuant to the Commission's Rules of Practice and Procedure, I have served a true copy of San Diego Gas & Electric Company's General Order 165 Corrective Maintenance Program Report for 2007 to all parties identified in the service list in R.96-11-004. Service was affected either electronically or by placing copies in properly addressed sealed envelopes depositing such envelopes in the United States Mail with first-class postage prepaid.

Executed this 30<sup>th</sup> day of June 2008 at San Diego, California.

By:   
Billie Jo Overturf

OFFICER VERIFICATION

I, Caroline Winn, declare the following:

I am an officer of San Diego Gas & Electric Company and am authorized to make this verification on its behalf. I am informed and believe that the matters stated in the foregoing 2007 General Order 165 Report are true to my own knowledge, except as to matters which are therein stated on information and belief, and as to those matters I believe them to be true.

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

Executed this 27<sup>th</sup> day of June, 2008, at San Diego, California.

A handwritten signature in black ink, appearing to read 'Caroline Winn', written in a cursive style.

Caroline Winn

Director - Transmission & Distribution Asset Management

San Diego Gas & Electric Company

**SAN DIEGO GAS & ELECTRIC COMPANY**

**CORRECTIVE MAINTENANCE PROGRAM**

**REPORT FOR**

**2007**

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, 2007 through December 31, 2007.

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 organizations. 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 Distribution Inspection Maintenance System (DIMS) 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 2007 Year-end Report**

In a letter dated November 9, 2007 to Paul Clanon, Executive Director, California Public Utilities Commission, SDG&E requested temporary relief from the inspection and repair requirements of its General Order 165 program (see Appendix A). This request was due to the extensive damage caused by the October/November 2007 firestorm. In the months following the firestorm, SDG&E dedicated the majority of its resources toward the restoration of power to its customers and to repairing fire damage to its electric distribution and transmission systems. As noted in the November 9 letter, this event greatly impacted SDG&E's ability to perform its normal GO 165 functions of inspection and repair work and therefore, SDG&E could not fully complete the required cycle of patrols, inspections, and follow-up correction maintenance work within the normal timeframe. SDG&E proposed resuming its maintenance program by May 1, 2008, and noted that it expected to complete the backlog of repair

work and be in full compliance with inspection cycles by December 2009. In a letter dated December 11, 2007, Paul Clanon approved SDG&E's request (see Appendix B).

SDG&E began transitioning toward more normal maintenance operations during the first quarter of 2008 and fully expects to be in full compliance with its regular GO 165 corrective maintenance program by December 2009. It should be noted that up until the firestorm, SDG&E was on schedule to complete the forecasted GO 165 Inspections for 2007. SDG&E had completed 99.4 % of the Urban Patrol Cycle, 99.2% of the Rural Patrol Cycle, and 99.5% of all Detailed Inspection Cycle requirements for 2007.

SDG&E continues to have the goal of correcting infractions found during GO165 inspections within a 12-month time-frame, from the 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 owners, environmental and other utilities' issues may require more time to resolve. 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 C. Facilities that are considered for and granted deferral status must meet strict internal requirements.

To ensure compliance with GO 165 inspection requirements and SDG&E's 12-month (date of inspection) time-frame 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.

**SDG&E GENERAL ORDER 165**

**MAINTENANCE**

**2007 REPORT**

# CPUC 2007 Yearend Report

<i>District</i>	<i>Inspect Type</i>	<i>Total Structures</i>	<i>Total Structures Scheduled</i>	<i>Percent Structures Scheduled</i>	<i>Total Structures Inspected</i>	<i>Percent Scheduled Inspected</i>	<i>Inspected in 2006 cleared in 2007</i>	<i>Inspected in 2007, cleared in 2007</i>	<i>Inspected in 2007, pending</i>
<i>Beach Cities</i>									
	AGE	12,652	2,045	16.16%	2,045	100.00%	59	1,759	11
	AGI	4,695	917	19.53%	917	100.00%	45	784	12
	OHVI	22,386	4,444	19.85%	4,444	100.00%	1,298	2,937	960
	POIN	19,144	49	0.26%	49	100.00%	3	0	2
	SS3	270	103	38.15%	103	100.00%	1	82	4
	SWI	472	159	33.69%	159	100.00%	7	116	21
<i>Eastern</i>									
	AGE	10,721	2,066	19.27%	2,066	100.00%	107	1,216	78
	AGI	2,813	409	14.54%	409	100.00%	34	200	11
	OHVI	58,759	11,929	20.30%	11,929	100.00%	4,010	2,842	2,075
	POIN	51,307	910	1.77%	910	100.00%	544	663	1
	SS3	35	11	31.43%	11	100.00%	3	3	4
	SWI	124	36	29.03%	36	100.00%	2	17	4
<i>Metro</i>									
	AGE	13,054	2,189	16.77%	2,188	99.95%	156	1,760	332
	AGI	3,701	789	21.32%	789	100.00%	60	602	50
	OHVI	42,672	7,844	18.38%	7,844	100.00%	2,799	2,698	1,671
	POIN	37,879	181	0.48%	181	100.00%	87	36	3
	SS3	519	205	39.50%	205	100.00%	8	118	12
	SWI	436	180	41.28%	180	100.00%	6	114	30
<i>North Coast</i>									
	AGE	19,784	3,827	19.34%	3,827	100.00%	382	3,339	904
	AGI	3,742	722	19.29%	722	100.00%	117	514	194
	OHVI	23,732	4,570	19.26%	4,570	100.00%	1,410	2,532	1,003
	POIN	21,869	17,327	79.23%	17,327	100.00%	96	18,522	552
	SS3	73	30	41.10%	30	100.00%	4	28	10
	SWI	243	88	36.21%	88	100.00%	1	84	21
<i>Northeast</i>									
	AGE	22,198	4,926	22.19%	4,917	99.82%	90	4,001	225
	AGI	4,786	867	18.12%	846	97.58%	86	538	72
	OHVI	63,974	12,458	19.47%	12,455	99.98%	1,921	3,744	3,415
	POIN	60,381	704	1.17%	704	100.00%	36	341	9
	SS3	4	2	50.00%	2	100.00%	0	1	0
	SWI	234	112	47.86%	110	98.21%	2	105	8
<i>Orange County</i>									
	AGE	10,727	2,007	18.71%	2,007	100.00%	95	1,834	639
	AGI	2,065	397	19.23%	397	100.00%	17	322	113
	OHVI	5,586	1,039	18.60%	1,039	100.00%	143	503	94
	POIN	5,004	3,304	66.03%	3,304	100.00%	0	3,305	302
	SS3	215	138	64.19%	138	100.00%	0	118	0
	SWI	144	67	46.53%	67	100.00%	0	63	29



## **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 2008 are included as Appendix D, 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's CMP cycles are designed to match GO 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 Above Ground Dead-front (AGE) and Above Ground Live-front (AGI) detailed external and internal inspections of dead-front and live-front pad-mounted facilities to identify conditions out of compliance with GO 128.

- AGE (5- year)

This cycle consists of a detailed external and internal inspection of dead-front pad-mounted facilities to identify conditions out of compliance with GO128. This is a five-year inspection cycle. Originally, the AGE cycle 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 dead-front equipment data from live-front equipment data.

- AGI (5- year)

This cycle consists of a detailed external and internal inspection of live-front 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 hand-holes 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, hand-holes 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 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 GO 128 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 (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 (GO 165 defined “urban” as those areas with 1000 persons or more per square mile). GO 165 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 facility in rural areas. Under agreement of interpretation with the CPUC, “rural” is defined as unincorporated areas (GO 165 defined “rural” as those areas with less than 1000 persons per square mile). GO 165 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

**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 Dead-front (AGE)**

UG Distribution Structure & Distribution Equipment	Inspection Program (in years)		
	Urban	Rural	External
<b>Pad Structure - D Facility ID</b>			
• 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
<b>Manhole - W or Y Facility ID</b>			
• Manhole with following Equip.	1	2	5
• 1 Phase Xfmr (Dead)	1	2	5
• 3 Phase Xfmr (Dead)	1	2	5
<b>Prim. HH - B or W Facility ID</b>			
• 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
<b>Subsurface Encl.- S Facility ID</b>			
• Subsurface Encl. w/no Equip.	1	2	5

**EQUIPMENT DETAIL ABOVE GROUND LIVEFRONT (AGI)**  
**Underground Distribution System:**  
**Above Ground Live-front (AGI)**

UG Distribution Structure & Distribution Equipment	Inspection Program (in years)		
	Urban	Rural	Internal
<b>Pad Structure - D Facility ID</b>			
• 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
<b>Manhole - W or Y Facility ID</b>			
• 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
<b>Manhole - M Facility ID</b>			
• Manhole with following Equip.	1	2	5
• Terminator	1	2	5
<b>Prim. HH - B or W Facility ID</b>			
• 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)**  
**Underground Distribution System:**  
**Above Ground Live-front (AGI) (Cont.)**

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**

**Underground Distribution System:**

**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			
Subsurface. Encl containing	1	2	3
• Non-Oil/Gas Switch			3

UG Distribution Structure& Distribution Equipment	Inspection Program		(in years)
	Urban	Rural	Internal
<ul style="list-style-type: none"> <li>• Non-Oil/Gas Group Switch</li> </ul>			3
<ul style="list-style-type: none"> <li>• 1 Phase Xfmr (Dead or Live)</li> </ul>			3
<ul style="list-style-type: none"> <li>• 3 Phase Xfmr (Dead or Live)</li> </ul>			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

## **APPENDIX A**

### **SDG&E'S General Order 165 Relief Request Letter**





Lee Schavrien  
Senior Vice President  
Regulatory Affairs  
8330 Century Park Court, CP33C  
San Diego, CA 92123-1630  
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LSchavrien@SempraUtilities.com

November 9, 2007

Paul Clanon  
Executive Director  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

Re: SDG&E's Request For Temporary Relief From Requirements of General Order 165

Dear Mr. Clanon:

During the week of October 22, 2007, large portions of San Diego County were devastated by wild fires that destroyed thousands of acres of land, homes and structures. SDG&E's transmission and electric distribution system sustained a substantial amount of damage and tens of thousands of customers experienced power outages. Our crews, with the assistance of mutual aid and contract crews, have been working diligently to repair and rebuild our system, which will enable SDG&E to restore power to all of its customers.

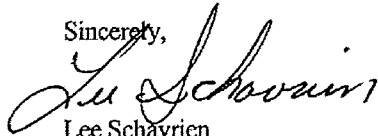
SDG&E has committed all its construction resources toward the repairing, rebuilding and restoration process. This includes inspectors and repair crews that normally would be used in SDG&E's General Order 165 Corrective Maintenance Program. SDG&E anticipates that it will need to dedicate its Corrective Maintenance personnel to the restoration process for the next three to four months. Accordingly, SDG&E is requesting relief from the inspection and repair requirements of General Order 165 for up to six months.<sup>1</sup> Our 2007 report will reflect our corrective maintenance compliance up until November of 2007. Such relief will allow SDG&E to concentrate on repairing, rebuilding and restoring its fire-damaged system.

SDG&E proposes to resume General Order 165 inspections on May 1, 2008, and expects to complete the backlog of repair work and be in full compliance with the inspection cycles by December 2009. This timeframe will allow SDG&E to comply with General Order 165 in a cost efficient manner. Attempting to catch up in less time would result in significant increases in labor costs.

Prior to the 2007 Firestorm, SDG&E was in complete compliance with the inspection cycles of General Order 165. The same was true prior to the 2003 Firestorm.

Should you have any questions, please contact Howard Levin at (858) 637-3724.

Sincerely,



Lee Schavrien  
Senior Vice President – Regulatory Affairs

cc: Richard Clark, Director - CPSD  
Sean Gallagher, Director - Energy Division  
Brian Schumacher, Supervisor - Energy Division  
Raffy Stepanian, Branch Chief - CPSD  
Mark Ziering, CPSD  
Caroline Winn, Director - SDG&E

<sup>1</sup> On November 13, 2003, following the 2003 Firestorm, SDG&E issued a similar request for relief from the requirements of General Order 165 that was subsequently approved by the CPUC.

## **APPENDIX B**

### **CPUC Approval Letter**

STATE OF CALIFORNIA  
PUBLIC UTILITIES COMMISSION  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298

ARNOLD SCHWARZENEGGER, Governor



December 11, 2007

Lee Schavrien  
Senior Vice President – Regulatory Affairs  
San Diego Gas and Electric Company  
8330 Century Park Court  
San Diego, CA 92123-1650

**Re: SDG&E's Request for Temporary Relief from  
Requirements of General Order 165**

Dear Mr. Schavrien,

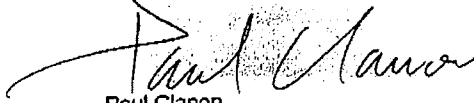
In a November 9, 2007 letter, San Diego Gas and Electric Company (SDG&E) requests a temporary relief from the inspection and repair requirements of General Order (GO) 165 for up to six months.<sup>1</sup> During the week of October 22, 2007, large portions of San Diego County were devastated by wildfires. SDG&E's transmission and electric distribution system sustained a substantial amount of damage. Subsequently, SDG&E states that it has committed all of its construction resources toward the repairing, rebuilding, and restoration process. This includes inspectors and repair crews that normally would be used in SDG&E's GO 165 Corrective Maintenance Program.

SDG&E also states that it anticipates that it will need to dedicate its Corrective Maintenance personnel to the restoration process for the next three to four months. SDG&E's GO 165 2007 report will reflect its corrective maintenance compliance up until November of 2007. SDG&E states that such relief will allow it to concentrate on repairing, rebuilding, and restoring its fire-damaged system. This will presumably ensure a safer and more reliable electric system than if this was not completed in an expedient manner. SDG&E proposes to resume GO 165 inspections on May 1, 2008, and expects to complete the backlog of repair work and be in full compliance with the inspection cycles by December 2009. SDG&E states that this timeframe will allow it to comply with GO 165 in a cost efficient manner, balance its use of resources, and not drive up future costs.

<sup>1</sup> On November 13, 2003, following the 2003 Firesform, SDG&E issued a similar request for relief from the requirements of GO 165 that was subsequently approved by the CPUC.

For good cause shown, I grant SDG&E temporary relief from the requirements of GO 165. If you have any questions concerning this matter, please contact Brian Schumacher of the CPUC's Energy Division staff at 415-703-1226 (bds@cpuc.ca.gov).

Sincerely,



Paul Clanon  
Executive Director,  
California Public Utilities Commission

cc: Richard Clark, Director - CPSD  
Sean Gallagher, Director - Energy Division  
Brian Schumacher, Supervisor - Energy Division  
Raffy Stepanian - Branch Chief - CPSD  
Mark Ziering, CPSD  
Caroline Winn, Director - SDG&E

307334

TOTAL P.03

# **APPENDIX C**

## **SDG&E THIRD PARTY**

### **INFRACTION**

### **PROCESS**

## **Third Party Infraction Process**

Third Party (e.g. telecommunications companies, cable television companies, and private property owners) infractions are an ongoing issue that SDG&E has dealt with since the implementation of GO 165. Indeed, on a daily basis, Overhead and Underground Inspectors encounter GO 95 and 128 infractions caused by telecommunications companies, cable television companies, and/or private property owners. For example, on overhead poles, telecommunications companies will install communication service drops in the area designated/reserved by GO 95 as "Climbing Space". Also, a large number of private property owners try to make underground pad-mounted equipment more cosmetically aesthetic by surrounding them with retaining walls and/or locating vegetation in front of such pad-mounted equipment. Many of these customers do not understand that their attempts to cover up our equipment violates the GO 128 workspace rules and may also make the equipment inaccessible for operations, inspections and/or repairs.

Once SDG&E is aware of a GO violation caused by a Third Party, action is taken as soon as reasonably possible to notify the Third Party of its infraction. To accomplish such notice, SDG&E developed an Investigation Order System that gives notification to the violating Third Party and requires that the infraction be resolved within 90 days. Many Third Parties, however, are either unable or unwilling to resolve the infraction within the 90 day period. In such instances, SDG&E attempts to continue working with the Third Party so as to eventually achieve compliance. Since Third Parties are not subject to the same maintenances compliance and reporting standards imposed on SDG&E, it is often difficult to convince Third Parties that they cannot maintain their property in a manner that violates GO 95 or GO 128.

Moreover, since many of these infractions are caused by property owned by Third Parties (e.g. a misplaced retaining wall or equipment owned by the telecommunications or cable television

companies), SDG&E is unable to resolve the infraction without obtaining the cooperation of the offending Third Party. If the offending Third Party ignores SDG&E's notice or simply does not cooperate in resolving the issue, the infraction remains outstanding and may take well over 90 days to resolve. For example, in 2007, CMP's Investigation Order System processed 1,427 Third Party Investigation Orders. Of the 1,427 notices to Third Parties, 404 were resolved and the rest remain outstanding. In 2006, 3,176 Third Party infractions were processed. Of the 3,176 notices to Third Parties, 925 were resolved and the rest remain outstanding.

SDG&E strives to be proactive in reducing the amount of "Third Party" infractions. For example, on pad-mounted equipment, SDG&E has developed a "Workspace Dimension Tag" in addition to the "High Voltage" warning sign that shows the needed workspace for pad-mounted equipment. This sign is attached on the equipment in a position that is highly visible. Additionally, to develop a more common and comprehensive understanding of what is required when constructing and maintaining utility infrastructure in accordance with General Orders 95 and 128, SDG&E strives to maintain an open dialogue with telecommunication and cable television companies operating in our service territory

By educating our customers and working with other utilities that build their infrastructure in close proximity to our electric underground facilities or on jointly used overhead poles, SDG&E has reduced the number of Third Party GO 95 and 128 violations found during the GO 165 detailed inspection cycles. Thus, by implementing the Investigation Order System, SDG&E's vision is to reduce the number of Third Party infractions, which will also improve the level of safety for the public and utility workers and improve system reliability.



**APPENDIX D**

**SDG&E'S GENERAL ORDER 165**

**MAINTENANCE SCHEDULE**

**FOR 2008**

district	insp_typ	sub_typ	2008 Req Count
BC	AG	E	2,713
BC	AG	I	867
BC	OH	VI	4,623
BC	SS	3	95
BC	SW	I	171
CM	AG	E	2,318
CM	AG	I	682
CM	OH	VI	8,585
CM	SS	3	204
CM	SW	I	163
EA	AG	E	2,220
EA	AG	I	473
EA	OH	VI	11,208
EA	SS	3	12
EA	SW	I	47
NC	AG	E	3,444
NC	AG	I	636
NC	OH	VI	4,271
NC	SS	3	24
NC	SW	I	83
NE	AG	E	3,885
NE	AG	I	907
NE	OH	VI	12,897
NE	SS	3	0
NE	SW	I	64
OC	AG	E	2,047
OC	AG	I	362
OC	OH	VI	1,147
OC	SS	3	28
OC	SW	I	46

**64,222**