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8330 Century Park Court
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June 30, 2009

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

Brian Schumacher
Energy Division
California Public Utilities Commission
505 Van Ness Avenue,
San Francisco, CA 94102

**Re: Electric Distribution Standards Proceeding - SDG&E's General Order 165 –
2008 Annual Corrective Maintenance Report**

Dear Brian:

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 circular stamp or seal. The signature is fluid and cursive.

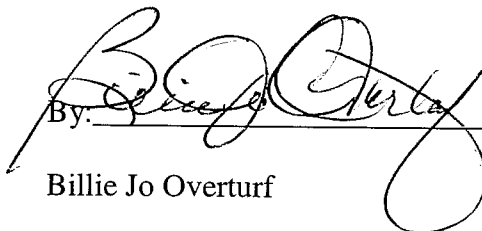
Billie Overturf
Regulatory Information Manager

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 2008 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 30th day of June 2009 at San Diego, California.

By:  _____
Billie Jo Overturf

SAN DIEGO GAS & ELECTRIC COMPANY

CORRECTIVE MAINTENANCE PROGRAM

REPORT FOR

2008

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, 2008 through December 31, 2008.

SDG&E's GO 165 compliance program is called the Corrective Maintenance Program (CMP) and is managed by SDG&E's Program Management Department. 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 are 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 2008 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. 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 expected to be in full compliance with its regular GO 165 corrective maintenance program by

December 2009. SDG&E is pleased to note that as of June 1, 2009, SDG&E has completed 100% of the Urban Patrol Cycle, 100% of the Rural Patrol Cycle, and 100% of all Detailed Inspection Cycle requirements for 2007 and 2008.

SDG&E continues to have the goal of correcting infractions found during GO165 inspections within a 12-month timeframe, 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. Pending infractions such as these are placed in the "Deferred" category and are tracked by SDG&E's Compliance Management Department, Vegetation Management, Land Management, and the Construction & Operation (C&O) Centers. 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 (from the month of inspection) time-frame to complete corrections and/or required maintenance, SDG&E has developed a centralized Quality Assurance Program. The program reviews inspections and repairs to verify that infractions are identified and corrected accurately.

SDG&E GENERAL ORDER 165

MAINTENANCE

2008 REPORT

CPUC 2008 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 2007 cleared in 2008</i>	<i>Inspected in 2008, cleared in 2008</i>	<i>Inspected in 2008, pending</i>
<i>Beach Cities</i>									
	AGE	12,796	3,250	25.40%	3,250	100.00%	14	3,106	17
	AGI	4,663	1,067	22.88%	1,067	100.00%	10	985	2
	OHVI	22,060	4,734	21.46%	4,734	100.00%	1,208	1,043	1,152
	POIN	22,650	58	0.26%	58	100.00%	2	0	0
	SS3	271	96	35.42%	96	100.00%	4	69	0
	SWI	454	159	35.02%	159	100.00%	5	149	20
<i>Eastern</i>									
	AGE	10,945	2,642	24.14%	2,642	100.00%	80	1,621	101
	AGI	2,847	746	26.20%	746	100.00%	11	453	53
	OHVI	58,731	11,919	20.29%	11,919	100.00%	3,125	2,681	4,763
	POIN	58,636	229	0.39%	229	100.00%	14	0	0
	SS3	33	13	39.39%	13	100.00%	1	5	1
	SWI	112	42	37.50%	42	100.00%	3	29	11
<i>Metro</i>									
	AGE	13,300	3,061	23.02%	3,061	100.00%	173	2,815	110
	AGI	3,725	968	25.99%	968	100.00%	34	841	60
	OHVI	42,578	8,816	20.71%	8,816	100.00%	2,111	3,898	3,285
	POIN	44,077	124	0.28%	124	100.00%	4	0	0
	SS3	527	261	49.53%	261	100.00%	23	145	20
	SWI	431	193	44.78%	193	100.00%	11	119	40
<i>North Coast</i>									
	AGE	20,098	4,320	21.49%	4,316	99.91%	542	3,849	1,266
	AGI	3,772	844	22.38%	844	100.00%	72	714	268
	OHVI	23,658	4,510	19.06%	4,510	100.00%	1,314	2,737	1,666
	POIN	24,204	850	3.51%	850	100.00%	561	48	29
	SS3	72	25	34.72%	25	100.00%	14	23	6
	SWI	232	81	34.91%	81	100.00%	3	78	44
<i>Northeast</i>									
	AGE	22,493	4,677	20.79%	4,677	100.00%	92	4,067	403
	AGI	4,838	1,001	20.69%	1,001	100.00%	16	810	234
	OHVI	63,996	13,511	21.11%	13,511	100.00%	2,984	3,784	4,986
	POIN	63,922	11,370	17.79%	11,370	100.00%	9	14	478
	SS3	4					0	0	0
	SWI	226	66	29.20%	66	100.00%	6	54	21
<i>Orange County</i>									
	AGE	10,863	2,341	21.55%	2,341	100.00%	102	1,979	348
	AGI	2,094	434	20.73%	434	100.00%	12	338	107
	OHVI	5,642	1,273	22.56%	1,273	100.00%	70	530	192
	POIN	5,698	873	15.32%	873	100.00%	283	129	58
	SS3	215	32	14.88%	32	100.00%	0	17	1
	SWI	137	43	31.39%	43	100.00%	0	22	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 2009 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 historically were determined by the system-wide counts of facilities in each inspection type, divided by the number of years in the cycle length. This practice created inspection cycles which is the current practice of setting CMP goals for the year; goals determined by the last inspection date. SDG&E's CMP cycles are designed to exceed or adhere to 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 (Above Ground Dead-front, 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 (Above Ground Live-front, 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 or Gas Switch, 3-year)

This is a three-year cycle that consists of a specialized inspection of all subsurface and pad-mounted oil and gas switches. 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 wood pole integrity inspections are currently performed by a SDG&E contractor who also applies wood preservative treatments and installs mechanical reinforcements (C-truss). 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 based on the remaining shell thickness for

various lengths of pole. If a pole does not have sufficient shell thickness for C-truss, 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.” When Patrols have been completed, any identified structural problems and hazards are 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.” When Patrols have been completed, any identified structural problems and hazards are 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; Oil & Gas (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)			
	Patrol		Detailed	Intrusive
	Urban	Rural		
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	Patrol Rural	Detailed
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)
Underground Distribution System
Above Ground Live-front (AGI)

UG Distribution Structure & Distribution Equipment	Inspection Program (in years)		
	Urban	Patrol Rural	Detailed
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)
Underground Distribution System
Above Ground Live-front (AGI) (Cont.)

UG Distribution Structure & Distribution Equipment	Inspection Program (in years)		
	Urban	Patrol Rural	Detailed
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	Patrol Rural	Detailed
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 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
• Non-Oil/Gas Group Switch			3
• 1 Phase Xfmr (Dead or Live)			3
• 3 Phase Xfmr (Dead or Live)			3

EQUIPMENT DETAIL SUBSURFACE 10
Underground Distribution System
Subsurface 10

UG Distribution Structure & Distribution Equipment	Inspection Program (in years)		
	Urban	Patrol Rural	Detailed
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
Underground Distribution System
Oil and Gas Switches

UG Distribution Structure & Distribution Equipment	Inspection Program (in years)		
	Urban	Patrol Rural	Detailed
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
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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.

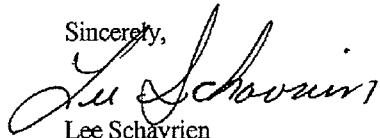
SDG&E has committed all its construction resources toward the repairing, rebuilding and restoration process. This includes inspectors and repair crews that normally would be used in SDG&E's General Order 165 Corrective Maintenance Program. SDG&E anticipates that it will need to dedicate its Corrective 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.¹ 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

¹ 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

ARNOLD SCHWARZENEGGER, Governor

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

December 11, 2007

Lee Schavrien
Senior Vice President – Regulatory Affairs
San Diego Gas and Electric Company
8330 Century Park Court
San Diego, CA 92123-1550

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

Dear Mr. Schavrien,

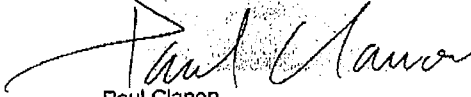
In a November 9, 2007 letter, San Diego Gas and Electric Company (SDG&E) requests a temporary relief from the inspection and repair requirements of General Order (GO) 165 for up to six months.¹ During the week of October 22, 2007, large portions of San Diego County were devastated by wildfires. SDG&E's 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.

¹ 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 violate 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 a Request for Correction of General Order Procedure 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 maintenance 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 2008, CMP's Investigation Order System processed 2,136 Third Party Investigation Orders.

Of the 2,136 notices to Third Parties, only 18 were resolved and the remaining 2,118 (99%) of these infractions remain outstanding as of June 1, 2009. 94% of the 2,136 notices issued were for Communication Infrastructure Providers, with only 6% issued to private property owners. Eight of the 18 resolved Third Party notices were resolved by private property owners. In 2007, 1,426 Third Party infractions notices were issued and as of June 1, 2009, 149 were resolved. Only 11% of the 149 resolved infractions were corrected by Communication Infrastructure Providers. 90% of the 2007 issued notices to Third Parties remain unresolved. This shows the large amount of issues still pending with Communication Infrastructure Providers.

By attempting to educate 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 strives to reduce the number of Third Party GO 95 and 128 violations found during the GO 165 detailed inspection cycles. Thus, by implementing the Request for Correction of General Order Procedure, SDG&E's vision is to reduce the number of Third Party infractions over time, which will also improve the level of safety for the public and utility workers, as well as improve system reliability.

APPENDIX D

SDG&E'S GENERAL ORDER 165

MAINTENANCE SCHEDULE

FOR 2009

District	Inspection Type	2009 Inspections Required
Beach Cities	AGE	2,593
	AGI	909
	OHVI	3,752
	SS3	71
	SWI	140
Metro	AGE	2,923
	AGI	617
	OHVI	8,547
	SS3	84
	SWI	76
Eastern	AGE	2,407
	AGI	535
	OHVI	11,622
	SS3	8
	SWI	41
North Coast	AGE	4,543
	AGI	693
	OHVI	4,717
	SS3	19
	SWI	69
Northeast	AGE	4,803
	AGI	900
	OHVI	12,928
	SS3	2
	SWI	54
Orange County	AGE	2,566
	AGI	453
	OHVI	1,093
	SS3	49
	SWI	29
	<u>Division Total:</u>	<u>67,243</u>

OFFICER VERIFICATION

I, Lee Schavrien, declare the following:

I am an Officer of San Diego Gas & Electric and am authorized to make this verification on its behalf. I am informed and believe that the matters stated in the foregoing 2008 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 29th day of June, 2009, in San Diego, California.



Lee Schavrien

Senior Vice President of Regulatory & Finance

San Diego Gas & Electric Company