



GENERAL ORDER 165
CORRECTIVE MAINTENANCE PROGRAM

REPORT FOR

2010

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, 2010 through December 31, 2010.

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 is completed. Since the implementation of the CMP, SDG&E has used the Distribution Inspection Maintenance System (DIMS) electronic database to schedule, record and track all inspections and repair work required under GO 165. During 2010, SDG&E converted to a new system to record and track inspection and maintenance activities. SDG&E is now using SAP to manage and record GO 165 inspections and repair work.

Summary of the 2010 Year-end Report

SDG&E's goal is to correct infractions found during GO 165 inspections within 12-months 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, based upon the severity of the infraction. 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. Infractions such as these, which are nearing their 12 month due date, are considered for "Deferred" category and are tracked by SDG&E's Compliance Management Department, Vegetation Management, Land Management, and the Construction & Operation (C&O) Centers. Facilities that are considered for and granted "Deferred" status must meet strict internal requirements.

During the phasing in of the new SAP system, scheduled inspections for a small number of facilities, a total of 27 (0.03%) of the 91,162 grand total of facilities scheduled for inspection, were not accomplished during 2010. Once SDG&E recognized the discrepancy between the two systems, these facilities were inspected. All 27 inspections have been completed as of June 16, 2011. Using the new system, SDG&E still produces monthly status reports tracking the progress of inspections and repair work.

SDG&E GENERAL ORDER 165

MAINTENANCE

2010 REPORT

District	Inspection Type	Total Structures	Total Structures Scheduled for inspection in 2010	Percent Structures Scheduled for Inspection in 2010	Total Structures Inspected in 2010	Percent Scheduled and Inspected in 2010	Structures Inspected in 2009, Cleared in 2010	Structures Inspected in 2010, Cleared in 2010	Structures Inspected in 2010, Pending
Beach Cities	AGE	13,155	2,536	19.28%	2,536	100.00%	2	2,425	5
	AGI	4,574	819	17.91%	819	100.00%	3	795	0
	OHVI	21,917	4,687	21.39%	4,686	99.98%	806	2,978	1,701
	POIN	22,244	33	0.15%	33	100.00%	9	23	1
	SS3	271	103	38.01%	103	100.00%	1	103	0
	SWI	421	142	33.73%	142	100.00%	1	141	0
Metro	AGE	13,698	2,546	18.59%	2,546	100.00%	238	2,432	11
	AGI	3,651	679	18.60%	679	100.00%	37	632	10
	OHVI	42,209	9,140	21.65%	9,139	99.99%	3,434	7,270	1,818
	POIN	43,661	94	0.22%	94	100.00%	12	24	2
	SS3	538	191	35.50%	191	100.00%	6	178	8
	SWI	419	157	37.47%	157	100.00%	3	155	1
Eastern	AGE	11,301	2,174	19.24%	2,174	100.00%	238	2,050	10
	AGI	2,779	482	17.34%	482	100.00%	32	437	4
	OHVI	58,598	13,770	23.50%	13,770	100.00%	3,043	9,543	4,153
	POIN	58,588	1,986	3.39%	1,986	100.00%	6	1,720	240
	SS3	32	9	28.13%	9	100.00%	1	8	1
	SWI	100	31	31.00%	31	100.00%	0	31	0
North Coast	AGE	20,590	4,412	21.43%	4,411	99.98%	358	3,966	253
	AGI	3,765	930	24.70%	926	99.57%	99	802	62
	OHVI	23,634	5,376	22.75%	5,364	99.78%	1,843	3,622	1,689
	POIN	24,083	155	0.64%	155	100.00%	2	92	6
	SS3	73	29	39.73%	29	100.00%	2	28	0
	SWI	227	82	36.12%	82	100.00%	22	75	7
Northeast	AGE	22,977	4,927	21.44%	4,925	99.96%	285	4,451	341
	AGI	4,812	955	19.85%	955	100.00%	39	802	77
	OHVI	63,976	13,165	20.58%	13,159	99.95%	3,166	10,795	2,300
	POIN	64,466	17,529	27.19%	17,529	100.00%	879	15,635	1,847
	SS3	7	3	42.86%	3	100.00%	0	3	0
	SWI	207	100	48.31%	100	100.00%	1	99	0
Orange County	AGE	11,032	2,095	18.99%	2,095	100.00%	214	2,020	47
	AGI	2,027	373	18.40%	373	100.00%	21	341	12
	OHVI	5,668	1,216	21.45%	1,216	100.00%	155	1,044	167
	POIN	5,728	38	0.66%	38	100.00%	0	30	3
	SS3	215	135	62.79%	135	100.00%	0	135	0
	SWI	124	63	50.81%	63	100.00%	2	58	5

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 2011 are included as Appendix A, in accordance with GO 165. Equipment inspections are divided into categories of equipment type and subdivided by district. 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 have been 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 setting the CMP goals for the year. The goals for the year are 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 that are out of compliance with GO 95. 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 that are 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 GO 128. 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 GO 128. 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 only cable taps, splices or pass-throughs are excluded as they are not required by GO 165. The SS3 cycle consists of a detailed inspection of these facilities to identify conditions out of compliance with GO 128. This is a three-year inspection cycle.

SWITCH

- SWI (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/SAP. 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/SAP. The status of "Do Not Operate Energized" (DOE) switches for prioritizing replacements are also tracked in DIMS/SAP. 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 GO 165, 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 applicable 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/SAP.

PATROL, RURAL

- Patrol 2¹ (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 applicable 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.” Consistent with D. 09-08-029, SDG&E now conducts annual patrol inspections in rural areas which are included in SDG&E’s Fire Threat Zone. When Patrols have been completed, any identified structural problems and hazards are recorded in DIMS/SAP.

¹ Commission Decision D. 09-08-029 in R. 08-11-005 amended GO 165 Section IV to increase the frequency for Patrol Inspections in rural areas determined to be within extreme and very high fire threat zones in Southern California to once per year. The basis for this determination is the California Department of Forestry and Fire Protection’s Fire and Resource Assessment Program (FRAP) Fire Threat Map. However, the boundaries of the map were to be broadly construed and Utilities were encouraged to apply their expertise and judgment to determine if local conditions required adjustments to the boundaries of the map. Based on D. 09-08-029, SDG&E has developed the SDG&E Fire Threat Zone Map and has implemented annual Patrol Inspections in the SDG&E Fire Threat Zone at the start of 2010.

SDG&E CMP INSPECTION CYCLES

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		
Street Lighting	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

*Patrol inspections conducted once per year within SDG&E's Fire Threat Zone as described in footnote 1, page 10.

PROGRAM CYCLE SUMMARY

Program Cycle	Cycle Interval	Start Year
Overhead Visual (OHVI)	5	1998
Above Ground Dead-front (AGE)	5	1998
Above Ground Live-front (AGI)	5	1998
Subsurface (SS3)	3	1998
Switches; Oil & Gas (SWI)	3	1998
Intrusive Wood Pole Insp. (POIN)	10	1998
Patrols Urban	1	1998
Patrols Rural*	2	1998

*Patrol inspections conducted once per year within SDG&E's Fire Threat Zone as described in footnote 1, page 10.

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
Cross-arm	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	

*Patrol inspections conducted once per year within SDG&E's Fire Threat Zone as described in footnote 1, page 10.

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 Equipment	1	2	5
Pad with following Equipment	1	2	5
• 1 Phase Transformer (Dead)	1	2	5
• 3 Phase Transformer (Dead)	1	2	5
• Auto Throw Over	1	2	5
• Service Restorer	1	2	5
• Boost/Buck Station (Dead)	1	2	5
• Step Up/Down Station (Dead)	1	2	5
• Regulator (Dead)	1	2	5
Manhole - W or Y Facility ID			
Manhole with following Equipment	1	2	5
• 1 Phase Transformer (Dead)	1	2	5
• 3 Phase Transformer (Dead)	1	2	5
Prim. HH - B or W Facility ID			
Prim. HH w/following Equipment	1	2	5
• 1 Phase Transformer (Dead)	1	2	5
• 3 Phase Transformer (Dead)	1	2	5
• Auto Throw Over	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 Equipment	1	2	5
• Non-Oil/Gas Switch	1	2	5
• Non-Oil/Gas Group Switch	1	2	5
• 1 Phase Transformer (Live)	1	2	5
• 3 Phase Transformer (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/Down Station (Live)	1	2	5
• Regulator (Live)	1	2	5
Manhole - W or Y Facility ID			
Manhole with following Equipment	1	2	5
• Non-Oil/Gas Switch	1	2	5
• Non-Oil/Gas Group Switch	1	2	5
• 1 Phase Transformer (Live)	1	2	5
• 3 Phase Transformer (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 Equipment	1	2	5
• Terminator	1	2	5
Prim. HH - B or W Facility ID			
Prim. HH w/following Equipment	1	2	5
• Non-Oil/Gas Switch	1	2	5
• Non-Oil/Gas Group Switch	1	2	5
• 1 Phase Transformer (Live)	1	2	5
• 3 Phase Transformer (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 Equipment	1	2	5
• 1 Phase Transformer (Dead or Live)	1	2	5
• 3 Phase Transformer (Dead or Live)	1	2	5
• Terminator	1	2	5
• Cable Tap with AGI Equipment	1	2	5
• Step Up/Down 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 Transformer (Dead or Live)			3
• 3 Phase Transformer (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 Transformer (Dead or Live)			3
• 3 Phase Transformer (Dead or Live)			3
• Terminator			3
• Step Up/Down 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 Transformer (Dead or Live)			3
• 3 Phase Transformer (Dead or Live)			3
• Fixed Capacitor			3
• Switched Capacitor			3
• Fuse Cabinet			3
• Step Up/Down 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 Transformer (Dead or Live)			3
• 3 Phase Transformer (Dead or Live)			3

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 Equipment	1	2	3
• Oil/Gas Switch	1	2	3
• Oil/Gas Group Switch	1	2	3
Manhole - M Facility ID			
Manhole with following Equipment	1	2	3
• Oil/Gas Switch			3
• Oil/Gas Group Switch			3
Prim. HH - B or W Facility ID			
Prim HH with following Equipment	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 Equipment	1	2	3
• Oil/Gas Switch			3
• Oil/Gas Group Switch			3
Vault - U Facility ID			
Vault with following Equipment	1	2	3
• Oil/Gas Switch			3
• Oil/Gas Group Switch			3
Subsurface Encl.- S Facility ID			
Subsurface Encl w/following Equipment	1	2	3
• Oil/Gas Switch			3
• Oil/Gas Group Switch			3

APPENDIX A

SDG&E'S GENERAL ORDER 165

MAINTENANCE SCHEDULE

FOR 2011

District	Inspection Cycle	2011 Inspections Required
Beach Cities	AGE	2,409
	AGI	900
	OHVI	4,781
	SS3	94
	SWI	142
Metro	AGE	2,214
	AGI	669
	OHVI	8,518
	SS3	254
	SWI	183
Eastern	AGE	1,699
	AGI	680
	OHVI	12,576
	SS3	13
	SWI	46
North Coast	AGE	3,199
	AGI	659
	OHVI	5,428
	SS3	25
	SWI	78
Northeast	AGE	3,465
	AGI	978
	OHVI	13,076
	SWI	64
Orange County	AGE	1,865
	AGI	399
	OHVI	1,263
	SS3	32
	SWI	37

Division Total:

65,746

OFFICER VERIFICATION

I, David L. Geier, 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 2010 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 28th day of June, 2011, in San Diego, California.

A handwritten signature in black ink, appearing to read "David L. Geier", written in a cursive style.

David L. Geier


Vice President of Electric Operations

San Diego Gas & Electric Company

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 2010 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 6th day of July 2011 at San Diego, California.

By: 

Martha Cendejas

***** SERVICE LIST *****

Last Updated on 01-JUL-2011 by: JVG
R9611004 LIST

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