Billie Jo Overturf
Regulatory Information Manager
San Diego Gas and Electric Company
8330 Century Park Court
San Diego, CA 92123-1530

June 28, 2012

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

Werner Blumer
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 – 2011 Annual Corrective Maintenance Report – General Order 165**

Dear Werner:

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,

Martha Arvalejos for

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 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 28th day of June 2012 at San Diego, California.

By: Martha Cendejas

Martha Cendejas

GENERAL ORDER 165

CORRECTIVE MAINTENANCE PROGRAM

REPORT FOR

2011

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, 2011 through December 31, 2011.

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.

Summary of the 2011 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" status 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.

SDG&E GENERAL ORDER 165

MAINTENANCE

2011 REPORT

Type of Inspection by Grid	Grids Due	Grids Outstanding
Patrols	8,628	0
Type of Inspection by Facility	**Facilities Due**	**Facilities Outstanding**
Overhead Detailed	47,752	0
Underground Detailed	19,974	0
Wood Pole Intrusive	16,701	0

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 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 CMP cycles are designed to exceed or adhere to GO 165 requirements. The following section describes SDG&Es' CMP cycles by equipment type.

Description of Major SDG&E GO165 Cycles

OVERHEAD VISUAL

- OHVI (Overhead Visual, 5-year)

  This cycle consists of a detailed 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 inspections.

- 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 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 SAP. The status of "Do Not Operate Energized" (DOE) switches, for prioritizing replacements, are also tracked in 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 intrusive inspection is normally an excavation around 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 simple visual 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 SAP.

PATROL, RURAL

- Patrol 2[1] (rural patrol, 2 year)

  The purpose of the rural patrol is to identify obvious structural problems and hazards. This cycle consists of a simple visual 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 SAP.

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[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 GO165 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.

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 2011 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, 2012, in San Diego, California.

David L. Geier

Vice President of Electric Operations

San Diego Gas & Electric Company