

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Revise and Clarify Commission Regulations Relating to the Safety of Electric Utility and Communications Infrastructure Provider Facilities.

Rulemaking 08-11-005  
(Filed November 6, 2008)

**SOUTHERN CALIFORNIA GAS COMPANY'S (U904G) GENERAL ORDER 165  
COMPLIANCE MAINTENANCE PROGRAM REPORT FOR 2014 SUBMITTED  
PURSUANT TO CPUC DECISION NO. 12-01-032**

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July 1, 2015

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Pursuant to California Public Utilities Commission Decision No. 12-01-032, Southern California Gas Company hereby submits its General Order 165 Compliance Maintenance Program Report for 2014, attached hereto as Exhibit 1.

Respectfully submitted,

By:     /s/ Albert Garcia    

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# EXHIBIT 1



**GENERAL ORDER 165**

**CORRECTIVE MAINTENANCE PROGRAM**

**REPORT FOR**

**2014**

## **Introduction**

In compliance with the California Public Utilities Commission (CPUC) Decision (D.) 12-01-032 and General Order (GO) 165, Southern California Gas Company (SoCalGas) submits its third annual GO 165 Compliance Maintenance Program Report. D.12-01-032 extended the inspection and reporting requirements of GO 165 to electric distribution facilities owned by SoCalGas.

The Compliance Maintenance Program at SoCalGas is administered by the operating groups with electrical distribution systems at their facilities. The required inspections are performed in accordance with GO 165 requirements, and any necessary follow-up maintenance work to correct deficiencies is completed by licensed electrical contractors.

This report contains the results of SoCalGas' inspection and maintenance of electric distribution facilities covering the period from January 1, 2014 through December 31, 2014.

## **Summary of the 2014 Year-end Report**

In 2014, SoCalGas inspected over 400 facilities of its electrical distribution system in accordance with the requirements of GO 165. In the event SoCalGas finds electrical distribution equipment that requires maintenance or replacement in accordance with GO 165, SoCalGas' goal is to undertake that work within 12 months from the date of inspection. Equipment that may pose a hazard to the public and/or to operating personnel is repaired within a shorter timeframe, based upon the severity of the problem. Equipment involving matters or issues outside of SoCalGas' control, such as those involving private property owners or environmental issues, may require more time to resolve. In this case, work that may be unresolved and nearing their 12-month due date would be labeled "Deferred". Work that is deferred is tracked by the operating group and is monitored until the work can be performed. SoCalGas' inspection activities resulted in no deferred work in 2014.

**SoCalGas GENERAL ORDER 165**

**2014 MAINTENANCE REPORT**

Type of Inspection by Facility	Facilities Due	Facilities Outstanding
Overhead Detailed	448	0 <sup>1</sup>
Underground Detailed	0	0
Wood Pole Intrusive	0	0
Type of Inspection by Grid	Grids Due	Grids Outstanding
Patrols	17	0

## **SoCalGas’ Electric Distribution Systems and Inspections**

SoCalGas has a limited number of electric distribution systems which are located at its four underground natural gas storage facilities and two natural gas compressor stations. These facilities all support SoCalGas’ primary mission—safe and reliable delivery of natural gas. SoCalGas’ electric distribution systems generally consist of power poles and distribution lines that distribute electricity within each facility. When new electrical distribution equipment is added, it is regarded as “inspected” at the date of installation. The new piece of equipment is then scheduled for inspection during the next applicable 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 maintenance 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 maintenance goals for the year. The goals for the year are determined by the last inspection date. SoCalGas’

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<sup>1</sup> In January 2015 SoCalGas identified an additional 4 poles, these poles will be included on the 2015 report.

maintenance cycles are designed to meet or exceed the GO 165 requirements. The following section describes SoCalGas' maintenance cycles.

### **Description of Major SCG 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.

#### 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 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 SoCalGas 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. If a pole that appears to need replacement is found on a CMP inspection, SoCalGas' contractor for wood pole integrity inspections 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). SoCalGas follows 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 rural 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 the SoCalGas tracking system.

#### 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 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." When Patrols have been completed, any identified structural problems and hazards are recorded in the SoCalGas tracking system.

**SoCalGas CMP INSPECTION CYCLES**

**SoCalGas System Inspection Cycles**

**(Maximum intervals in years)**

		PATROL		DETAILED		INTRUSIVE	
		Urban	Rural	Urban	Rural	Urban	Rural
<b>Transformers</b>							
	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		
<b>Switching/Protective Devices</b>							
	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		
	OII & Gas switches (above or below surface)	Patrol1	Patrol2	SW 3	SW 3		
<b>Regulators/Capacitors</b>							
	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		
<b>Overhead Conductors and Cables</b>		Patrol1	Patrol2	OHVI 5	OHVI 5		
<b>Street Lighting</b>		Patrol1	Patrol2	x	x		
<b>Wood Poles under 15 Years</b>		Patrol1	Patrol2	x	x	x	x
<b>Wood Poles over 15 years which have not been subject to intrusive inspection</b>		Patrol1	Patrol2	x	x	Wood Pole Intrusive 10	Wood Pole Intrusive 10
<b>Wood Poles which passed intrusive inspection</b>						Wood Pole Intrusive 20	Wood Pole Intrusive 20

**OFFICER VERIFICATION**

I, Douglas M. Schneider, declare the following:

I am an Officer of SoCalGas and am authorized to make this verification on its behalf. I am informed and believe that the matters stated in the foregoing 2014 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 30<sup>th</sup> day of June, 2015, in Los Angeles, California.

*Douglas M. Schneider*

Douglas M. Schneider

Vice President of Gas Engineering and System Integrity

SoCalGas