

**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
CORRECTIVE MAINTENANCE PROGRAM REPORT FOR 2015 SUBMITTED
PURSUANT TO CPUC DECISION NO. 12-01-032**

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EXHIBIT



GENERAL ORDER 165

CORRECTIVE MAINTENANCE PROGRAM

REPORT FOR

2015

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, 2015 through December 31, 2015.

Summary of the 2015 Year-end Report

In 2015, SoCalGas inspected over 500 facilities of its electrical distribution system in accordance with the requirements of GO 165. Our inspections in 2015 included 4 poles that were formally added into SoCalGas inventory at our Wheeler Ridge facility. These facilities were previously understood to be part of PG&E responsibility. 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

tracked by the operating group and is monitored until the work can be performed. SoCalGas' inspection activities resulted in no deferred work in 2015.

SoCalGas GENERAL ORDER 165

2015 MAINTENANCE REPORT

Type of Inspection by Facility	Facilities Due	Facilities Outstanding
Overhead Detail	565	0
Underground Detailed	0	0
Wood Pole Intrusive	0	0
Type of Inspection	Grids Due	Grids Outstanding
Patrols (Grid)	11	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 are scheduled for inspection at the required interval.

All equipment on a given structure are 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' maintenance cycles are designed to meet or exceed the GO 165 requirements. The following section describes SoCalGas' maintenance cycles.

Description of Major SoCalGas Corrective Maintenance Program (CMP) Cycles

OVERHEAD VISUAL

- OHVI (Overhead Visual, Maximum, 5 year cycle)

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.

WOOD POLE INTEGRITY

- Pole (10/20 year cycle)

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 process typically is 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 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 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). SoCalGas' 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, Maximum 1 year cycle)

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 SoCalGas tracking system.

PATROL, RURAL

- Patrol 2 (rural patrol, Maximum 2 year cycle)

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 SoCalGas tracking system.

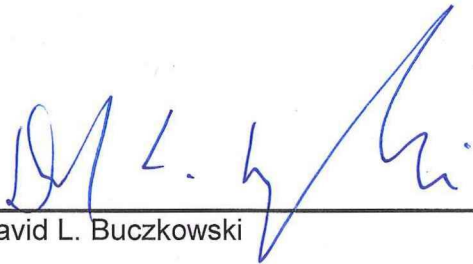
OFFICER VERIFICATION

I, David L. Buczkowski, declare the following:

I am an Officer of Southern California Gas and am authorized to make this verification on its behalf. I am informed and believe that the matters stated in the foregoing 2015 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 23rd day of June, 2016, in Los Angeles, California.



David L. Buczkowski

Vice President of Gas Engineering & Major Projects

Southern California Gas Company