SDGE

A Sempra Energy utility

Joseph Kloberdanz
Manager
Electric Case Management
San Diego Gas & Electric Company
8330 Century Park Court
San Diego, CA 92123

June 30, 2004

PUG 100
R.96-11-004

Docket Clerk
California Public Utilities Commission
505 Van Ness Avenue, Room 2001
San Francisco, CA 94102

RE: Electric Distribution Standards Proceeding - SDG&E's General Order 165 Annual Corrective Maintenance Report

Dear Docket Clerk:

Pursuant to Decision 97-03-070, enclosed please find a copy of San Diego Gas & Electric Company's above-described report. The original and five (5) copies of the document were filed at the California Public Utilities Commission's office in San Diego, 1350 Front Street, San Diego, CA 92101.

A copy of this filing is being served on the parties of record in R.96-11-004 as evidenced by the attached Certificate of Service.

Questions about this report should be directed to Petrina Burnham at (858) 654-1712 or pburnham@semprautilities.com.

Sincerely,

Petrina Burnham for

Joseph R. Kloberdanz
Regulatory Case Manager

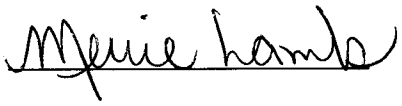
Attachment

cc: Parties of record in R.96-11-004 (electronically)

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 2003 to all parties identified in the service list in R.96-11-004. Service was effected either electronically or by placing copies in properly addressed sealed envelopes and depositing such envelopes in the United States Mail with first-class postage prepaid.

Executed this 30th day of June 2004 at San Diego, California.

By: 

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking for Electric) Distribution Facility Standard Setting) _____)	R.96-11-004 (Filed November 8, 1996)

SAN DIEGO GAS AND ELECTRIC COMPANY (U 902-E) GENERAL ORDER 165 - 2003 COMPLIANCE REPORT ON ITS CORRECTIVE MAINTENANCE PROGRAM

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June 30, 2004

SAN DIEGO GAS & ELECTRIC

CORRECTIVE MAINTENANCE PROGRAM

REPORT FOR

2003

INTRODUCTION

This report contains the results of San Diego Gas and Electric's (SDG&E) General Order (GO) 165 compliance program for inspection and maintenance of electric distribution facilities for the period January 1 through December 31, 2003 as Attachment A.

SDG&E's GO 165 compliance program is called the Corrective Maintenance Program (CMP) and is managed through SDG&E's Electric Transmission and Distribution Organization. By coordinating 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. CMP uses the DIMS (Distribution Inspection Maintenance System) 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.

In the last week of October and the first week of November 2003, the San Diego area was devastated by firestorms (see attachment C letter dated November 13, 2003 sent to William Ahern Executive Director of the California Public Utilities Commission). Thousands of SDG&E customers were affected by the resulting power outages. This firestorm caused SDG&E to commit all it's resources toward the restoration of our system, which in turn caused a delay in conducting our GO 165 inspections. Therefore, SDG&E could not complete the normal cycle of patrols, inspections and follow-up corrections. As stated in the above-mentioned letter SDG&E requested a deferral of its CMP Program. SDG&E resumed its normally scheduled inspections and repair activities as of March 2004.

Due to the firestorm, SDG&E was not able to complete all of its scheduled Urban Patrol **(84%)**, but will do so by year-end 2004. Fifty eight percent of the Rural Patrol was completed in year one of a two-year cycle.

The Detailed Inspections are shown as a total and percentage breakdown of number of equipment inspected and repaired. Corrective action for items other than those rated as needing immediate attention is achieved within 12 months. As SDG&E performs its maintenance program, all infractions observed by the inspector affecting a facility are recorded in a Mobile Data Terminal (MDT).

Infractions are not rated as to priority, unless it requires immediate action, otherwise, all are treated as needing to be repaired within the 12-month timeframe.

Under certain circumstances beyond our control equipment repairs cannot be accomplished within the allotted timeframe. These unusual occurrences are evaluated for a "Deferred" status on an individual basis. Compared to the number of facilities inspected in 2003 ***(99,958)*** to the number of deferred facilities ***(76)*** the percentage is small **(0.0008).** Many of the facilities given a "Deferred" status within DIMS for 2003 are a direct result of the firestorms that SDG&E experienced in October 2003.

To keep the quantity of facilities that may qualify for this category to a small aggregation SDG&E has set strict conditions under which a facility needing repairs may be deferred:

- Infractions caused by third party utilities that prevent SDG&E from completing inspections or repairs
- Private Property Issues
- Engineering Issues
- Permit Issues
- Right-of-Way Access Issues
- Legal Requirements

Items that exceeded the 12-month repair completion date are noted in DIMS with an explanation.

SDG&E completes all inspections within the year scheduled unless access was denied by outside forces such as property owners or environmental permits. In cases where inspectors are denied access, attempts are made through legal and other means to gain access. In addition, monitoring of these locations is coded to enable ultimate reconciliation with the requirements of GO 165.

The quantity of equipment is dynamic because of additions and removals of equipment due to various reasons such as replacement, demolition, new customers, and conversion of overhead lines to underground lines. 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 2004 are included as Attachment "B" 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.

Associated equipment and components on a given structure are inspected at the same time and the inspection record is documented in the structure record. The CMP goals for the year are determined by the system-wide counts of facilities in each inspection type, divided by the number of years in the cycle length.

All required categories (Patrols, Detailed and Intrusive) are included in the following SDG&E CMP Categories.

The individual segments for 2003 are as follows:

Patrols

A simple visual inspection of applicable utility equipment and structures that is designed to identify obvious structural problems and hazards. The patrols may be performed in the course of other company business. Patrols are divided into urban and rural areas as defined in GO 165.

Detailed overhead visual inspection (OHVI)

A walking program of visual inspection of overhead facilities and primarily pole mounted equipment. All overhead distribution facilities attached to any pole are inspected. The number of poles will differ from the intrusive pole inspection number since some facilities are attached to transmission poles or poles owned by SBC.

Detailed underground external inspection (Dead Front - AGE)

An inspection cycle in which each qualifying piece of equipment is opened for an inspection of the cabinet interior and associated components, as well as, an inspection of the cabinet exterior and supporting structures. The internal portion of this inspection was started on July 1, 1999. This inspection is now the same as the "Detailed underground internal inspection"; however, the data is being maintained separately for future comparative purposes.

Detailed underground internal inspection (Live Front - AGI)

An inspection cycle in which each qualifying piece of equipment is opened for an inspection of the cabinet interior and associated components, as well as, an inspection of the cabinet exterior and supporting structures. An internal inspection incorporates an external inspection.

Underground subsurface inspections (SS3)

An inspection cycle in which each subsurface enclosure containing qualifying pieces of equipment except switches is opened for an inspection of the interior

and associated components inside, as well as, an inspection of the enclosure exterior. All switches are inspected under the switch inspection cycle.

Underground oil and gas switch inspection (SWI)

This is a specialized internal inspection of oil and gas filled switches found in pad-mounted enclosures and subsurface underground structures (vaults, manholes, etc.). Oil samples and pressure readings are obtained, recorded, and laboratory analysis of oil samples is performed.

Intrusive wood pole reinforcement inspection (POIN)

A contractor performs external and intrusive wood pole inspections for integrity, as well, as wood preservative treatments and pole reinforcements. This number will differ from the overhead visual Inspection number of poles since only SDG&E-owned distribution poles are included in the intrusive inspection.

ATTACHMENT A

CPUC Year End Report

District	*Inspection Type*	*Total #*	*# Insp*	*Insp % Total*	*# Need Maint Corrected*	*% Need Maint Corrected*
Beach Cities						
	OH Regulators/Capacitors	170	32	18.82%	17	53.13%
	OH Switches/Protective Devices	2,353	444	18.87%	331	74.55%
	OH Transformer	5,784	1,151	19.90%	896	77.85%
	Pole	22,435	4,754	21.19%	3,327	69.98%
	UG Pad Mounted DEAD Front Transformer	11,045	2,462	22.29%	2,190	88.95%
	UG Pad Mounted LIVE Front Transformer	1,540	256	16.62%	246	96.09%
	UG Pad Mounted Regulators/Capacitors	94	24	25.53%	23	95.83%
	UG Pad Mounted Switches/Protective Devices	1,831	429	23.43%	416	96.97%
	UG Subsurface Switches/Protective Devices	422	129	30.57%	92	71.32%
	UG Subsurface Transformer	268	92	34.33%	59	64.13%
	WoodPole	19,252	5,688	29.54%	163	2.87%
Totals		*65,194*	*15,461*		*7,760*	
Metro						
	OH Regulators/Capacitors	237	57	24.05%	26	45.61%
	OH Switches/Protective Devices	2	1	50.00%	1	100.00%
	OH Switches/Protective Devices	3,757	804	21.40%	373	46.39%
	OH Transformer	10,685	2,144	20.07%	1,153	53.78%
	Pole	43,197	9,137	21.15%	4,543	49.72%
	UG Pad Mounted DEAD Front Transformer	10,966	1,890	17.24%	1,646	87.09%
	UG Pad Mounted LIVE Front Transformer	1,409	302	21.43%	288	95.36%
	UG Pad Mounted Regulators/Capacitors	34	8	23.53%	7	87.50%
	UG Pad Mounted Switches/Protective Devices	1,138	145	12.74%	133	91.72%
	UG Subsurface Regulators/Capacitors	34	14	41.18%	12	85.71%
	UG Subsurface Switches/Protective Devices	497	102	20.52%	81	79.41%
	UG Subsurface Transformer	709	152	21.44%	99	65.13%
	WoodPole	38,453	1,530	3.98%	371	24.25%
Totals		*111,118*	*16,286*		*8,733*	

District	*Inspection Type*	*Total #*	*# Insp*	*Insp % Total*	*# Need Maint Corrected*	*% Need Maint Corrected*
Eastern						
	OH Regulators/Capacitors	296	74	25.00%	38	51.35%
	OH Switches/Protective Devices	5,378	1,296	24.10%	685	52.85%
	OH Transformer	17,907	3,471	19.38%	1,826	52.61%
	Pole	59,660	11,484	19.25%	5,546	48.29%
	UG Pad Mounted DEAD Front Transformer	9,807	2,057	20.97%	1,815	88.24%
	UG Pad Mounted LIVE Front Transformer	1,632	317	19.42%	294	92.74%
	UG Pad Mounted Regulators/Capacitors	25	9	36.00%	7	77.78%
	UG Pad Mounted Switches/Protective Devices	700	147	21.00%	136	92.52%
	UG Subsurface Switches/Protective Devices	139	38	27.34%	11	28.95%
	UG Subsurface Transformer	61	22	36.07%	10	45.45%
	WoodPole	51,736	217	0.42%	28	12.90%
Totals		*147,341*	*19,132*		*10,396*	
North Coast						
	OH Regulators/Capacitors	130	22	16.92%	20	90.91%
	OH Switches/Protective Devices	3,266	568	17.39%	525	92.43%
	OH Transformer	6,930	1,253	18.08%	1,157	92.34%
	Pole	22,779	4,164	18.28%	3,747	89.99%
	UG Pad Mounted DEAD Front Transformer	17,308	2,834	16.37%	2,733	96.44%
	UG Pad Mounted LIVE Front Transformer	1,028	196	19.07%	176	89.80%
	UG Pad Mounted Regulators/Capacitors	40	8	20.00%	8	100.00%
	UG Pad Mounted Switches/Protective Devices	1,330	209	15.71%	196	93.78%
	UG Subsurface Switches/Protective Devices	255	87	34.12%	80	91.95%
	UG Subsurface Transformer	81	20	24.69%	18	90.00%
	WoodPole	20,531	344	1.68%	10	2.91%
Totals		*73,678*	*9,705*		*8,670*	
Northeast						
	OH Regulators/Capacitors	254	81	31.89%	45	55.56%
	OH Switches/Protective Devices	5,212	1,356	26.02%	752	55.46%
	OH Transformer	21,407	3,753	17.53%	2,192	58.41%
	Pole	65,258	12,808	19.63%	6,172	48.19%
	UG Pad Mounted DEAD Front Transformer	19,801	3,300	16.67%	2,751	83.36%
	UG Pad Mounted LIVE Front Transformer	1,469	216	14.70%	184	85.19%
	UG Pad Mounted Regulators/Capacitors	59	23	38.98%	22	95.65%
	UG Pad Mounted Switches/Protective Devices	1,391	380	27.32%	328	86.32%
	UG Subsurface Switches/Protective Devices	245	60	24.49%	54	90.00%
	UG Subsurface Transformer	6				
	WoodPole	60,928	13,387	21.97%	72	0.54%
Totals		*176,030*	*35,364*		*12,572*	

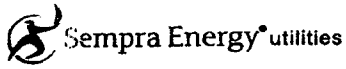
District	*Inspection Type*	*Total #*	*# Insp*	*Insp % Total*	*# Need Maint Corrected*	*% Need Maint Corrected*
Orange County						
	OH Regulators/Capacitors	59	17	28.81%	7	41.18%
	OH Switches/Protective Devices	776	180	23.20%	88	48.89%
	OH Transformer	1,357	267	19.68%	171	64.04%
	Pole	5,642	1,223	21.68%	569	46.52%
	UG Pad Mounted DEAD Front Transformer	9,737	1,923	19.75%	1,880	97.76%
	UG Pad Mounted LIVE Front Transformer	626	117	18.69%	115	98.29%
	UG Pad Mounted Regulators/Capacitors	56	8	14.29%	8	100.00%
	UG Pad Mounted Switches/Protective Devices	920	184	20.00%	180	97.83%
	UG Subsurface Switches/Protective Devices	148	33	22.30%	33	100.00%
	UG Subsurface Transformer	216	50	23.15%	48	96.00%
	WoodPole	4,907	8	0.16%	1	12.50%
Totals		*24,444*	*4,010*		*3,100*	
Grand Total		**597,805**	**99,958**		**51,231**	

ATTACHMENT B

Scheduled Inspection For 2004

district_alpha	insp_typ	sub_typ	Total Structures	2004
Beach Cities	AG	E	2574	2574
Beach Cities	AG	I	923	923
Beach Cities	OH	VI	4090	4090
Beach Cities	PO	IN	536	536
Beach Cities	SS	10	1491	1491
Beach Cities	AG	E	2505	2505
Metro	AG	I	591	591
Metro	OH	VI	8382	8382
Metro	PO	IN	1205	1205
Metro	SS	10	1333	1333
Metro	SW	I	1	1
Eastern	AG	E	2087	2087
Eastern	AG	I	610	610
Eastern	OH	VI	11388	11388
Eastern	PO	IN	24457	24457
Eastern	SS	10	1067	1067
North Coast	AG	E	3910	3910
North Coast	AG	I	607	607
North Coast	OH	VI	4697	4697
North Coast	PO	IN	19509	19509
North Coast	SS	10	2083	2083
North East	SS	3	1	1
North East	AG	E	3816	3816
North East	AG	I	721	721
North East	OH	VI	12751	12751
North East	PO	IN	22309	22309
North East	SS	10	2267	2267
Orange County	AG	E	1734	1734
Orange County	AG	I	346	346
Orange County	OH	VI	1041	1041
Orange County	PO	IN	4295	4295
Orange County	SS	10	1022	1022

ATTACHMENT C



Lee Schavrien
Vice President
Regulatory Affairs

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November 13, 2003

William Ahern
Executive Director
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Dear Mr. Ahern:

As you know, firestorms ravaged hundreds of thousands of acres of land in San Diego County, destroying thousands of homes, during the last week of October and first week of November. Numerous SDG&E facilities were damaged or destroyed and tens of thousands of customers experienced outages. SDG&E crews, contract crews, and mutual assistance crews have worked around the clock to effect repairs and restore service.

SDG&E crews that normally perform Corrective Maintenance Program (General Order 165) inspections and follow-up corrections have been committed to fire related repairs for the last few weeks. We expect that they will be needed for fire related repairs for the next few months. Consequently, SDG&E needs to defer its G.O. 165 inspections and follow-up corrections for up to six months. SDG&E proposes to resume inspections by May 1, 2004 and complete follow-up corrections within 18 months instead of 12 months as filed in SDG&E's G.O. 165 Compliance Plan dated July 1, 1997. The additional time for inspections and corrections will allow such work to be done in a cost-effective manner. Attempting to catch up in less time will require significant crew overtime, generally at double time rates.

Prior to the firestorms, SDG&E was on track to complete all of the inspections required for 2003 and follow-up corrections within 12 months. SDG&E's 2003 annual report will reflect activity up to the beginning of the firestorms. The 2004 report will include the remainder of 2003. SDG&E expects to return to a 12-month correction period by December 31, 2005 and to its regular inspection schedule by that time as well.

Should you have any questions, please contact Joe Kloberdanz at 858-654-1771.

Sincerely,

Lee Schavrien
Vice-President, Regulatory Affairs

cc: Paul Clanon – CPUC
Richard Clark – CPUC
Brian Schumacher – CPUC
Zee Wong – CPUC
Mark Ziering – CPUC
Caroline Winn – SDG&E

VERIFICATION

I affirm that the contents of this report are true to the best of my knowledge, signed under penalty of perjury this 30th day of June 2004, in San Diego, California.

Caroline Winn, Director

Electric Transmission and Distribution Services

Prepared by: Gregory L. Walters

Brad Nielsen