



Billie J. Overturf
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8330 Century Park Court
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June 30, 2006

PUG 100
R.96-11-004

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

Re: SDG&E's General Order 165 – 2005 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 (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 me at (858) 654-1779

Sincerely,

Billie J. Overturf for

Billie Overturf
Regulatory Information Manager

Cc: Parties of record in R.96-11-004

PUBLIC UTILITIES COMMISSION
RECEIVED
JUN 30 2006
SAN DIEGO OFFICE

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 – 2005 COMPLIANCE REPORT
ON ITS CORRECTIVE MAINTENANCE PROGRAM

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VERIFICATION

I affirm that the contents of this report, subject to the corrections that will be provided by SDG&E as referenced in paragraph 1, page 5 of this report are true to the best of my knowledge, signed under penalty of perjury this 30th day of June 2006, in San Diego, California.

A handwritten signature in black ink, appearing to read "Caroline Winn", is written above a horizontal line.

Caroline Winn, Director

Electric Transmission & Distribution Planning

Prepared by: Gregory L. Walters

Craig Holland



SAN DIEGO GAS & ELECTRIC COMPANY'S

GENERAL ORDER 165

CORRECTIVE MAINTENANCE PROGRAM

REPORT FOR

2005

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, 2005 through December 31, 2005.

SDG&E's GO 165 compliance program is called the Corrective Maintenance Program (CMP) and is managed by SDG&E's Electric Transmission and Distribution Organization. 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. The 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.

Summary of the 2005 Year-end Report

In a letter dated November 13, 2003 to William Ahern, Executive Director, California Public Utilities Commission (Commission), SDG&E requested a deferral of its General Order 165 program until December 2005. This request was due to the damage caused by the 2003 October/November firestorm. In the six months following the firestorm, SDG&E dedicated all of its resources toward the restoration of power to its customers and to repairing its electric distribution and transmission systems. As noted in the November 13th letter, this event greatly impacted SDG&E's ability to perform its normal General Order 165 functions of inspection and repair work.

Regarding the deferral of SDG&E's General Order 165 program due to the 2003 firestorm, SDG&E would like the Commission to note that as of December 31, 2005 SDG&E is back in compliance with its filed maintenance program, which means that all GO 95 and GO 128 infractions found from inspections are corrected within 12 months.

SDG&E continues to have the goal of maintaining a 12-month correction period of infractions found during GO 165 inspections. Infractions that present a hazard to the public and to electric distribution line personnel are repaired immediately or within a shorter timeframe, relative to the severity of the infraction. Infractions that are out of the control of SDG&E, such as private property and third party utility issues, may require more time to be resolved. These infractions are noted as "Pending" within our record keeping process and put in the "Deferred" category. Pending infractions in the "Deferred" category are tracked by SDG&E's Electric Transmission and Distribution Planning, Electric Transmission and Distribution Engineering, Vegetation Management, Land Management, Legal and the Joint Facilities Department. These departments continue to refine the process for resolving these items as outlined in Attachment A. Facilities that are considered for Deferral status must meet strict internal requirements.

To assure compliance with GO 165 inspection requirements and SDG&E's 12-month correction period for required maintenance, SDG&E has developed an active centralized Quality Assurance Program and a decentralized C&O Center internal audit program. Both of these programs audit inspections and repairs to assure that all infractions are identified and corrected.

During 2005 Quality Assurance and internal audits, SDG&E discovered that two employees who were directly connected with our inspection and repair process, failed to perform their responsibilities under the CMP program. In June of 2005, SDG&E's Compliance Management Group met with representatives of the Consumer Protection & Safety Division (CPSD) of the CPUC and informed them that two of SDG&E's construction centers were out of compliance because of these two employees who failed to perform inspections and repairs adequately. Measures were taken to identify the full extent of the situation and make appropriate corrections to SDG&E's records. This failure to perform inspections and repairs properly caused discrepancies in the number of infractions reported as 'cleared' in this filing. SDG&E has taken action to re-inspect all of the facilities that were inspected by these two employees. All of the repair work associated with their inspections will be completed by August 31, 2006.

Summary and Introduction of the Year-end General Order 165 Report

General Order 165 requires the reporting of annual inspection and repair performance data. The following is a matrix summary of San Diego Gas & Electric's GO 165 2005 inspection program. Attachment A contains an explanation of SDG&E's third party infraction process in connection with the inspection GO 165 and the number GO 95 and 128 infractions that are out of SDG&E's control. Attachment B contains the proposed inspection scheduled for the year 2006.

CPUC 2005 Yearend Report

<i>District</i>	<i>Inspect Type</i>	<i>Total Structures</i>	<i>Total Structures Inspected</i>	<i>Percent Structures Scheduled</i>	<i>Total Structures Inspected</i>	<i>Percent Scheduled Inspected</i>	<i>Inspected in 2004, cleared in 2005</i>	<i>Inspected in 2005, cleared in 2005</i>	<i>Inspected in 2005, pending</i>
<i>Beach Cities</i>	AGE	12,062	2,623	21.75%	2,623	100.00%	98	2,197	63
	AGI	4,681	1,007	21.51%	1,007	100.00%	79	819	45
	OHVI	22,823	4,689	20.55%	4,689	100.00%	1,301	3,013	1,636
	POIN	19,712	452	2.29%	452	100.00%	102	337	16
	SS3	274	94	34.31%	94	100.00%	2	18	17
	SWI	516	184	35.66%	184	100.00%	12	119	23
<i>Eastern</i>									
	AGE	10,200	2,131	20.89%	2,131	100.00%	266	1,596	154
	AGI	2,895	658	22.73%	658	100.00%	77	522	114
	OHVI	58,763	12,455	21.20%	12,455	100.00%	2,927	3,797	5,310
	POIN	51,029	10,756	21.08%	10,756	100.00%	1	9,333	485
	SS3	38	13	34.21%	13	100.00%	1	5	3
	SWI	137	54	39.42%	54	100.00%	3	47	16
<i>Metro</i>									
	AGE	12,252	2,903	23.69%	2,903	100.00%	705	2,251	1,209
	AGI	3,529	832	23.58%	832	100.00%	51	596	189
	OHVI	43,368	9,405	21.69%	9,405	100.00%	3,064	3,369	3,747
	POIN	38,552	258	0.67%	258	100.00%	211	83	9
	SS3	496	207	41.73%	207	100.00%	28	73	31
	SWI	454	180	39.65%	180	100.00%	31	97	35
<i>North Coast</i>									
	AGE	18,824	4,457	23.68%	4,457	100.00%	2,150	3,424	1,398
	AGI	3,507	925	26.38%	925	100.00%	285	636	249
	OHVI	23,730	5,279	22.25%	5,279	100.00%	2,812	4,952	2,031
	POIN	21,292	99	0.46%	99	100.00%	9	6	0
	SS3	70	24	34.29%	24	100.00%	3	22	5
	SWI	266	91	34.21%	91	100.00%	22	84	47
<i>Northeast</i>									
	AGE	20,880	5,006	23.98%	5,006	100.00%	653	3,609	1,911
	AGI	4,444	1,009	22.70%	1,009	100.00%	130	733	346
	OHVI	63,994	12,146	18.98%	12,146	100.00%	6,250	5,335	4,279
	POIN	60,026	7,088	11.81%	7,088	100.00%	373	6,289	63
	SS3	2	0	0	0	<i>na</i>	0	0	0
	SWI	263	78	29.66%	78	100.00%	19	73	33
<i>Orange County</i>									
	AGE	10,452	2,116	20.24%	2,116	100.00%	305	1,860	732
	AGI	2,016	442	21.92%	442	100.00%	65	379	178
	OHVI	5,612	1,190	21.20%	1,190	100.00%	271	668	310
	POIN	4,916	40	0.81%	40	100.00%	0	0	0
	SS3	215	28	13.02%	28	100.00%	3	23	0
	SWI	153	50	32.68%	50	100.00%	2	49	30

Kinetic Divisions of Inspections

The quantity of facilities is dynamic because of additions and removals of equipment due to maintenance, demolition, new customers, new technology, reliability, conversion of overhead lines to underground lines, or other reasons. When a piece of 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 2006 are included as Attachment "B" in accordance with GO 165.

Equipment inspections are divided into districts, categories of equipment type, 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.

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 are determined by the system-wide counts of facilities in each inspection type, divided by the number of years in the cycle length.

SDG&E CMP cycles are designed to comply with General Order 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 and pole-mounted facilities with primary and secondary conductors and distribution equipment on transmission poles.

These inspections identify conditions out of compliance with GO165, GO95 and/or SDG&E's Construction Standards. This is a five-year cycle.

ABOVE GROUND 5 (INTERNAL AND EXTERNAL INSPECTIONS)

This cycle consists of AGE (Above Ground Deadfront) and AGI (Above Ground Livefront) detailed external and internal inspections of deadfront and livefront pad-mounted facilities to identify conditions out of compliance with GO 128.

- AGE (Above Ground Deadfront, 5- year)

This cycle consists of a detailed external and internal inspection of deadfront pad-mounted facilities to identify conditions out of compliance with GO128 and/or SDG&E's Construction Standards. This is a five-year inspection cycle. The AGE cycle originally only required an external inspection, but a change in 1999 required that AGE equipment receive both internal and external inspections. The cycle is still named AGE to separate the deadfront equipment data from livefront equipment data.

- AGI (Above Ground Livefront, 5- year)

This cycle consists of a detailed external and internal inspection of livefront pad-mounted facilities to identify conditions out of compliance with GO165, GO128 and/or SDG&E's Construction Standards. 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 handholes and subsurface enclosures) containing distribution equipment. (Thus structures with cable taps only or pass throughs only are in the SS10 cycle.) The SS3 cycle consists of a detailed inspection of these facilities to identify conditions out of compliance with GO165, GO128 and/or SDG&E's Construction Standards. This is a three-year inspection cycle

SUBSURFACE, NO EQUIPMENT

- SS10 (Subsurface, 10-year)

Subsurface enclosures, vaults, handholes and manholes without equipment are not required to be inspected under GO 165. However, GO 128 does require that all equipment be in safe and reliable operating condition. Therefore, SDG&E has implemented a 10-year inspection cycle to address these facilities. This cycle consists of a detailed inspection of these facilities to identify conditions out of compliance with GO128 and SDG&E's Construction Standards.

SWITCH

- SW3 (Oil and 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. There are approximately 1,750 switches in this cycle. Oil samples and gas pressure readings are obtained and recorded in the Distribution Inspection and Maintenance System (DIMS). The laboratory performs analysis of oil samples for low dielectric strength and high water content. DIMS stores these results with the inspection record. DIMS also tracks the status of "Do Not Operate Energized" (DOE) switches for prioritizing replacements. Other conditions out of compliance with GO128 and/or SDG&E's Construction Standards 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 GO165, 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 10-year cycle requirements result in approximately 23,200 poles to be inspected each year.

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 or Fiberwrap). 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 SDG&E's District personnel may bore into the pole to determine if it needs reinforcement or replacement based on the remaining shell thickness. The decision to restore a pole rather than replace the pole is based on the strength of the pole which is 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 or Fiber-wrap based on the remaining shell thickness for various lengths of pole. If a pole does not have sufficient shell thickness for C-truss or Fiber-wrap, and the pole is recommended for replacement.

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 drive by, fly by, or walk-by patrol of every overhead, underground and streetlight facility in urban areas. Under agreement of interpretation with the CPUC, 'urban' is defined as incorporated areas. (GO165 calls for 'urban' as those areas with 1000 persons or more per square

mile). The General Order defines a patrol as a “simple visual inspection, of applicable utility equipment and structures that is designed to identify obvious structural problems and hazards.” Patrol Inspection Record forms are used to identify obvious structural problems and hazards, which are also recorded in DIMS.

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 drive by, fly by, or walk-by inspections of every overhead, underground and streetlight facilities in rural areas. Under agreement of interpretation with the CPUC, ‘rural’ is defined as unincorporated areas. (GO165 calls for ‘rural’ as those areas with less than 1000 persons per square mile). The General Order defines a patrol as a “simple visual inspection, of applicable utility equipment and structures that is designed to identify obvious structural problems and hazards.” Patrol Inspection Record forms are used to identify obvious structural problems and hazards, which are also recorded in DIMS.

SDG&E CMP INSPECTION CYCLES
CYCLES FROM SDGE'S FILED COMPLIANCE PLAN

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		
Streetlighting	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

Where the cycles are:

Patrol1 Patrol cycle- one-year
Patrol2 Patrol cycle- two year
OHVI 5 Overhead five-year detail inspection
AGE 5 Above Ground Deadfront external and internal five-year detail inspection
AGI 5 Above Ground Livefront external and internal five-year detail inspection
SS 3 Subsurface internal three-year detail inspection
SW 3 Switch internal three-year inspection
POLE 10 Wood pole intrusive ten-year inspection

PROGRAM CYCLE SUMMARY

Program Cycle	Cycle Interval	Start Year
Overhead Visual	5	1998
Above Ground Deadfront (AGE)	5	1998

**CORRECTIVE
MAINTENANCES
DETAIL
INSPECTIONS**

EQUIPMENT DETAIL OVERHEAD

Overhead Distribution System:

Overhead Visual

Distribution Poles & Distribution Equipment	Inspection Program (in years)			
	Urban	Rural	Detailed	Intrusive
Pole	1	2	5	10, 20
Double Pole	1	2	5	10, 20
Pole Stub	1	2	5	10, 20
Crossarm	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	

EQUIPMENT DETAIL ABOVE GROUND DEADFRONT (AGE)

Underground Distribution System:

Above Ground Deadfront (AGE)

UG Distribution Structure & Distribution Equipment	Inspection Program (in years)		
	Urban	Rural	External
Pad Structure - D Facility ID			
• Pad with no Equip.	1	2	5
• Pad with following Equip.	1	2	5
• 1 Phase Xfmr (Dead)	1	2	5
• 3 Phase Xfmr (Dead)	1	2	5
• Auto Throw Over	1	2	5
• Service Restorer	1	2	5
• Boost/Buck Station (Dead)	1	2	5
• Step Up/Dwn Station (Dead)	1	2	5
• Regulator (Dead)	1	2	5
Manhole - W or Y Facility ID			
• Manhole with following Equip.	1	2	5
• 1 Phase Xfmr (Dead)	1	2	5
• 3 Phase Xfmr (Dead)	1	2	5
Prim. HH - B or W Facility ID			
• Prim. HH with no Equip.	1	2	5
• Prim. HH w/following Equip.	1	2	5
• 1 Phase Xfmr (Dead)	1	2	5
• 3 Phase Xfmr (Dead)	1	2	5
• Auto Throw Over	1	2	5
Subsurface Encl.- S Facility ID			
• Subsurface Encl. w/no Equip.	1	2	5

EQUIPMENT DETAIL ABOVE GROUND LIVEFRONT (AGI)

Above Ground Livefront (AGI)

UG Distribution Structure & Distribution Equipment	Inspection Program (in years)		
	Urban	Rural	Internal
Pad Structure - D Facility ID			
• Pad with following Equip.	1	2	5
• Non-Oil/Gas Switch	1	2	5
• Non-Oil/Gas Group Switch	1	2	5
• 1 Phase Xfmr (Live)	1	2	5
• 3 Phase Xfmr (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/Dwn Station (Live)	1	2	5
• Regulator (Live)	1	2	5
Manhole - W or Y Facility ID			
• Manhole with following Equip.	1	2	5
• Non-Oil/Gas Switch	1	2	5
• Non-Oil/Gas Group Switch	1	2	5
• 1 Phase Xfmr (Live)	1	2	5
• 3 Phase Xfmr (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 Equip.	1	2	5
• Terminator	1	2	5
Prim. HH - B or W Facility ID			
• Prim. HH w/following Equip	1	2	5
• Non-Oil/Gas Switch	1	2	5
• Non-Oil/Gas Group Switch	1	2	5
• 1 Phase Xfmr (Live)	1	2	5
• 3 Phase Xfmr (Live)	1	2	5
• Fuse Cabinet	1	2	5

EQUIPMENT DETAIL ABOVE GROUND LIVEFRONT (AGI) (CONTINUED)

Above Ground Livefront (AGI) (Continued)

UG Distribution Structure & Distribution Equipment	Inspection Program (in years)		
	Urban	Rural	Internal
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 Equip.	1	2	5
• 1 Phase Xfmr (Dead or Live)	1	2	5
• 3 Phase Xfmr (Dead or Live)	1	2	5
• Terminator	1	2	5
• Cable Tap with AGI Equipment	1	2	5
• Step Up/Dwn Station	1	2	5

EQUIPMENT DETAIL SUBSURFACE 3

Subsurface 3

UG Distribution Structure & Distribution Equipment	Inspection	Program	(in years)
	Urban	Rural	Internal
Manhole - M Facility ID			
Manhole with following Equip.	1	2	3
• Non-Oil/Gas Switch			3
• Non-Oil/Gas Group Switch			3
• 1 Phase Xfmr (Dead or Live)			3
• 3 Phase Xfmr (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 Xfmr (Dead or Live)			3
• 3 Phase Xfmr (Dead or Live)			3
• Terminator			3
• Step Up/Dwn Station			3
• Service Restorer			3
• Cable Tap with Subsurface 3 Equipment			3
Vault - U Vault - U Facility ID			
Vault with following Equip.	1	2	3
• Non-Oil/Gas Switch			3
• Non-Oil/Gas Group Switch			3
• 1 Phase Xfmr (Dead or Live)			3
• 3 Phase Xfmr (Dead or Live)			3
• Fixed Capacitor			3
• Switched Capacitor			3
• Fuse Cabinet			3
• Step Up/Dwn Station			3
• Auto Throw Over			3
Subsurface Encl.- S Facility ID			
Subsurf. Encl containing	1	2	3
• Non-Oil/Gas Switch			3
• Non-Oil/Gas Group Switch			3
• 1 Phase Xfmr (Dead or Live)			3
• 3 Phase Xfmr (Dead or Live)			3

EQUIPMENT DETAIL SUBSURFACE 10

Subsurface 10

UG Distribution Structure & Distribution Equipment	Inspection Program (in years)		
	Urban	Rural	Internal
Manhole - W or Y Facility ID			
Manhole with no Equipment	1	2	10
Manhole - M Facility ID			
• Manhole with no Equip.	1	2	10
• Manhole with following Equip.	1	2	10
• Cable Tap with no Equipment			10
Primary Handhole - H Facility ID			
• Prim. HH with following Equip.	1	2	10
• Cable Tap with no Equipment			10
Vault - U Facility ID			
• Vault with following Equip.	1	2	10
• Cable Tap with no Equipment			10
Subsurface Encl.- S Facility ID			
• Subsurf. Encl w/following Equip.	1	2	10
• Cable Tap with no Equipment			10

EQUIPMENT DETAIL OIL & GAS SWITCHES

Oil and Gas Switches

UG Distribution Structure & Distribution Equipment	Inspection Program (in years)		
	Urban	Rural	Switch
Manhole - W or Y Facility ID			
Manhole with following Equip	1	2	3
• Oil/Gas Switch	1	2	3
• Oil/Gas Group Switch	1	2	3
Manhole - M Facility ID			
Manhole with following Equip	1	2	3
• Oil/Gas Switch			3
• Oil/Gas Group Switch			3
Prim. HH - B or W Facility ID			
Prim HH with following Equip	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 Equip.	1	2	3
• Oil/Gas Switch			3
• Oil/Gas Group Switch			3
Vault - U Facility ID			
Vault with following Equip.	1	2	3
• Oil/Gas Switch			3
• Oil/Gas Group Switch			3
Subsurface Encl.- S Facility ID			
Subsurf. Encl w/following Equip.	1	2	3
• Oil/Gas Switch			3
• Oil/Gas Group Switch			3

ATTACHMENT A

THIRD PARTY

INFRACTION

PROCESS

Third Party Infraction Process

Infractions caused by "Third Parties" are an ongoing issue that SDG&E has dealt with since the implementation of General Order 165. On a daily basis, overhead and underground inspectors encounter GO 95 and 128 infractions caused by telecommunications companies or private property owners, who do not understand the implications of these codes. For example, a large number of private property owners try to make underground pad-mounted equipment cosmetically aesthetic by building retaining walls and locating plant and shrubs in front of pad-mounted equipment. Many of the customers do not understand that their attempt to cover up equipment violates the workspace that General Order 128 requires SDG&E to maintain and may have possibly rendered equipment inaccessible by inspectors and line personnel.

Once SDG&E is aware of such violations, it is obligated to take action even though it did not cause the problem. SDG&E has developed the "Investigation Order System" that gives notification to the violating parties and attempts to bring about resolution of these types of infractions.

The Process involves:

1. The Inspector, upon a detailed inspection, observes and records the violation in the Mobile Data Terminal (MDT). This information is uploaded into SDG&E's "Distribution Inspection & Maintenance System" (DIMS) where it is officially recorded and tracked.
2. The Inspector records the structure identification number and the address/location.
3. The type of violation/infraction is recorded.
4. A digital picture of the infraction is taken.

5. CMG examines all information, the infraction is given a tracking number and recorded in the "Investigation Order Database".
6. CMG then attaches the "General Order 95/128 Infraction Form" requesting that the infraction be corrected in 90 days. Private property issues are forwarded to SDG&E's Land Department for resolution. Infractions caused by telecommunication companies or others are forwarded directly to the company causing the infraction.

In 2005, the Corrective Maintenance Program's "Investigation Order System" processed 3,176 "Third Party" Investigation Orders. Of the 3,176 orders, 925 were resolved. In 2004, 3,782 "Third Party" infractions were processed and 1,540 of these infractions were corrected by the third party causing the infraction.

SDG&E strives to be proactive in reducing the amount of "Third Party" infractions. On pad-mounted equipment, we have installed a sign similar to the "High Voltage" warning sign. This sign shows the workspace dimension needed for pad-mounted equipment. This sign is attached on the equipment in a position that is highly visible.

In addition to the workspace dimension alert sign, in 2004, SDG&E initiated programs with telecommunication companies in its service territory to develop a more common and comprehensive understanding of what is required by General Orders 95 and 128 when constructing and maintaining infrastructure. These programs have proven to be very beneficial for all parties, considering the fact that a large number of electric and communication equipment occupy jointly used overhead poles and underground trenches.

By educating its customers and companies that build their infrastructure in close proximity to electric facilities, SDG&E can reduce the number of "Third Party" violations of General Orders 95 and 128 found during the General Order 165 Detailed Inspection cycles.

ATTACHMENT B

2006

SCHEDULED

INSPECTIONS

CMP Scheduled Inspections for 2006

District	Inspection Type	Required inspections due in 2006
Beach Cities	AGE	1,964
	AGI	845
	OHVI	4,734
	SS3	76
	SWI	147
	SS10	438
Metro	AGE	1,922
	AGI	529
	OHVI	8,544
	SS3	86
	SWI	83
	SS10	449
Eastern	AGE	1,499
	AGI	729
	OHVI	11,074
	SS3	12
	SWI	43
	SS10	318
North Coast	AGE	2,578
	AGI	512
	OHVI	4,523
	SS3	18
	SWI	79
	SS10	623
Northeast	AGE	2,730
	AGI	974
	OHVI	12,721
	SS3	Zero due
	SWI	56
	SS10	726
Orange County	AGE	1,579
	AGI	358
	OHVI	1,085
	SS3	49
	SWI	31
	SS10	376
Total:		<u>62,510</u>

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 2005 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 30th day of June 2006 at San Diego, California.

By: 

Martha C. Ulloa



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

June 30, 2006

PUG 100
R.96-11-004

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

Re: SDG&E's General Order 165 – 2005 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 (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 me at (858) 654-1779

Sincerely,

Martha C. Ulloa for

Billie Overturf
Regulatory Information Manager

Cc: Parties of record in R.96-11-004