



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

June 30, 2010

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

Brian Schumacher
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 –
2009 Annual Corrective Maintenance Report**

Dear Brian:

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,

A handwritten signature in cursive script that reads 'Martha Cendias 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 2009 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 2010 at San Diego, California.

By: Martha Cendejas

Martha Cendejas



GENERAL ORDER 165
CORRECTIVE MAINTENANCE PROGRAM

REPORT FOR

2009

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, 2009 through December 31, 2009.

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. The CMP uses the Distribution Inspection Maintenance System (DIMS) 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 2009 Year-end Report

In a letter dated November 9, 2007 to Paul Clanon, Executive Director, California Public Utilities Commission (CPUC), SDG&E requested temporary relief from the inspection and repair requirements of its General Order 165 program (see Appendix A). This request was due to the extensive damage caused by the October/November 2007 firestorm. In the months following the firestorm, SDG&E dedicated the majority of its resources toward the restoration of power to its customers and to repairing fire damage to its electric distribution and transmission systems. SDG&E proposed resuming its maintenance program by May 1, 2008, and noted that it expected to complete the backlog of repair work and be in full compliance with inspection cycles by December 2009. In a letter dated December 11, 2007, Paul Clanon approved SDG&E's request (see Appendix B).

SDG&E began transitioning toward more normal maintenance operations during the first quarter of 2008 and expected to be in full compliance with its regular GO 165 CMP by December 2009. As previously stated in the

2008 report, SDG&E is pleased to note that as of June 1, 2009, SDG&E has completed 100% of the Urban Patrol Cycle, 100% of the Rural Patrol Cycle, and 100% of all Detailed Inspection Cycle requirements for 2007 and 2008.

SDG&E continues to have the goal of correcting infractions found during GO165 inspections within a 12-month time frame, 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 time frame, relative to the severity of the infraction and the nature of the hazard. Third party infractions that are out of the control of SDG&E, such as those involving private property owners, environmental issues and other utilities' issues may require more than the 12-month time frame to resolve. Pending infractions such as these are placed in the "Deferred" category and are tracked by SDG&E's Compliance Management Department, Vegetation Management, Land Management, and the Construction & Operation (C&O) Centers. These departments continue to refine the process for resolving third party infractions, as outlined in Appendix C. Facilities that are considered for and granted deferral status must meet strict internal requirements.

To ensure compliance with GO 165 inspection requirements and SDG&E's 12-month (from the month of inspection) time frame to correct infractions and/or required maintenance, SDG&E has developed a centralized Quality Assurance Program. The program reviews inspections and repairs to verify that infractions are identified and corrected accurately.

SDG&E GENERAL ORDER 165

MAINTENANCE

2009 REPORT

CPUC 2009 Yearend Report

<i>District</i>	<i>Inspect Type</i>	<i>Total Structures</i>	<i>Total Structures Scheduled for Inspection in 2009</i>	<i>Percent Structures Scheduled for Inspection in 2009</i>	<i>Total Structures Inspected in 2009</i>	<i>Percent Scheduled and Inspected in 2009</i>	<i>Structures Inspected in 2008, Cleared in 2009</i>	<i>Structures Inspected in 2009, Cleared in 2009</i>	<i>Structures Inspected in 2009, pending</i>
<i>Beach Cities</i>									
	AGE	12,973	3,036	23.40%	3,036	100%	4	2,938	1
	AGI	4,613	994	21.55%	994	100%	0	923	0
	OHVI	21,976	3,836	17.46%	3,836	100%	990	1,007	784
	POIN	22,618	218	0.96%	218	100%	0	20	10
	SS3	271	71	26.20%	71	100%	0	60	0
	SWI	439	137	31.21%	137	100%	2	132	2
<i>Eastern</i>									
	AGE	11,086	2,862	25.82%	2,862	100%	78	1,593	131
	AGI	2,807	624	22.23%	624	100%	18	421	33
	OHVI	58,757	12,145	20.67%	12,145	100%	3,976	3,282	3,391
	POIN	58,673	366	0.62%	366	100%	0	26	4
	SS3	32	11	34.38%	11	100%	0	3	2
	SWI	104	33	31.73%	33	100%	4	26	1
<i>Metro</i>									
	AGE	13,462	3,826	28.42%	3,826	100%	93	3,478	86
	AGI	3,683	792	21.50%	792	100%	28	728	24
	OHVI	42,334	8,826	20.85%	8,826	100%	2,702	4,113	2,093
	POIN	43,871	233	0.53%	233	100%	0	10	13
	SS3	534	94	17.60%	94	100%	20	80	1
	SWI	423	78	18.44%	78	100%	7	53	2
<i>North Coast</i>									
	AGE	20,358	4,782	23.49%	4,782	100%	474	4,426	96
	AGI	3,784	770	20.35%	770	100%	106	675	15
	OHVI	23,677	5,137	21.70%	5,137	100%	1,451	2,090	1,618
	POIN	24,201	50	0.21%	50	100%	31	3	3
	SS3	72	19	26.39%	19	100%	1	17	2
	SWI	230	68	29.57%	68	100%	29	68	0
<i>Northeast</i>									
	AGE	22,752	5,306	23.32%	5,306	100%	193	4,684	102
	AGI	4,851	1,131	23.31%	1,131	100%	66	989	16
	OHVI	64,001	13,539	21.15%	13,539	100%	3,920	4,591	3,044
	POIN	64,288	35,849	55.76%	35,849	100%	368	2,851	1,880
	SS3	6	3	50.00%	3	100%	0	3	0
	SWI	217	53	24.42%	53	100%	7	43	2
<i>Orange County</i>									
	AGE	10,926	2,763	25.29%	2,763	100%	105	2,383	168
	AGI	2,075	502	24.19%	502	100%	23	421	11
	OHVI	5,634	1,177	20.89%	1,177	100%	113	486	112
	POIN	5,733	89	1.55%	89	100%	41	30	0
	SS3	215	49	22.79%	49	100%	0	48	0
	SWI	129	28	21.71%	28	100%	4	24	3

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 facilities scheduled for inspection in 2010 are included as Appendix D, 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.

All equipment, on a given structure is inspected at the same time and the inspection record is documented in the structure record. The Corrective Maintenance Program (CMP) goals for the year historically were determined by the system-wide counts of facilities in each inspection type, divided by the number of years in the cycle length. Thus, the CMP goals are determined by the last inspection date. SDG&E's CMP cycles are designed to exceed or adhere to GO 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, pole-mounted facilities with primary and secondary conductors, and distribution equipment on transmission poles. These inspections identify conditions out of compliance with GO95. 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 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 GO128. 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 GO128. 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. 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.

SUBSURFACE, NO EQUIPMENT (Not Required by GO 165)

- SS10 (Subsurface, 10-year)

Subsurface enclosures, vaults, hand-holes and manholes without equipment are not required to be inspected under GO 165. 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.

SWITCH

- SW3 (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 the DIMS. The laboratory performs analysis of oil samples for low dielectric strength and high water content. These results and the inspection records are stored in DIMS. The status of "Do Not Operate Energized" (DOE) switches for prioritizing replacements are also tracked in DIMS. 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 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 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 drive by, fly by, or walk-by inspection of every applicable overhead, underground and streetlight facility in urban areas. Under SDG&E's 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 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 a drive by, fly by, or walk-by 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 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				
Transformers					N/A	N/A
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					N/A	N/A
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					N/A	N/A
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	N/A	N/A
Street Lighting	Patrol1	Patrol2	N/A	N/A	N/A	N/A
Wood Poles under 15 years	Patrol1	Patrol2	N/A	N/A	N/A	N/A
Wood Poles over 15 years which have not been subject to intrusive inspection	Patrol1	Patrol2	N/A	N/A	Wood Pole Intrusive 10	Wood Pole Intrusive 10
Wood Poles which passed intrusive inspection	N/A	N/A	N/A	N/A	Wood Pole Intrusive 20	Wood Pole Intrusive 20

PROGRAM CYCLE SUMMARY

Program Cycle	Cycle Interval	Start Year
Overhead Visual	5	1998
Above Ground Dead-front (AGE)	5	1998
Above Ground Live-front (AGI)	5	1998
Subsurface (SS3)	3	1998
Switches; Oil & Gas (SW3)	3	1998
Intrusive Wood Pole Insp. (POIN)	10	1998
Patrols Urban	1	1998
Patrol Rural	2	1998

EQUIPMENT DETAIL OVERHEAD
Overhead Distribution System
Overhead Visual

Distribution Poles & Distribution Equipment	Inspection Program (in years)			
	Patrol		Detailed	Intrusive
	Urban	Rural		
Pole	1	2	5	10, 20
Double Pole	1	2	5	10, 20
Pole Stub	1	2	5	10, 20
Cross-arm	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 Dead-front (AGE)

UG Distribution Structure & Distribution Equipment	Inspection Program (in years)		
	Urban	Patrol Rural	Detailed
Pad Structure - D Facility ID			
Pad with no Equipment	1	2	5
Pad with following Equipment	1	2	5
• 1 Phase Transformer (Dead)	1	2	5
• 3 Phase Transformer (Dead)	1	2	5
• Auto Throw Over	1	2	5
• Service Restorer	1	2	5
• Boost/Buck Station (Dead)	1	2	5
• Step Up/Down Station (Dead)	1	2	5
• Regulator (Dead)	1	2	5
Manhole - W or Y Facility ID			
Manhole with following Equipment	1	2	5
• 1 Phase Transformer (Dead)	1	2	5
• 3 Phase Transformer (Dead)	1	2	5
Primary Handhole - B or W Facility ID			
Primary Handhole with no Equipment	1	2	5
Primary Handhole with following Equipment	1	2	5
• 1 Phase Transformer (Dead)	1	2	5
• 3 Phase Transformer (Dead)	1	2	5
• Auto Throw Over	1	2	5
Subsurface Enclosure- S Facility ID			
Subsurface Enclosure with no Equipment	1	2	5

EQUIPMENT DETAIL ABOVE GROUND LIVEFRONT (AGI)
Underground Distribution System
Above Ground Live-front (AGI)

UG Distribution Structure & Distribution Equipment	Inspection Program (in years)		
	Urban	Patrol Rural	Detailed
Pad Structure - D Facility ID			
Pad with following Equipment	1	2	5
• Non-Oil/Gas Switch	1	2	5
• Non-Oil/Gas Group Switch	1	2	5
• 1 Phase Transformer (Live)	1	2	5
• 3 Phase Transformer (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/Down Station (Live)	1	2	5
• Regulator (Live)	1	2	5
Manhole - W or Y Facility ID			
Manhole with following Equipment	1	2	5
• Non-Oil/Gas Switch	1	2	5
• Non-Oil/Gas Group Switch	1	2	5
• 1 Phase Transformer (Live)	1	2	5
• 3 Phase Transformer (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 Equipment	1	2	5
• Terminator	1	2	5
Primary Handhole - B or W Facility ID			
Primary Handhole w/following Equipment	1	2	5
• Non-Oil/Gas Switch	1	2	5
• Non-Oil/Gas Group Switch	1	2	5
• 1 Phase Transformer (Live)	1	2	5
• 3 Phase Transformer (Live)	1	2	5
• Fuse Cabinet	1	2	5

EQUIPMENT DETAIL ABOVE GROUND LIVEFRONT (AGI)
Underground Distribution System
Above Ground Live-front (AGI) (Cont.)

UG Distribution Structure & Distribution Equipment	Inspection Program (in years)		
	Urban	Patrol Rural	Detailed
Primary Handhole - 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 Equipment	1	2	5
• 1 Phase Transformer (Dead or Live)	1	2	5
• 3 Phase Transformer (Dead or Live)	1	2	5
• Terminator	1	2	5
• Cable Tap with AGI Equipment	1	2	5
• Step Up/Down Station	1	2	5

EQUIPMENT DETAIL SUBSURFACE 3
Underground Distribution System
Subsurface 3

UG Distribution Structure& Distribution Equipment	Inspection Program (in years)		
	Urban	Patrol Rural	Detailed
Manhole - M Facility ID			
Manhole with following Equipment	1	2	3
• Non-Oil/Gas Switch			3
• Non-Oil/Gas Group Switch			3
• 1 Phase Transformer (Dead or Live)			3
• 3 Phase Transformer (Dead or Live)			3
• Fuse Cabinet			3
• Auto Throw Over			3
• Cable Tap with SS3 equipment			3
Primary Handhole - H Facility ID			
Primary Handhole with following Equipment	1	2	3
• Non-Oil/Gas Switch			3
• Non-Oil/Gas Group Switch			3
• 1 Phase Transformer (Dead or Live)			3
• 3 Phase Transformer (Dead or Live)			3
• Terminator			3
• Step Up/Down Station			3
• Service Restorer			3
• Cable Tap with Subsurface 3 Equipment			3
Vault- U Facility ID			
Vault with following Equipment	1	2	3
• Non-Oil/Gas Switch			3
• Non-Oil/Gas Group Switch			3
• 1 Phase Transformer (Dead or Live)			3
• 3 Phase Transformer (Dead or Live)			3
• Fixed Capacitor			3
• Switched Capacitor			3
• Fuse Cabinet			3
• Step Up/Down Station			3
• Auto Throw Over			3
Subsurface Enclosure- S Facility ID			
Subsurface Enclosure containing	1	2	3
• Non-Oil/Gas Switch			3
• Non-Oil/Gas Group Switch			3
• 1 Phase Transformer (Dead or Live)			3
• 3 Phase Transformer (Dead or Live)			3

EQUIPMENT DETAIL SUBSURFACE 10
Underground Distribution System
Subsurface 10

UG Distribution Structure & Distribution Equipment	Inspection Program (in years)		
	Urban	Patrol Rural	Detailed
Manhole - W or Y Facility ID			
Manhole with no Equipment	1	2	10
Manhole - M Facility ID			
Manhole with no Equipment	1	2	10
• Manhole with following Equipment	1	2	10
• Cable Tap with no Equipment			10
Primary Handhole - H Facility ID			
Primary Handhole with following Equipment	1	2	10
• Cable Tap with no Equipment			10
Vault - U Facility ID			
Vault with following Equipment	1	2	10
• Cable Tap with no Equipment			10
Subsurface Enclosure- S Facility ID			
Subsurface Enclosure with following Equipment	1	2	10
• Cable Tap with no Equipment			10

EQUIPMENT DETAIL OIL & GAS SWITCHES
Underground Distribution System
Oil and Gas Switches

UG Distribution Structure & Distribution Equipment	Inspection Program (in years)		
	Urban	Patrol Rural	Detailed
Manhole - W or Y Facility ID			
Manhole with following Equipment	1	2	3
• Oil/Gas Switch	1	2	3
• Oil/Gas Group Switch	1	2	3
Manhole - M Facility ID			
Manhole with following Equipment	1	2	3
• Oil/Gas Switch			3
• Oil/Gas Group Switch			3
Primary Handhole - B or W Facility ID			
Primary Handhole with following Equipment	1	2	3
• Oil/Gas Switch	1	2	3
• Oil/Gas Group Switch	1	2	3
Primary Handhole - H Facility ID			
Primary Handhole with following Equipment	1	2	3
• Oil/Gas Switch			3
• Oil/Gas Group Switch			3
Vault - U Facility ID			
Vault with following Equipment	1	2	3
• Oil/Gas Switch			3
• Oil/Gas Group Switch			3
Subsurface Enclosure- S Facility ID			
Subsurface Enclosure with following Equipment	1	2	3
• Oil/Gas Switch			3
• Oil/Gas Group Switch			3

APPENDIX A

SDG&E'S General Order 165 Relief Request Letter



Lee Schavrien
Senior Vice President
Regulatory Affairs

8330 Century Park Court, CP33C
San Diego, CA 92123-1530
Tel: 858-650-4090
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LSchavrien@SempraUtilities.com

November 9, 2007

Paul Clanon
Executive Director
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: SDG&E's Request For Temporary Relief From Requirements of General Order 165

Dear Mr. Clanon:

During the week of October 22, 2007, large portions of San Diego County were devastated by wild fires that destroyed thousands of acres of land, homes and structures. SDG&E's transmission and electric distribution system sustained a substantial amount of damage and tens of thousands of customers experienced power outages. Our crews, with the assistance of mutual aid and contract crews, have been working diligently to repair and rebuild our system, which will enable SDG&E to restore power to all of its customers.

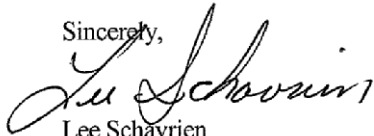
SDG&E has committed all its construction resources toward the repairing, rebuilding and restoration process. This includes inspectors and repair crews that normally would be used in SDG&E's General Order 165 Corrective Maintenance Program. SDG&E anticipates that it will need to dedicate its Corrective Maintenance personnel to the restoration process for the next three to four months. Accordingly, SDG&E is requesting relief from the inspection and repair requirements of General Order 165 for up to six months.¹ Our 2007 report will reflect our corrective maintenance compliance up until November of 2007. Such relief will allow SDG&E to concentrate on repairing, rebuilding and restoring its fire-damaged system.

SDG&E proposes to resume General Order 165 inspections on May 1, 2008, and expects to complete the backlog of repair work and be in full compliance with the inspection cycles by December 2009. This timeframe will allow SDG&E to comply with General Order 165 in a cost efficient manner. Attempting to catch up in less time would result in significant increases in labor costs.

Prior to the 2007 Firestorm, SDG&E was in complete compliance with the inspection cycles of General Order 165. The same was true prior to the 2003 Firestorm.

Should you have any questions, please contact Howard Levin at (858) 637-3724.

Sincerely,



Lee Schavrien
Senior Vice President – Regulatory Affairs

cc: Richard Clark, Director - CPSD
Sean Gallagher, Director - Energy Division
Brian Schumacher, Supervisor - Energy Division
Raffy Stepanian, Branch Chief - CPSD
Mark Ziering, CPSD
Caroline Winn, Director - SDG&E

¹ On November 13, 2003, following the 2003 Firestorm, SDG&E issued a similar request for relief from the requirements of General Order 165 that was subsequently approved by the CPUC.

APPENDIX B

CPUC Approval Letter

STATE OF CALIFORNIA

ARNOLD SCHWARZENEGGER, Governor

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

December 11, 2007

Lee Schavrien
Senior Vice President – Regulatory Affairs
San Diego Gas and Electric Company
8330 Century Park Court
San Diego, CA 92123-1550

**Re: SDG&E's Request for Temporary Relief from
Requirements of General Order 165**

Dear Mr. Schavrien,

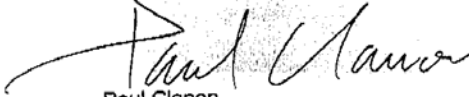
In a November 9, 2007 letter, San Diego Gas and Electric Company (SDG&E) requests a temporary relief from the inspection and repair requirements of General Order (GO) 165 for up to six months.¹ During the week of October 22, 2007, large portions of San Diego County were devastated by wildfires. SDG&E's transmission and electric distribution system sustained a substantial amount of damage. Subsequently, SDG&E states that it has committed all of its construction resources toward the repairing, rebuilding, and restoration process. This includes inspectors and repair crews that normally would be used in SDG&E's GO 165 Corrective Maintenance Program.

SDG&E also states that it anticipates that it will need to dedicate its Corrective Maintenance personnel to the restoration process for the next three to four months. SDG&E's GO 165 2007 report will reflect its corrective maintenance compliance up until November of 2007. SDG&E states that such relief will allow it to concentrate on repairing, rebuilding, and restoring its fire-damaged system. This will presumably ensure a safer and more reliable electric system than if this was not completed in an expedient manner. SDG&E proposes to resume GO 165 inspections on May 1, 2008, and expects to complete the backlog of repair work and be in full compliance with the inspection cycles by December 2009. SDG&E states that this timeframe will allow it to comply with GO 165 in a cost efficient manner, balance its use of resources, and not drive up future costs.

¹ On November 13, 2003, following the 2003 Firestorm, SDG&E issued a similar request for relief from the requirements of GO 165 that was subsequently approved by the CPUC.

For good cause shown, I grant SDG&E temporary relief from the requirements of GO 165. If you have any questions concerning this matter, please contact Brian Schumacher of the CPUC's Energy Division staff at 415-703-1226 (bds@cpuc.ca.gov).

Sincerely,



Paul Clanon
Executive Director,
California Public Utilities Commission

cc: Richard Clark, Director - CPSD
Sean Gallagher, Director - Energy Division
Brian Schumacher, Supervisor - Energy Division
Raffy Stepanian - Branch Chief - CPSD
Mark Ziering, CPSD
Caroline Winn, Director - SDG&E

307334

TOTAL P.03

APPENDIX C

SDG&E THIRD PARTY

INFRACTION

PROCESS

Third Party Infraction Process

Third Party (e.g. telecommunications companies, cable television companies, and private property owners) infractions are an ongoing issue that SDG&E has dealt with since the implementation of GO 165. On a daily basis, Overhead and Underground Inspectors encounter GO 95 and 128 infractions caused by telecommunications companies, cable television companies, and/or private property owners. For example, on overhead poles, telecommunications companies will install communication service drops in the area designated/reserved by GO 95 as "Climbing Space". Also, a large number of private property owners try to make underground pad-mounted equipment more cosmetically aesthetic by surrounding them with retaining walls and/or locating vegetation in front of such pad-mounted equipment. Many of these customers do not understand that their attempts to cover up our equipment violate the GO 128 workspace rules and may also make the equipment inaccessible for operations, inspections and/or repairs.

Once SDG&E is aware of a GO violation caused by a Third Party, action is taken as soon as reasonably possible to notify the Third Party of its infraction. To accomplish such a notice, SDG&E developed a Request for General Order Correction Program procedure that gives notification to the violating Third Party and requires that the infraction be resolved within 90 days. Many Third Parties, however, are either unable or unwilling to resolve the infraction within the 90 day period. In such instances, SDG&E attempts to continue working with the Third Party so as to eventually achieve compliance. Since Third Parties are not subject to the same maintenance compliance and reporting standards imposed on SDG&E, it is often difficult to convince Third Parties that they cannot maintain their property in a manner that violates GO 95 or GO 128.

Moreover, since many of these infractions are caused by property owned by Third Parties (e.g. a misplaced retaining wall or equipment owned by the telecommunications or cable television companies), SDG&E is unable to resolve the infraction without obtaining the cooperation of the offending Third Party. If the offending Third Party ignores SDG&E's notice or simply does not cooperate in resolving the issue, the infraction remains outstanding and may take well over 90 days to resolve.

In 2009, Compliance Management through SDG&E's GO 165 Corrective Maintenance Program Request for General Order Correction Program processed 2,225 infractions through Third Party Request for GO Correction Forms (previously referred to as Investigation Orders). Of the 2,225 notices of infractions issued, 2,023 were sent to Communication Infrastructure Providers (CIPs), and 202 were issued to private property owners. Third Parties resolved only 450 while 1,775 of these infractions remained outstanding as of December 31, 2009. There were 1,757 additional infractions still pending as of December 31, 2009 which were noticed in 2008. This large number of unresolved infractions from 2008 and 2009, a total of 3,532, negatively impacts the operation and overall safety of the electric system.

By attempting to educate our customers and working with other utilities that build their infrastructure in close proximity to our electric underground facilities or on jointly used overhead poles, SDG&E is striving to reduce the number of Third Party GO 95 and 128 violations found during the GO 165 detailed inspection cycles. Thus, by implementing the Request for General Order Correction Program procedure, SDG&E's vision is to reduce the number of Third Party infractions over time, which will also improve the level of safety for the public and utility workers, as well as improve system reliability.

APPENDIX D

SDG&E'S GENERAL ORDER 165

MAINTENANCE SCHEDULE

FOR 2010

District	Inspection Type	2010 Inspections Required
Beach Cities	AGE	2,421
	AGI	813
	OHVI	4,431
	SS3	105
	SWI	149
Metro	AGE	2,422
	AGI	651
	OHVI	8,527
	SS3	182
	SWI	157
Eastern	AGE	1,969
	AGI	448
	OHVI	11,873
	SS3	9
	SWI	31
North Coast	AGE	4,212
	AGI	882
	OHVI	4,960
	SS3	29
	SWI	82
Northeast	AGE	4,650
	AGI	904
	OHVI	11,800
	SS3	3
	SWI	102
Orange County	AGE	2,050
	AGI	353
	OHVI	1,136
	SS3	134
	SWI	62

Division Total:

65,547

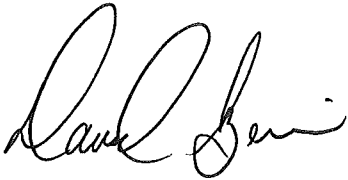
OFFICER VERIFICATION

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 2009 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 29th day of June, 2010, in San Diego, California.

A handwritten signature in black ink, appearing to read "David L. Geier". The signature is fluid and cursive, with the first name "David" being larger and more prominent than the last name "Geier".

David L. Geier

Vice President of Electric Operations

San Diego Gas & Electric Company