



GENERAL ORDER 165

**ELECTRIC DISTRIBUTION
CORRECTIVE MAINTENANCE PROGRAM**

REPORT FOR 2025

July 1, 2026

Introduction

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, which covers the period from January 1, 2025 through December 31, 2025.

SDG&E's GO 165 compliance program is called the Corrective Maintenance Program (CMP) and is managed by SDG&E's Program Management Group. Through coordination with the Construction & Operations (C&O) Centers, Electric Supervisors, Inspectors, Linemen, and other personnel, the inspections required by GO 165 are performed along with any corrective work.

Verification of Counts

In 2025, SDG&E continued to utilize the automated interface in place between GIS (SDG&E's system of record for facilities) and SAP-PM (SDG&E's system of record for inspection and maintenance records). This interface evaluates every SDG&E facility to verify that an appropriate inspection plan is assigned to it. Periodic reviews are conducted to ensure that the automated interface is working according to plan. In addition to the interface, automated reports are published weekly showing the year-to-date status of all CMP Detailed Inspections and Patrols scheduled for the year.

For intrusive inspections, the number of the intrusive inspections due in 2025 was calculated by comparing the wood poles due for a 10-year inspection, less the number of inspections completed as a "special" inspection within the last 5 years. In addition, periodic reviews are conducted throughout the year to ensure all poles requiring an intrusive inspection are completed in accordance with GO 165 and SDG&E's Corrective Maintenance Program.

Summary of the 2025 Year-end Report

SDG&E General Order 165 Maintenance 2025 Electric Distribution Inspections Report

Type of Inspection by Facility	Facilities Complete	Facilities Outstanding as of 12/31/2025
Overhead Detailed	46,678	0
Underground Detailed	25,933	0
Wood Pole Intrusive	13,357	88
Type of Inspection by Grid	Grids Complete	Grids Outstanding
Patrols	26,989	0

In 2025, SDG&E confirms that a total of 26 overhead detailed inspections, five underground detailed inspections, 295 wood pole intrusive inspections and one patrol inspection grid were completed late per the GO 165 guidelines. Please note that a patrol grid described a map area and contains multiple distribution electric facilities. Therefore, the number of patrol grids does not provide the number of facilities inspected. The late and outstanding wood pole intrusive inspections were associated with access challenges, permitting delays, and environmental considerations. While certain wood pole intrusive inspections exceeded the routine 10-year interval, all inspections remain within the maximum 20-year GO 165 compliance requirement, and completion of outstanding wood pole intrusive inspections are prioritized for 2026. Please note that late inspections are those completed after the GO 165 interval, while outstanding inspections are those not completed as of 12/31/2025.

SDG&E continues to utilize our asset integrity interface to assign each facility to an appropriate inspection plan. The system evaluates 100% of distribution assets to validate inspection plan assignment, supported by periodic reconciliation throughout the year and exception review processes. The periodic reconciliation and exception reviews are performed utilizing automated reports to track the progress of inspections and patrols and document completion within the appropriate interval timeframe.

Division of Inspections

The number of active electric distribution 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, and other changes to the electric distribution system. When new equipment is added, it is classified as inspected as of the date of installation. The new piece of equipment is then automatically scheduled for inspection during the next inspection cycle for the respective equipment type based on its functional location. Meaning that if the new equipment requires inspection every 5-years, but is located within a functional location where the same equipment is scheduled for inspection in 2 years, then that new piece of equipment would be inspected in 2 years with the other equipment in that location. This allows for more efficient scheduling of inspections at the required interval.

All equipment contained within or on a given structure is inspected at the same time and the inspection record is documented in the structure record. The CMP inspection targets for the year are determined by the last inspection date. SDG&E's CMP cycles are designed to adhere to or exceed GO 165 requirements. The following section describes SDG&E's CMP cycles by equipment type.

Description of SDG&E CMP Cycles

OHVI (Overhead Visual, Five-year)

This cycle consists of a detailed inspection of distribution poles, pole-mounted facilities with primary and secondary conductors, and distribution equipment on transmission poles. Drones or helicopters may also be utilized to perform these inspections. These inspections identify conditions that are out of compliance with GO 95 or SDG&E standards. This is a five-year inspection cycle

Above Ground 5 (Internal and External Inspections)

This cycle consists of Above Ground Dead-front (AGDF) and Above Ground Live-front (AGLF) detailed external and internal inspections of dead-front and live-front pad-mounted facilities to identify conditions that are out of compliance with GO 128 or SDG&E standards.

- AGDF (Above Ground Dead-front, Five-year)

This cycle consists of a detailed external and internal inspection of dead-front pad-mounted facilities to identify conditions out of compliance with GO 128 or SDG&E standards. The cycle is still named AGDF to separate the dead-front equipment data from live-front equipment data. This is a five-year inspection cycle.

- AGLF (Above Ground Live-front, Five-year)

This cycle consists of a detailed external and internal inspection of live-front pad-mounted facilities to identify conditions out of compliance with GO 128 or SDG&E standards. This is a five-year inspection cycle.

Subsurface with Equipment, SS3 (Subsurface, Three-year)

This cycle consists of a detailed inspection of subsurface structures (manholes, vaults, hand-holes and subsurface enclosures) containing distribution equipment, such as, but not limited to, switches, transformers, capacitors, and voltage regulators. Thus, structures with only cable taps, splices or pass-throughs are excluded as they do not contain equipment as described in GO 165. The

SS3 cycle consists of a detailed inspection of these facilities to identify conditions out of compliance with GO 128 or SDG&E standards. This is a three-year inspection cycle.

SDG&E also inspects facilities containing primary distribution cable with no equipment on a 10-year cycle. This data is not included in the GO 165 report.

Switch, SW3 (Oil or Gas Switch, Three-year)

This consists of a specialized inspection of all subsurface and pad-mounted oil and gas switches. Oil samples and gas pressure readings are obtained as needed and recorded in SAP. The laboratory performs analysis of oil samples for low dielectric strength and high-water content. These results and the inspection records are stored in SAP. The status of “Do Not Operate Energized” (DOE) switches for prioritizing replacements are also tracked in SAP and GIS mapping system. Other conditions out of compliance with GO 128 or SDG&E standards are also identified. This is a three-year inspection cycle.

Wood Pole Integrity (10 year/15 year with special)

Each pole is inspected visually and intrusively. This inspection occurs on a 10-year cycle with the exception of poles aged 15 years or more that have undergone a “special inspection” within the last 5 years as required by GO 95 Rule 44.2. For wood poles that have a passing intrusive “special” inspection within the last 5-years, the 10-year routine inspection would be deferred to the next cycle. So, a pole that has a previous passing intrusive inspection could be inspected at a 15-year interval. The method of intrusive inspection is normally a sound and bore of the pole at ground line and an excavation at the pole base (if conditions allow). Currently, if the pole testing results in eligibility for treatment, then chemical treatment is applied in the form of ground line pastes and/or internal biocide application during the inspection. Poles not eligible for treatment are poles that have failed the inspection and require replacement. The 10-year/15-year with special inspection cycle fulfills the requirements of GO 165, which are: (1) all poles over 15 years of age are intrusively inspected

within ten years; and (2) all poles which previously passed intrusive inspection are to be inspected intrusively again on a 20-year cycle. These are a 10-year inspection cycle, with exception for poles undergoing a special inspection.

During the course of the wood pole intrusive inspections, SDG&E's contractor will bore into the pole to determine if it needs reinforcement or replacement based on the remaining shell thickness and location. The choice to restore a pole rather than replace the pole is based on the strength of the pole (measured by remaining shell thickness) and compliance with SDG&E's internal standards and specifications. 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 and addresses a pole's suitability for steel reinforcement based on the remaining shell thickness for various lengths of pole and location. If a pole does not have sufficient shell thickness for steel reinforcement or is in a higher risk area, it is replaced.

The wood pole intrusive inspections are currently performed by an SDG&E contractor who also performs the chemical treatments and installs mechanical reinforcements (Steel Reinforcement) as needed. The type of treatment is dependent upon the age of the pole, the individual inspection history, the location of the pole and the overall condition of the structure.

Patrol 1 (urban patrol, one year)

The purpose of the urban patrol is to identify obvious structural problems and hazards. This cycle consists of a simple visual inspection of every applicable overhead, underground and streetlight facility in urban areas. Under agreement of interpretation with Commission Staff, "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 SAP.

This is a one-year inspection cycle.

Patrol 2 (rural patrol, one year)

The purpose of the rural patrol is to identify obvious structural problems and hazards. This cycle consists of a simple visual inspection of every applicable overhead, underground and streetlight facility in rural areas. Under agreement of interpretation with the CPUC, "rural" is defined as unincorporated areas (GO 165 defined "rural" as those areas with less than 1000 persons per square mile). GO165 defines a "patrol" as a "simple visual inspection, of applicable utility equipment and structures that is designed to identify obvious structural problems and hazards."

Consistent with D. 09-08-029, SDG&E conducts annual patrol inspections in rural areas, which include areas within SDG&E's designated Tier 2 and Tier 3 High Fire-Threat Districts as per D. 17-12-024 in R. 15-05-2006. When patrols have been completed, any identified structural problems and hazards are recorded in SAP. This is a one-year inspection cycle.

SDG&E CMP INSPECTION CYCLES

SDG&E Electric Distribution 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*	AGLF 5	AGLF 5		
Pad Mounted (dead front)	Patrol1	Patrol2*	AGDF 5	AGDF 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*	AGLF 5	AGLF 5		
Pad Mounted (dead front)	Patrol1	Patrol2*	AGDF 5	AGDF 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*	AGLF 5	AGLF 5		
Pad Mounted (dead front)	Patrol1	Patrol2*	AGDF 5	AGDF 5		
Overhead Conductors and Cables	Patrol1	Patrol2*	OHVI 5	OHVI 5		
Street Lighting	Patrol1	Patrol2*	x	x		
Wood Poles under 15 years	Patrol1	Patrol2*	OHVI 5	OHVI 5	Wood Pole Intrusive 10	Wood Pole Intrusive 10
Wood Poles over 15 years which have not been subject to intrusive inspection	Patrol1	Patrol2*	OHVI 5	OHVI 5	Wood Pole Intrusive 10	Wood Pole Intrusive 10
Wood Poles which passed intrusive Inspection within the past 5 years			OHVI 5	OHVI 5	Wood Pole Intrusive 15	Wood Pole Intrusive 15

*Patrol inspections conducted once per year within all of SDG&E's Service Territory, including within Tier 2 & Tier 3 of the High Fire-Threat District as per D.17-12-024 in R. 15-15-006.

OFFICER VERIFICATION

I, John Jenkins, 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 2025 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 based on my information and belief.

Executed this 26th of June 2026, in San Diego, California.

A handwritten signature in black ink, appearing to read "John D. Jenkins", with a stylized, cursive script.

John Jenkins

Vice President of Electric Operations, SDG&E