

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Rulemaking to implement the provisions of
Public Utilities Code § 761.3 enacted by
Chapter 19 of the 2001-02 Second
Extraordinary Legislative Session

Rulemaking 02-11-039

**PACIFIC GAS AND ELECTRIC COMPANY'S COMMENTS
ON REPORT ON COMMON LOGBOOK FORMAT
FOR THERMAL POWER PLANTS**

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May 23, 2005

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Pacific Gas and Electric Company ("PG&E") submits the following comments in response to the Administrative Law Judge's Ruling Setting Aside Submission for Comment Period Followed by Resubmission dated May 12, 2005 (May 12, 2005 Ruling), which requested comments on the potential modification of Ordering Paragraph (OP) 4 of Decision (D.) 04-05-017, as well as the report recently submitted by the Western Power Trading Forum regarding the feasibility of a common logbook format for thermal power plants in California.

The report submitted by the Western Power Trading Forum was prepared on behalf of an Ad Hoc Group of generating asset owners in California, which included PG&E. This Ad Hoc Group of generators retained Power Catalyst to review the existing logging systems used by generators in California and to provide recommendations regarding the potential for standardizing the logging systems. PG&E participated in the evaluation conducted by Power Catalyst and supports the conclusions contained in its report. In particular, PG&E concurs that it is not feasible to require generating asset owners to standardize their logging systems or to provide the Commission with remote electronic access to existing logbook systems maintained by the generators. Rather, as the report concludes, the Commission's information needs can be met more effectively and efficiently through the generators' reporting of data to the Commission in a common standardized format.

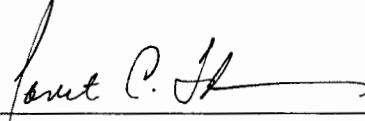
PG&E also supports the suggestion in the May 12, 2005 Ruling that the second sentence of OP 4 of D. 04-05-017 be changed to, "Within 12 months of the date this decision is mailed,

respondents shall *serve a report* which contains” The report submitted by the Western Power Trading Forum adequately addresses the questions raised by the Commission in its D. 04-05-017. It is not necessary for the respondents to file an application, as originally contemplated in D. 04-05-017.

PG&E would like to thank the Commission for the opportunity to provide these comments. We urge the Commission to adopt the findings in the Power Catalyst report submitted by the Western Power Trading Forum, and to modify OP 4 of D. 04-05-017 as described in the May 12, 2005 Ruling.

Respectfully submitted,

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Dated: May 23, 2005

CERTIFICATE OF SERVICE
BY
ELECTRONIC MAIL


I, the undersigned, state that I am a citizen of the United States and am employed in the City and County of San Francisco; that I am over the age of eighteen (18) years and not a party to the within cause; and that my business address is 77 Beale Street, San Francisco, California 94105.

On May 23, 2005, I served true and correct copy of *Pacific Gas and Electric Company's Comments on Report on Common Logbook Format for Thermal Power Plants* on all parties identified on the electronic Service List for the California Public Utilities Commission Docket No. R.02-11-039.

Service was completed by serving said document, via electronic mail, to the parties who provided electronic mail addresses appearing on the Service List on the CPUC website for Docket No. R.02-11-039.

I certify and declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed in San Francisco, California on May 23, 2005.


ELIZABETH J. DIAMOND