

**PACIFIC GAS AND ELECTRIC COMPANY**

**Case Name**

**Case No.**

**Data Response**

PG&E Data Request No.:	DRA_02		
PG&E File Name:	AL4058-E		
Request Date:	June 22, 2012	Requester DR No.:	
Date Sent:	June 27, 2012	Requesting Party:	DRA
PG&E Witness:		Requester:	Hank Pielage

**SUBJECT: CONTRA COSTA-MORAGA #1 AND #2 230kV NERC PROJECT**

**QUESTION 1**

Please provide cites for the FERC and NERC requirements that are used as a basis for the proposed construction activities.

**ANSWER 1**

PG&E has performed engineering analyses of PG&E's existing transmission system in response to a Recommendation to Industry (also known as a NERC Alert) issued by the North American Electric Reliability Corporation (NERC). These analyses indicate that the construction activities that are the subject of Advice 4058-E are necessary to maintain these lines in accordance with NERC Reliability Standards as well as California Public Utilities Commission (CPUC) General Order (G.O.) 95 transmission line clearance requirements.

By way of background, on October 7, 2010, NERC issued a Recommendation to Industry (NERC Alert) to all Transmission Owners in North America such as PG&E requiring such Transmission Owners to verify that the "as built" conditions of their transmission lines allow them to be operated at current ratings. As part of this verification process, NERC directed Transmission Owners to: (1) determine if their ratings methodologies would produce appropriate ratings even when considering differences between design and field conditions; and (2) review their ratings to confirm that any differences observed between design and actual field conditions are within design tolerances as defined by their facility ratings methodology. NERC also gave Transmission Owners three years to complete this verification and a year from the date of discovery to correct any discrepancies, although Transmission Owners could request an extension of time to correct the discrepancies where necessary. PG&E prepared an Assessment Plan to comply with the NERC Alert, which has been approved by NERC. NERC has indicated in the NERC Alert that it will compile responses submitted under the NERC Alert and report them to the Federal Energy Regulatory Commission (FERC).

A copy of the October 7, 2010, NERC Alert is available at:

<http://www.nerc.com/fileUploads/File/Events%20Analysis/Ratings%20Recommendation%20to%20Industry%20FINAL-REVISED.pdf>

On October 19, 2011, PG&E held a briefing with staff in the CPUC's Consumer Protection and Safety Division on PG&E's efforts under the NERC Alert.