

From: Mee, Charles
Sent: 11/29/2012 10:03:07 AM
To: Sterkel, Merideth "Molly" (MeridethMolly.Sterkel@cpuc.ca.gov)
Cc:
Bcc:
Subject: FW: Data Request on AL 4058-E

Molly:

The following is the email after discussion with Redacted at PG&E.

From: Redacted
Sent: Tuesday, October 16, 2012 2:15 PM
To: Mee, Charles
Cc: Mulligan, Jack M.; Sher, Nicholas
Subject: RE: Data Request on AL 4058-E

Charles,

In my discussion with you this morning you identified that the line of questions you are asking that PG&E address go to justifying the need for the project. No language in GO-131-D suggests that Commission staff's review of an NOC requires a finding of need, and the Commission has repeatedly rejected protests that go beyond the narrow grounds set by GO 131-D, section XIII. As noted in our response to the DRA protest, only two circumstances would allow a protest of an NOC to be sustained: (1) where the protest establishes that the utility has incorrectly applied an exemption or (2) when one of three special conditions listed in GO 131-D, Section III.B.2 exist such that the Project could result in significant environmental impacts, thereby rendering the claimed exemption inapplicable. (See, e.g., Res. E-3460 (July 1, 1996); Res. E-3789 (October 30, 2002); Res. E-4243 (November 20, 2009); Res. E-4360 (August 13, 2010).) Even in the case of permit to construct proceedings, the Commission does not require utilities to demonstrate the need for the project. (See, e.g., D. 10-06-014 at 5-6, 2010 Cal. PUC LEXIS 201 at *7 ("GO 131-D does not require PTC applications for electric power lines to include an analysis of purpose and necessity, an estimate of cost and an economic analysis, a schedule or an in-depth description of construction methods beyond that required for CEQA compliance.")). It makes even less sense to require a demonstration of need for small-scale, low-cost NOC projects like this – and none is required under GO 131-D.

While PG&E has identified for Staff the reason that PG&E is implementing the project and we are happy to discuss it with your further, for purposes of issuing a resolution on this matter we do not believe that Staff's review requires a finding of need.

Thanks,

Redacted

From: Mee, Charles [mailto:charles.mee@cpuc.ca.gov]
Sent: Tuesday, October 16, 2012 9:56 AM
To: [Redacted]
Cc: Mulligan, Jack M.; Sher, Nicholas
Subject: RE: Data Request on AL 4058-E

Jason:

Start from Thursday, October 18, 2012, I will be on vacation for about one month. So I am including Jack and Nicholas for this communication. When I am on vacation, I hope they can continue to work on this AL.

I am available today, how about this morning ASAP?

Thank you!

Charles Mee, P.E. -- Electrical
Senior Utilities Engineer (Specialist)
Energy Division
California Public Utilities Commission
charles.mee@cpuc.ca.gov
415-703-1816

From: [Redacted]
Sent: Tuesday, October 16, 2012 9:51 AM
To: Mee, Charles
Subject: RE: Data Request on AL 4058-E

Charles,

I wonder if it would be helpful for me to get you in contact with either our project manager or one of the engineers to help explain the issue. I can describe the issue generally, but the technical staff should be able to run through an example with you. Are you available today to discuss?

Thanks,

-Jason

From: Mee, Charles [<mailto:charles.mee@cpuc.ca.gov>]
Sent: Monday, October 15, 2012 4:15 PM
To: [Redacted]
Cc: Sher, Nicholas; Mulligan, Jack M.
Subject: RE: Data Request on AL 4058-E

Jason:

Regarding the GO 95 Rule 43 is a general rule under which “temperature and loading shall be used for the purposes of these rules in determining the strength required of poles, towers, structures, and all parts thereof and in determining the strength and clearances of conductors.”

How did you violate the GO 95 Rule 43? Have you used the wrong temperature and loading to develop transmission rates, or you don't know yet? Can you provide me an example with numbers to help me understand what was going on? To the extent the transmission rate was wrongly calculated, why does that lead you to file the proposed project?

Reading the NERC Alert, my understanding is that NERC requires you to assess the transmission rating of the existing transmission line to make sure you don't mistakenly rate your transmission line. I don't see a connection between that alert to the construction you are proposing.

Thank you!

Charles Mee, P.E. -- Electrical

Senior Utilities Engineer (Specialist)

Energy Division

California Public Utilities Commission

charles.mee@cpuc.ca.gov

415-703-1816

From: Redacted
Sent: Monday, October 15, 2012 2:32 PM
To: Mee, Charles
Cc: Sher, Nicholas; Mulligan, Jack M.
Subject: RE: Data Request on AL 4058-E

Charles,

Below please find PG&E's response to your questions. Please let me know if I can help any further.

Thanks,

Redacted

1) Please provide your supporting details on which GO 95 rules and the NERC clearance requirements the existing transmission facility is violating.

GO 95 Rule 43 for “Temperature and Loading” indicates to check the sag at 130 degrees F as maximum temperature with the assumption that the lines are being operated at this temperature. This only addresses specific conductor types. PG&E is checking our circuits and checking the sag at maximum operating temperatures provided by the conductor manufacturer. The results of these calculations for sag will determine the maximum operations rating for the circuit under GO 95 Rule 43.

PG&E’s efforts are not in response to a NERC Reliability Standard; instead PG&E is responding to a NERC Recommendation to Industry sent to all utilities on October 7, 2010. This Recommendation to Industry requires that PG&E verify the as-built condition of transmission line facilities. Pursuant to this NERC Recommendation to Industry, PG&E has committed to NERC to assess 2,700 miles in 2011, 5,500 miles in 2012 and 4,350 miles in 2013. The approach being taken is to LiDAR survey, PLS CADD model these circuits and verify their ground clearance at the maximum load condition using CPUC General Order (GO) 95 as the measure for required clearance.

2) Please also include any communications with CPUC and/or NERC that lead to your believe.

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). Please find attached a copy of the October 7, 2010, NERC Alert.

PG&E has performed engineering analyses of PG&E’s existing transmission system in

response the October 7, 2010 NERC Alert. These analyses indicate that the construction activities that are the subject of Advice 4058-E are necessary to ensure compliance going forward for these lines in accordance with California Public Utilities Commission (CPUC) General Order (G.O.) 95 transmission line clearance requirements as described in the response to question 1 above.

From: Mee, Charles [<mailto:charles.mee@cpuc.ca.gov>]
Sent: Wednesday, October 10, 2012 1:45 PM
To: [Redacted]
Cc: Sher, Nicholas; Mulligan, Jack M.
Subject: Data Request on AL 4058-E

Jason:

In your filing, you said you are raising the height of 20 lattice steel towers to comply with GO95 and NERC ground-to-conductor clearance requirements.

- 1) Please provide your supporting details on which GO 95 rules and the NERC clearance requirements the existing transmission facility is violating.
- 2) Please also include any communications with CPUC and/or NERC that lead to your believe.

Thank you!

Charles Mee, P.E. -- Electrical
Senior Utilities Engineer (Specialist)
Energy Division
California Public Utilities Commission

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415-703-1816

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