



**Pacific Gas and
Electric Company***

Redacted
Manager,
Transmission Compliance
Electric Operations

Redacted

August 27 2013

Mr. Raymond Fugere, P.E.
Program and Project Supervisor
California Public Utilities Commission
Electric Safety and Reliability Branch
Safety and Enforcement Division
320 West Fourth Street, Suite 500
Los Angeles, CA 90013

Reference: Letter from Mr. Raymond Fugere to Redacted, Dated July 29, 2013
General Order 174 Notice of Violation, CPUC ID: E20121101-01

Dear Mr. Fugere:

This letter is in response to the Notice of Violation (NOV) you sent on July 29, 2013 regarding the Electric and Communication Facilities Safety Section (ECFSS) investigation of a November 1, 2012 PG&E electrical outage in Pleasanton, California. The media reportable incident originated at PG&E's Vineyard Substation during scheduled work.

ECFSS cited PG&E for a violation of General Order (GO) 174 because "the control center operators did not fully check system conditions of the electrical grid as prescribed by PG&E switching procedure" and "[i]f the PG&E operator had correctly marked switch 277 as open on the grid map when the procedure was being conducted by the electrical worker, the correct procedure to close switch 277 would have been completed before reenergizing the line".

PG&E acknowledges there was a switching error, but disagrees that that action constitutes a violation of GO 174 because: 1) GO 174 pertains to substation inspections and does not cover human performance errors; and 2) the facilities involved in the outage were 230 kV transmission facilities, which are exempt from GO 174 because they are subject to the California Independent System Operator's (CAISO's) operational control and subject to NERC reliability standards under FERC jurisdiction.

GO 174, Section 1, part 10: General Provisions, states in part:

10 Purpose

The purpose of these rules is to formulate, for the State of California, uniform requirements for substation inspection programs, the application of which will

promote the safety of workers and the public and enable adequacy of service.

The cause of this incident was a human performance error that occurred during the execution of an operations switch log by PG&E's Transmission System Operations (TSO) and the CAISO, and was not associated with any aspect of PG&E's substation inspection program.

GO 174, Section 1, part 11: General Provisions, states in part:

11 Applicability

This General Order applies to electric utilities subject to the jurisdiction of the California Public Utilities Commission (Commission).

Facilities subject to the California Independent System Operator's operational control and/or subject to FERC reliability standards and Customer Substations are exempt from this General Order.

The facilities involved in this incident, including Switch 277, are operated at 230,000 volts and are under the operational control of the California Independent System Operator (CAISO) and therefore are exempt from General Order 174.

Pacific Gas and Electric Company respectfully submits that the above referenced incident was not a violation of General Order 174.

Please contact me at Redacted if you have any questions regarding this response.

Sincerely,

Redacted

cc: Ms. Elizaveta Malashenko, Deputy Director, Office of Utility Safety and Reliability
Mr. Raffy Stepanian, Program Manager, CPUC/ESRB
Mr. Alok Kumar, Sr. Utilities Engineer, CPUC, ESRB
Mr. Ryan Yamamoto, Utilities Engineer, CPUC, ESRB
Redacted P.E., Manager Distribution Compliance, PG&E