

DIVISION OF RATEPAYER ADVOCATES
A.13-02-023 Energy Resource Recovery Acct 2012-Compliance
DRA Response to PG&E DR #3 (1st Partial Response)

Recipient	Division of Ratepayer Advocates		
PG&E Data Request No.:	PGE_DRA-003		
PG&E File Name:	EnerResourceRecoveryAcct2012-Compliance_DR_PGE_DRA-003/Q1		
Request Date:	September 9, 2013	PG&E Witness:	Redacted
Due Date:	September 16, 2013	DRA Witness:	Yakov Lasko

Question 3.1

Chapter 2 – PG&E’s Management of Utility-Owned Generation - Nuclear and Hydro (Yakov Lasko)

3.1. DRA has asserted (page 2-16 at line 15) that PG&E should have tested the low level oil switch when other instrumentation in the system was out of service. Is DRA aware of a standard industry practice that calls for such testing? If so, please provide that standard, including the level of inspection and/or testing required.

DRA Response

No, DRA is not aware of a standard industry practice that calls for such testing. DRA’s assertion is based on the expectation that a reasonable manager would have tested the low oil level alarm to ensure that it was functioning properly because it was the only alarm remaining in place to alert PG&E to a potential oil spill after the leak detection device was purposefully disabled.

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PG&E Data Request No.:	PGE_DRA-003		
PG&E File Name:	EnerResourceRecoveryAcct2010-Compliance_DR_PGE_DRA-003/Q2		
Request Date:	September 9, 2013	PG&E Witness:	Redacted
Due Date:	September 16, 2013	DRA Witness:	Yakov Lasko

Question 3.2

Chapter 2 – PG&E’s Management of Utility-Owned Generation - Nuclear and Hydro (Yakov Lasko)

3.2. Did DRA consider (page 2-20, line 23) the value of generation produced from water that was held back in Lake Almanor during the Belden outage and used to produce power after the Belden unit was returned to service?

DRA Response

No. PG&E did not provide the information necessary to conduct such a calculation as part of its application. Likewise, DRA is not privy to how PG&E’s dispatch decisions changed after the Belden unit was returned to service compared to PG&E’s planned dispatch decisions prior to the Belden unit forced outage.

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Question 3.3

Chapter 2 – PG&E’s Management of Utility-Owned Generation - Nuclear and Hydro (Yakov Lasko)

3.3. On page 2-14, lines 10-12, DRA concludes with respect to the Belden outage that “the magnitude of the duration and the impact of the forced outage would have been significantly diminished if at least one of the alarms had been operational.” Please itemize and explain any and all facts DRA used to arrive at its conclusion that the duration of the Belden forced outage would have been significantly diminished if the liquid leak detection alarm had been operational. Please itemize and explain any and all facts DRA used to arrive at its conclusion that the impact of the Belden forced outage would have been significantly diminished if the liquid leak detection alarm had been operational.

DRA Response

On page 2-15, line 17 of DRA’s testimony, DRA states that one of the reasons that contributed to the forced outage is an “equipment malfunction, not caused by human error or judgment.” Due to equipment malfunction in the leak detection device, the device was purposefully disabled because the Caribou was receiving frequent nuisance alarms and a component within the leak detection device needed to be replaced. DRA acknowledged that “this request was properly requested and granted to PG&E’s staff by management.”

The Belden Powerhouse outage lasted from July 13, 2012 until September 16, 2012. Based on PG&E’s Root Cause Analysis, “[B]y Wednesday, July 18th, the oily water had been removed from site and the basement thoroughly cleaned to restore normal sump pumping functions. Generator bearing disassembly was initiated to repair the damaged upper guide and thrust bearings.”¹ Therefore, the oil clean up only lasted about 5 days and DRA concluded that the rest of the 2-month outage was used to repair the damaged generator’s upper guide and thrust bearings. As PG&E acknowledged in its Root Cause Analysis report, “the generator upper guide and thrust bearings were damaged by a loss of lubrication and resulting high temperatures.”² Based on this acknowledgment, had the unit been shut down in time where sufficient lubrication was still available, the generator upper guide and thrust bearings damage caused by a loss of lubrication could have been avoided, thereby limiting the duration and severity of the outage. Because Belden Powerhouse is not manned continuously, the only way for PG&E to know that something was wrong (and shut the unit down while sufficient lubrication was still available) was through one of the two alarms, had they been operational.

¹ Belden Root Cause Analysis, p. 2, lines 60-63.

² Belden Root Cause Analysis, p. 2, lines 35-37.

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PG&E File Name:	EnerResourceRecoveryAcct2010-Compliance_DR_PGE_DRA-003/Q4		
Request Date:	September 9, 2013	PG&E Witness:	Redacted
Due Date:	September 16, 2013	DRA Witness:	Yakov Lasko

Question 3.4:

Chapter 2 – PG&E’s Management of Utility-Owned Generation - Nuclear and Hydro (Yakov Lasko)

3.4. Please explain DRA’s understanding of the location of where the Belden OSPP leak detection alarm is monitored by PG&E personnel. Please explain DRA’s understanding of the distance between the location of where the Belden OSPP leak detection alarm is monitored by PG&E personnel and the Belden Powerhouse.

DRA Response

It is DRA’s understanding, based on the Root Cause Evaluation Report provided by PG&E, the Belden OSPP leak detection alarm is monitored by PG&E personnel at the Caribou Switching Center. PG&E did not provide information that shows the actual distance between the Caribou Switching Center and the Belden Powerhouse. Using census-designated places for Belden, CA and Caribou, CA shows that the approximate distance is 9.4 miles.