

**BEFORE THE  
CALIFORNIA ELECTRICITY GENERATION  
FACILITIES STANDARDS COMMITTEE**

California Electricity Generation Facilities Standards )  
Committee - Generating Facility Logbook Requirement )  
\_\_\_\_\_ )

**COMMENTS OF AES ALAMITOS, LLC, AES HUNTINGTON BEACH, LLC,  
AND AES REDONDO BEACH, LLC ON  
DRAFT GENERATING LOGBOOK REQUIREMENTS**

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February 24, 2003

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Pursuant to the schedule established at the February 3, 2003 meeting of the California Electricity Generation Facilities Standards Committee ("Committee"), AES Alamitos, LLC, AES Huntington Beach, LLC and AES Redondo Beach, LLC (hereinafter collectively referred to as the "AES Generators") submit their comments on the draft Generating Facility Logbook Requirements ("Logbook Requirements") set forth as Attachment B to the Administrative Law Judge's Ruling: Report of Activities and Decisions made at February 3, 2003 Meeting of California Electricity Facilities Standards Committee; Confirmed Notice of March 17, 2003, Meeting.

AES Generators appreciate the opportunity to comment on the draft Logbook Requirements. We have carefully reviewed the draft and we are confident that a mutually agreeable set of recording requirements and procedures can be determined. In fact, AES Generators would point out that many of the items requested in the Committee's proposed Logbook Requirements are already being recorded and gathered in other reports. Thus, in many instances, the Committee's request for information may be satisfied by directing it to the appropriate existing report.

In commenting on the draft Log Requirements, AES Generators will first present certain general comments on the draft Logbook Requirements in their entirety. Second, AES Generators will present specific comments on certain draft Logbook Requirements. In many cases, the nature of these specific comments is simply to point out instances where one of the general comments is applicable.

## **GENERAL COMMENTS**

AES Generators respectfully provide the following general comments on the draft Logbook Requirements:

1. The draft Logbook Requirements fail to take into account the diversity of generating plants and their operation. The draft Logbook Requirements propose to require all generating facilities to adopt and maintain certain logbooks, each with specific reporting procedures and requirements. The proposed Logbook Requirements seem to assume that electric generating plants operate in an environment and under conditions similar to that which occurred when they were owned by the investor owned utilities. However, there have been changes in the industry that are not adequately reflected in the draft Logbook Requirements. More specifically:

A. The draft Logbook Requirements assume that the units are dispatched by the owner/operator. Today's generating plants, however, may be subject to contractual arrangements, such as tolling and dispatch agreements which were unparalleled during IOU ownership. These types of agreements call for an entity other than the asset owner/operator to dispatch the generating units. For example, the AES Generator's, which are the owner/operator of their respective generating facilities, do not dispatch the units. Rather, under the terms of a contract with Williams Energy Marketing and Trading ("Williams"), the units are dispatched by Williams, the marketer/dispatcher. As a result of these contractual arrangements, the owner/operator is not privy to dispatch decisions. The draft Logbook Requirements, however, do not take these types of arrangements into account and request information from the owner/operator that in many instances is not available to it, but must be obtained from other sources, such as the marketer/dispatcher.

Another example of the draft Logbook Requirements failure to accommodate diverse operating arrangements is in the area of fuel supply. The draft Logbook Requirements require the owner/operator to provide certain information on fuel supply. Yet, under the operating arrangement described above, fuel supply is the responsibility of Williams, not the owner/operator. Once again, this information is more appropriately obtained from the responsible party, the marketer/dispatcher.

B. The draft Logbook Requirements also seem to assume a certain "traditional" form of staffing for all generating plants. They assume that there is a Shift Supervisor, a control room operating staff and equipment operators. In fact, this assumption is not true

for all organizations. The AES Generators, for example, do not have a Shift Supervisor. The AES Generators should not be required to add another layer of management, nor do they intend to do so, simply to meet the Logbook Requirements. Rather, the Logbook Requirements should be amended to accommodate all forms of work force organization without mandating a particular structure.

C. The draft Logbook Requirements make certain assumptions that each plant will have certain equipment and software that will allow it to comply with the Logbook Requirements. Not all plants have the existing capability to electronically log operational information. If such equipment is required, sufficient time must be provided to allow this it to be acquired and installed.

2. The draft Logbook Requirements fail to give any guidance with respect to materiality or pertinency. For the most part, the information that is required for the Control Operator Log is very detailed. In other instances, however, the draft Logbook Requirements does not provide guidance with respect to materiality or pertinency. For example, a standard practice might be to log the starting and stopping of motors of a certain size and larger. However, the Logbook Requirements simply state that the Control Operator Log is to reflect the starting and stopping of equipment, without giving any thresholds or guidance as to what type of equipment should be logged. It is AES Generators' opinion that these type of log entries will dilute the usefulness of such logs.

3. Some of the required information may be collected by other entities or kept in other places and should not have to be duplicated into a single logbook. It is our understanding and recommendation that as long as the operator is appropriately logging and recording the required information that the existing process being utilized to that end does not need to be modified. To require duplication or consolidation of information into a single logbook would not improve the process and, in fact, could lead to error in duplication, transcription or interpretation.

## **SPECIFIC COMMENTS ON DRAFT GENERATING FACILITY LOGBOOK REQUIREMENTS**

In this section of AES Generators' comments, the draft Logbook Requirements are set forth, as proposed by the Committee, followed by specific comments or references by AES Generators.

### **PURPOSE**

The intent of this document is to define the types of generating facility logs required and to describe the essential documentation necessary to satisfy these requirements.

### **II. GENERAL**

Each generating facility shall maintain logs that contain the chronological history of the facility providing detailed reference to the operations and maintenance of the facility.

Two types of station logs are required: the Shift Supervisor Log and the Control Operator Log. In addition, two optional logs, Equipment Out of Service Log and Work Authorization Log may be utilized (see exceptions 1 and 2).

*Response: See General Comments 1.B. and 3. above.*

All required logs shall be kept in both hard copy and electronic formats for a minimum period of ten years from the date of the log.

*Response: This requirement is impractical for a number of reasons: First, there is no reason to keep such information for ten years; this is simply not a useful requirement. Also see General Comment 1.C. above.*

All log entries shall start by recording the time of the event. The Generating Asset Owner (GAO) is responsible for maintaining the integrity of the generating facility logs.

- A. **SHIFT SUPERVISOR (SS) LOG** – The Shift Supervisor Log is a formal log considered the overall facility record, including all generating units at that location and any other locations under the Shift Supervisor's responsibility. It shall identify all of the operating personnel on shift for the responsible period.

It shall contain a brief and concise summary of the Control Operator log. It shall contain overview information concerning work performed on facility equipment. It shall also contain an accurate and concise record of important and/or unusual events involving operations, maintenance, water chemistry, safety, accidents to personnel, fires, contractor activities, environmental matters and any other pertinent information concerning the operation of the facility. Records of any communications with outside entities including, but not limited to: Independent System Operator (ISO), scheduling coordinators, regulators, environmental agencies and CalOSHA shall also be maintained. It is required to record the identities of all individuals involved in any of the above activities.

*Response: See General Comment 1.B. above. The AES Generators do not operate with a Shift Supervisor form of organization.*

**B. CONTROL OPERATOR (CO) LOG** – The Control Operator Log is a formal record of real time operating events as well as the overall status of the generating units and auxiliary equipment under the purview of the Control Room Operator. It shall be maintained in accordance with these requirements in addition to any other requirements that mandate that events be recorded.

*Response: See General Comment 3. above.*

The first entry on each calendar day shall be at 0001 hours (Midnight).

Information in the midnight entry shall include:

1) Unit status, if on line, including:

*Response: To the extent that additional information to that which is currently being logged at the generating plants is required, software changes will be required or new software will have to be purchased (General Comment 1.C.). See also General Comment 3.*

- Current MW load.
- Generator kilo Volt (kV) and Mega VAR (MVAR) readings.
- Fuel type and availability.
- AGC status, both availability and whether on or off (if applicable).
- Condenser water box differential pressures, condenser back pressure/vacuum readings, boiler and pre-boiler water chemistry readings (if applicable).
- Status of environmental monitoring equipment.

*Response: All plants have a very complex regulated CEMS system. The environmental agency with primary responsibility over the monitoring system requires complex reports, including the status of the monitoring equipment. This is an example where existing reports should suffice. See General Comment 3.*

Or if off line:

- Type of outage with expected return date/time (including the ISO outage ID number).

*Response: This information is already provided to the ISO by the Scheduling coordinator. See General Comment 3. above.*

- Any other reason the unit is off line.

*Response: See General Comment 1.A. above. The owner/operator may not have this information, or have any means of obtaining it. It should be obtained directly from the marketer/dispatcher.*

- 2) Any unit MW output restrictions (de-rates) including reasons for and expected time/date of release (including the ISO outage ID number).

*Response: See General Comment 3 and 1.A. above.*

- 3) Status of any environmental constraints (for example total annual NOx allowable emissions vs. year to date total emissions or, for jet peakers, total allowable run time vs. current year to date actual run time).

*Response: This information is very detailed and complex. It is not appropriate that this information be compiled by operating personnel. see also General Comment 3. above.*

- 4) Equipment out of service, including any equipment that has been isolated and prepared for an upcoming work authorization with particular emphasis on redundant equipment that if the primary equipment fails, will result in a load restriction or a unit trip (see Exception 1).
- 5) Any abnormal operating conditions.
- 6) Outstanding work authorizations commonly referred to as clearances (see Exception 2).
- 7) Status of any retention/waste basins.
- 8) Status of any water conditioning equipment such as facility demineralizers and in stream demineralizers.
- 9) The on hand quantities of large consumables including distilled water, hydrogen, nitrogen and hypochlorite, if applicable.
- 10) Any other pertinent information regarding the status and reliability of the facility.

*Response: See General Comment 2. above.*

The first entry in the Control Operator log at the start of a shift shall identify each operator on that shift and by some regular means distinguish his/her responsibilities (list in a regular order the identity of the Shift Supervisor(s), Control Operator(s), Assistant Control Operator(s) and Plant Equipment Operator(s)). This initial entry shall indicate

that the crew has ascertained the plant status through the shift turnover, review of the log and a check of the indications and alarms in the control room.

*Response: See General Comment 1.B. above.*

Events shall be logged chronologically as they occur. Significant entries will include the control operator's name at the end of the entry preceded by the name(s) of others involved in the activity.

The events recorded in the Control Operator log shall include, but are not limited to, the following:

1. Any changes to generator megawatt (Mw) output (except when on Area Generation Control [AGC]). The current load of the unit shall be recorded as well as the new target load and the reason for the load change including:

*Response: See General Comment A.1. above. This information should be gathered from the marketer/dispatcher. The information required by subparts a), b), c), d), f), and g) below are all items that are controlled by the marketer/dispatcher and not the owner/operator.*

- a) As directed by the *day ahead* schedule.
  - b) Deviations from the schedule as directed by a scheduling coordinator.
  - c) Load reductions for scheduled equipment outages (cleaning condensers, pump repairs, etc.).
  - d) ISO directions.
  - e) Unplanned unit equipment problems (forced derates) including load restrictions for environmental causes.
  - f) Reducing to minimum load.
  - g) Any other reason.
2. Starting and stopping of equipment and any associated abnormal conditions.

*Response: See General Comment 2.*

3. Significant operations and milestones in the process of major operations such as start ups, shutdowns, heat treats, etc.
4. During a unit start up, once on line, each generator load increment released to the scheduling coordinator.
5. Each instance where a unit is placed on or removed from AGC, including a notation if the AGC limits are set for a different value than the normal AGC range for that unit.
6. Any changes to the future schedule for generator output.



*Response: See General Comment 1.A. above.*

7. Detailed account of unit trips including any known or suspected causes and remedial action taken.

*Response: See General Comment 3. above. Furthermore, it is not an appropriate practice to log "suspected" causes; the log entry should be limited to known causes.*

8. Load limit position anytime it is placed at any value less than full load and reason for such action.

*Response: See General Comment 2. above.*

9. All outage information for requests, denials, approvals and completions including date, time, duration, reason and the identities of all involved.

*Response: See General Comment 1.A. above.*

10. All work authorizations issued and released and the reason for such work.
11. Equipment placed in a not normal status.
12. Equipment declared out of service including date and time of initial OOS declaration.
13. Any current or potential fuel-supply problems.

*Response: See General Comment 1.A. above.*

14. Results of performance tests including heat rate tests, hotwell drop tests, turbine stop valve tests, etc.

*Response: See General Comment 3. above. In addition, this requirement does not reflect industry standards. AES Generators enter into its logs the fact that a test is taking place, including the starting and stopping time. They log the results of hotwell drop tests, but they do not log heat rate test results. That is provided in a separate report after the fact.*

15. Equipment outages of environmentally sensitive equipment or environmental monitoring devices.

*Response: See General Comment 3. above.*

16. All out-of-limit water chemistry conditions including duration and remedial actions, as well as all boiler chemical feeds and boiler drum blowdowns where applicable.
17. Changes in equipment/systems status (such as a suspected boiler tube leak, fouled condensers, feedwater heater tube leak, or other changes in status).

*Response: It is not appropriate to log "suspected" items; the log should be limited to known causes.*

18. Detailed information regarding environmental limitations exceeded, including the date, time, duration, amount, and any known or suspected cause.

*Response: See General Comment 3. above. In addition, as previously noted it is not appropriate to log "suspected" causes; the log should be limited to known causes.*

19. Detailed reports of observations related to transmission system or facility trouble involving frequency or voltage deviations.
20. Report of any industrial accident including all details of the incident and the names of all parties involved.
21. All other pertinent information concerning the operation of the facility including names of all individuals involved.

*Response: See General Comment 2.*

**Exceptions:**

1. In lieu of logging equipment out of service information in the midnight entry, an Equipment Out of Service Log may be utilized, at the discretion of the GAO, to track equipment declared out of service. The work authorization program is intended to provide a safe work environment for current maintenance activities. If a delay is encountered in the repair process, the work authorization should be released and the equipment declared out of service (OOS). If the OOS designation is expected to be of short duration (five days or less), the OOS entry should be carried forward in the midnight Control Operator Log entry. If a longer period is anticipated, the OOS entry can be recorded in the OOS log to avoid carrying it forward repeatedly in the CO log.

*Response: See General Comment 2.*

**Information in the OOS log shall include the following:**

- Equipment description
- Date declared OOS
- Reason for being declared OOS
- Estimated time for equipment to return to service
- Name of person declaring equipment OOS
- Maintenance order number or similar tracking mechanism
- Contact person(s)
- Date equipment is returned to service

2. In lieu of logging outstanding work authorizations in the midnight entry, a Work Authorization log book may be utilized, at the discretion of the GAO, during

periods of construction, overhauls or major work and only contains work authorizations, commonly referred to as clearances, issued and released associated with the special activity. All other entries pertaining to the special activity shall be entered in the Control Operator log. Work authorization log entries do not need to be carried forward each midnight but remain for the duration of the special activity. Information in the OOS log shall include the following:

- Date and time the clearance was issued.
- Name of the Control Operator or Assistant Control Operator issuing the clearance.
- Identification of clearance.
- Name of person the clearance is issued to.

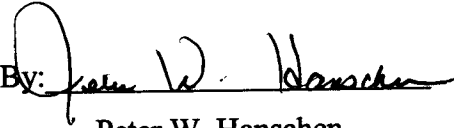
### III. CONCLUSION

AES Generators hopes that these comments are helpful to the Committee. AES Generators respectfully requests that its comments be incorporated into any Log Book Requirements considered for adoption by the Committee.

Dated: February 24, 2003

Respectfully submitted,

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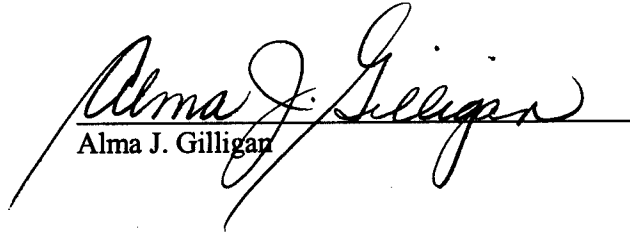
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**CERTIFICATE OF SERVICE**

I, Alma J. Gilligan, certify that on February 24, 2003 I served a true copy of the original attached document entitled **COMMENTS OF AES ALAMITOS, LLC, AES HUNTINGTON BEACH, LLC, AND AES REDONDO BEACH, LLC ON DRAFT GENERATING LOGBOOK REQUIREMENTS** by e-mail to the attached service list.

Dated: February 24, 2003, at Walnut Creek, California.

  
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