

**COMMENTS OF THE
CONSTELLATION GENERATION GROUP
REGARDING DRAFT LOGBOOK REQUIREMENTS**

Pursuant to the schedule articulated in the February 3, 2003 ALJ Ruling (“Ruling”) served in the California Public Utilities Commission (“CPUC” or “Commission”) Rulemaking Docket R.02-11-039, Constellation Generation Group, LLC (“CGG”) respectively presents its comments on the California Electricity Generation Facilities Standards Committee (“Committee”) draft Generating Facility Logbook Requirements (“Draft Logbook Requirements”).¹

I. Background

CGG has interests in approximately 1,142 MWs of generation in California, including 224 MWs of operating biomass, solar, geothermal and hydroelectric “qualifying facility” resources. CGG is developing the nominal 750 MW gas-fired combined cycle High Desert Power Plant (“HDPP”) in Victorville, California. The HDPP project was initially presented to the California Energy Commission (“CEC”) in June 1997 and following an exhaustive environmental review, received its CEC approval in May 2000. HDPP is under construction now and is expected to be in commercial operation during the 2003 peak season. The output from HDPP will flow to California consumers through a long-term bilateral contract with the Department of Water Resources (“DWR”). The DWR contract includes extensive provisions

¹ The February 3, 2003 ALJ Ruling articulates the Committee’s commenting schedule and contains a copy of the draft logbook requirements. The Ruling is available at http://www.cpuc.ca.gov/word_pdf/RULINGS/23583.pdf.

related to the maintenance and availability of the project, including significant financial penalties for poor plant performance.

CGG supports the overarching goal and intentions underlying the logbook requirements, namely the standardization of a “chronological history of the facility providing detailed reference to the operations and maintenance of the facility.” Draft Logbook Requirements, page 1.

However, given the technological capabilities of new facilities, such as HDPP, and the common goal of suppliers and their customers that generation facilities operate as efficiently as possible, CGG provides the following comments on the Draft Logbook Requirements. Our primary concern is that the new requirements will likely impose excessive recordkeeping burdens that can distract and take time away from the primary focus of operations personnel —the efficient and reliable operation of generation facilities.

II. CGG Comments On Committee’s Draft Logbook Requirements

A. The Logbook Requirements Should Reflect Modern Facility Operations.

The Draft Logbook Requirements imposes a “Shift Supervisor Log.” CGG respectfully suggests that such a requirement calling for separate Shift Supervisor and Control Operator logs would be needlessly duplicative. Modern facility staffing levels at many efficiently operated facilities do not include a Shift Supervisor position, and the information sought under the Shift Supervisor Log requirement is captured in current Control Operator logs. Hence, there is no need to have a second logbook with the same information as is found in the Control Operator Logbook. The Control Operator Logbook is a formal log and constitutes the full operation and maintenance documentation and is considered the overall facility record legally and otherwise. CGG respectfully requests that the Draft Logbook Requirement simply specify the required

information that must be documented to achieve a standardized and complete chronological facility history without calling for two separate logbook “types.”

B. Imposing Duplicate Logging Requirements Is Unnecessary.

CGG respectfully requests that the Committee remove the requirement that dual logbooks be maintained, one in hardcopy and another in electronic form. Keeping a redundant electronic logbook would take an operator away from his primary duty of keeping power flowing to the grid and could result in inadvertent inconsistencies between the dual logs. From an Operations viewpoint a hard copy logbook is sufficient documentation. If, however, the electronic format requirement was intended solely for archiving purposes (e.g., periodic scanning of hard copies to maintain electronic archives), then CGG could support a clarification to that effect.

C. The Midnight Entry Logging Requirement Should Avoid Extraneous Recordkeeping.

CGG suggests that information routinely tracked and logged on a timely basis should not be required to be re-entered for the Midnight Entry. For example, routine recording of condenser pressures, water chemistry, retention basin levels, emissions year-to-date information, and status of water conditioning equipment need not be duplicated for the Midnight Entry.

D. First Entry Of Operator Log Need Not Characterize Crew Roles.

As a result of extensive cross training, CGG plants can be staffed with all Operations and Maintenance Technicians. These individuals are capable of performing all Control Operator duties and can operate any and all plant equipment. Therefore, a required listing of each operator and their responsibilities—as called for in the Draft Logging Standards at page 3—need not apply.

III. Conclusion.

CGG respectfully requests that the Committee modify the Draft Logging Requirements as requested above. The suggested changes reflect the operations of new facilities and can avoid redundant recordkeeping burdens while achieving the overarching goal of standardizing the “chronological history of the facility [by] providing detailed reference to the operations and maintenance of the facility.” Draft Logbook Requirements, page 1.

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Respectfully submitted,

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