

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Rulemaking to implement the provisions
of Public Utilities Code § 761.3 enacted
by Chapter 19 of the 2001-02 Second
Extraordinary Legislative Session.

Rulemaking 02-11-039
(Filed November 21, 2002)

**MIDWAY-SUNSET COGENERATION COMPANY'S COMMENTS ON PROPOSED
LOGBOOK REQUIREMENTS**

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Pursuant to the Scoping Memo And Ruling Of Assigned Commissioner filed in this proceeding on February 19, 2003, Midway-Sunset Cogeneration Company (Midway-Sunset) submits the following comments on the proposed Generating Facility Logbook Requirements (Requirements) issued on January 31, 2003.

The stated purpose of the Requirements is to “define the types of generating facility logs required and to describe the essential documentation necessary to satisfy these requirements.” Midway-Sunset agrees with the overall intent of the Requirements which is to ensure the safe and efficient operation of generation facilities in the State of California. In developing the Requirements however, the Commission must balance the need to collect important and accurate data with the negative effects that can result from unnecessary administrative requirements which overburden plant operating personnel to the ultimate detriment of the safe and efficient operation of facilities.

Issue 2.1.1.

How should the Commission implement logbook requirements adopted by the Committee?

In the process of implementing any Requirements, the Commission must take into account the actual operating conditions of facilities and must not impose Requirements that result in plant operators spending time on unnecessary administrative compliance to the detriment of the safe and efficient operation of generating facilities.

1. The Requirements Must Account For Actual Operating Conditions At Facilities.

Quite simply, the Requirements should not require plant operators to engage in reporting and documentation of activity that is not relevant to the plant in question. As one example of this, the Requirements as drafted require that a Shift Supervisor (SS) Log be maintained. Such a requirement is antiquated and unnecessary to many facilities which do not have shift supervisor positions any more. Facilities should not be required to maintain logs that are not applicable to their operations and should either be exempted from the Requirements to the extent that the Requirements do not apply or the Requirements should clearly state that facilities are not responsible to maintain logs that do not apply to their particular operations.

2. The Requirements Should Be The Least Burdensome Possible.

Multiple logbooks do not ensure that a plant runs safer or more efficiently. The greater the administrative burdens that are imposed upon plant personnel, the less time that they will have to operate and maintain their facilities. Accordingly, the requirement should be that each facility have a logbook that records all necessary and appropriate

data. This would be similar to a ships log. This log should be able to be kept in either an electronic or hard copy format depending on what is most efficient for plant operators. Supervisory staff should be free to have an external plant presence rather than overburden them with administrative duties that have no measurable benefit.

In conclusion, one Control Operator logbook in either an electronic or manual format combined with an Out of Service and Abnormal Circuits logbook are all that is required. A Shift Supervisor Log should be optional for facilities large enough to require shift supervisors for their operations. This will serve to ensure the safe and efficient operation of generation facilities in the State of California without unnecessarily overburdening plant operating personnel.

Respectfully submitted,

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