

**INITIAL COMMENTS ON PROPOSED GENERATING
FACILITY LOGBOOK REQUIREMENTS OF
RELIANT ENERGY COOLWATER, INC., RELIANT ENERGY ELLWOOD,
INC., RELIANT ENERGY ETIWANDA, INC., RELIANT ENERGY
MANDALAY, INC.,
AND RELIANT ENERGY ORMOND BEACH, INC.**

SUBMITTED TO THE

**CALIFORNIA ELECTRICITY GENERATION FACILITIES
STANDARD COMMITTEE**

ON

FEBRUARY 24, 2003

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I. INTRODUCTION

Reliant Energy Coolwater, Inc., Reliant Energy Ellwood, Inc., Reliant Energy Etiwanda, Inc., Reliant Energy Mandalay, Inc., and Reliant Energy Ormond Beach, Inc. (collectively or individually, “Reliant”), submit these initial comments on the draft Generating Facility Logbook Requirements issued by the California Electricity Generation Facilities Standards Committee (the “Committee”).¹ Reliant welcomes the opportunity to work with the Committee on the standards-setting process.

II. BACKGROUND

Relevant to this proceeding, Reliant owns approximately 3,800 MW of gas-fired generation at five generating facilities located in Southern California. Reliant acquired these facilities in 1998 from the Southern California Edison Company (“SCE”) as part of the restructuring of California’s electric utility industry pursuant to AB 1890. From their acquisition in 1998 through Spring 2001, these facilities were maintained under a contract with SCE. Beginning in Spring 2001, Reliant began to operate and maintain the

¹ In submitting these initial Comments and otherwise participating in this proceeding, Reliant expressly reserves each and every, all and singular, its rights to challenge the legislation enacted in Chapter 19 of the 2000-2001 Second Extraordinary Legislative Session and the authority conferred on the Commission or Committee therein, as well as any requirement that the Commission may attempt to impose on Reliant pursuant to such authority or otherwise. Reliant’s submission of these initial Comments and its participation in this proceeding is purely voluntary, in no way implies its acceptance of, or acquiescence to, Commission jurisdiction over federally designated Exempt Wholesale Generators (“EWG”), and shall not operate as a waiver of any of the foregoing rights, or an admission that the Commission or the Committee possesses authority to impose any requirement on Reliant, its facilities or its operations, including, without limitation, authority to require Reliant to participate in this proceeding.

generating facilities using its own forces. Reliant has been and currently is involved in an ongoing process to refine and improve its maintenance, logging and operating procedures.

III. COMMENTS

Reliant appreciates the effort that went into drafting the proposed Generating Facility Logbook Requirements. However, like the proposed generating facility maintenance standards, the proposed logbook requirements do not reflect the variety of practices, all in accordance with Good Industry Practice, currently in use at generating facilities across California. Reliant provides detailed comments on the logbook requirements in the attached marked up draft of the proposed Generating Facility Logbook Requirements (see Attachment A).

Reliant's comments fall into three general categories: 1) The Shift Supervisor Log and Control Operator Log are redundant; 2) the recording requirements are either overly prescriptive and burdensome or unnecessary; and 3) the requirements will not improve either the maintenance or the operation of generating assets. Each of these points will be described briefly below. Detailed comments on the proposed logbook requirements are included on a marked up copy of the proposed logbook requirements attached as Attachment A to these comments.

The Shift Supervisor Log and Control Operator Log are Redundant

The proposed logbook requirements call for the maintenance of both a Shift Supervisor Log and a Control Operator Log. These logs are redundant. In fact, for Reliant facilities, the position of Shift Supervisor was eliminated when Reliant took over

operation and maintenance of the generating facilities from SCE in Spring 2001. The responsibilities of the Shift Supervisor have been assigned to other personnel (e.g., Operations Manager and Control Room Operator). All information that would have been recorded by a Shift Supervisor is recorded by those personnel in an applicable location. In addition, a lot of the information that may be recorded in the Shift Supervisor Log is redundant with the Control Operator Log. For example, certain Reliant plants record all dispatch orders, unit trips, unit deratings, and loss of major equipment in the Control Operator Log. In those cases in which the information is not included in the Control Operator Log, the information is recorded and maintained in accordance with Good Industry Practices. Thus, the requirement for a Shift Supervisor Log should be eliminated.

The Proposed Logbook Requirements Are Overly Prescriptive, Burdensome or Unnecessary to the Proper Operation and Maintenance of the Facility

Many of the proposed additions to the Control Operator Log will increase the amount of work required for the control operator while not improving the operation or maintenance of the generating facility. For example, the requirement that the log be maintained in both electronic and hard copy just doubles the amount of work for the control operator while providing no additional benefit to the plant. In addition, the proposed requirements have the control operator recording data readily available from other sources. For example, Reliant maintains an exhaustive database called Pi, which is used to track and record a host of operational data (e.g., generator kV and MVAR readings). Such “double” recording of information adds an unnecessary burden on the control operator and unnecessary cost on the company. A requirement that specific

information be included in the Control Operator Log should only apply if that information is not recorded elsewhere in accordance with Good Industry Practice.

The proposed requirements also will require the control operator to research and record information that is not pertinent to his/her job, and thus unnecessarily distract from the critical task of safely and efficiently operating the facility. For instance, the proposed log has the control operator recording CAISO outage identification numbers. The control operator does not interface directly with the CAISO, and thus does not receive this information. The CAISO interfaces with Reliant's scheduler who is not located at Reliant's generating facilities. In order to comply with this specific requirement, which has no bearing on the operation and maintenance of a generating facility, the control operator would have to track down and record an outage number for no reason other than it is a "requirement." Therefore Reliant recommends that this requirement be deleted.

Similarly, the proposed requirements would have the control operator record the reasons for a change in facility output. This is not something the control operator typically knows. In many cases, the reason a facility's output changes is a result of contractual obligations with a purchaser. For example, purchasers of Reliant's power often only need the energy during the peak hours of the day (7 AM – 11 PM). Absent real-time prices that would justify a different level of output, this means that Reliant will increase the output of its facilities before 7 AM and reduce the output after 11 PM or as otherwise specified by any contractual commitments entered into under a bilateral transaction. In these instances, the control operator is simply matching the generating facility's output with a predefined schedule. Since these output changes are largely driven

by the needs of Reliant's counterparties, it is impossible for the control operator to know the reasons for such changes in facility output.

In other instances, Reliant is instructed by the CAISO to either increase or decrease the output of its generating facilities. As discussed above, this communication occurs between the CAISO and Reliant's scheduler, thus the control operator is not aware of the reasons why the CAISO is requesting Reliant to change the output of its facilities.

Given the above information, Reliant does not believe it is feasible for the control operator to meet this specific requirement. Additionally, Reliant does not believe that recording this information in the Control Operator Log improves the safe and reliable operation of a power plant. Therefore, Reliant recommends that these requirements be removed.

Many of the Proposed Requirements Will Not Improve Plant Performance

As can be seen from the discussion above, many of the requirements will impose additional burdens on the control operator without improving plant performance. The purpose of the Control Operator Log is to record significant events at the generating facility as they happen. Recording requirements for things such as the status of retention ponds and demineralizers, beyond the existing requirements promulgated by the relevant regulatory agency, only serve to clutter the Control Operator Log and take away from its primary function of recording significant facility events. The Committee should consider whether such detailed reporting requirements will actually serve to improve plant operation and maintenance – the goal of SB 39XX – or will merely serve to create busy work and distract from critical plant operations.

Reliant provides detailed comments on the logbook requirements in the attached marked up draft of the proposed Generating Facility Logbook Requirements (see Attachment A).

IV. CONCLUSION

Reliant appreciates the effort that went into drafting the proposed logbook requirements. As noted in Reliant's detailed comments, many of the proposed requirements reflect current practices. Reliant respectfully submits, however, that changes should be made to the proposed requirements, as described, above. Reliant looks forward to working with the Committee in developing appropriate and useful logbook standards.

Respectfully submitted,

(electronically signed)

Kurt W. Bilas

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Dated: February 24, 2003

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the **INITIAL COMMENTS ON THE PROPOSED GENERATING FACILITY LOGBOOK REQUIREMENTS OF RELIANT ENERGY COOLWATER, INC., RELIANT ENERGY ELLWOOD, INC., RELIANT ENERGY ETIWANDA, INC., RELIANT ENERGY MANDALAY, INC., AND RELIANT ENERGY ORMOND BEACH, INC.**, on the electronic service list maintained for this proceeding.

Executed on February 24, 2003, at Washington, D.C.

(electronically signed)

Kurt W. Bilas

ATTACHMENT A

RELIANT'S DETAILED COMMENTS ON THE GENERATING FACILITY LOGBOOK REQUIREMENTS¹

I. 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).

Reliant has no Shift Supervisor. This position and title was a Southern California Edison ("SCE") position and no longer exists. Thus, there is no Shift Supervisor to maintain the log. The responsibilities of the Shift Supervisor have been assigned to other personnel (e.g., Operations Manager and Control Room Operator). All information that would have been recorded by a Shift Supervisor is recorded by those personnel in accordance with Good Industry Practices.

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.

Reliant maintains logbooks in either hard copy or electronic format. The required maintenance of both forms of logbooks is unnecessary and redundant.

Normal document retention is 3 to 5 years. A 10-year retention period is excessive, unnecessary and unduly burdensome. Plant operators should be given the discretion to retain documents longer than the normal 3 to 5 year period.

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

¹ Reliant's comments are shown in bold italics following the proposed requirement.

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. – ***As noted above, Reliant does not have Shift Supervisors. The requirement for this log should be deleted. Much of the information recorded in it is redundant with information recorded in either the Control Operator Log or other sources maintained in accordance with Good Industry Practices. Requiring this log is unduly burdensome and will create needless paperwork.***

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.

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:
 - Current MW load.
 - Generator kilo Volt (KV) and Mega VAR (MVAR) readings. ***Reliant currently records this information in the Pi data history program. This information does not benefit the Control Operator and is redundant with Reliant's data collection process.***
 - Fuel type and availability. ***Availability of natural gas fuel is not the type of information to which the Control Operator has access. At this point, natural gas is the only available fuel for Reliant's generating facilities. Recording the same piece of unchanging information each day is unnecessary and unduly burdensome.***
 - 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). ***Recording this data in the logbook does not assist the CO. Moreover, this data is recorded three times per day on an operator reading form; thus the requirement is redundant.***
 - Status of environmental monitoring equipment. ***Reliant currently employs different methods for recording environmental monitoring equipment information. Plant operators record this information in***

either the Control Operator Log or other easily accessible data sources. The requirement of recording this information in the Control Operator Log is redundant provided the information is currently recorded in accordance with Good Industry Practices.

Or if off line:

- Type of outage with expected return date/time (including the ISO outage ID number).
The Control Operator does not interface with the CAISO and does not have direct access to CAISO outage ID numbers, thus this requirement should be deleted.
 - Any other reason the unit is off line. *Reliant currently employs different methods for recording unit status information. Plant operators record this information in either the Control Operator Log or other easily accessible data sources. The requirement of recording this information in the Control Operator Log is redundant provided the information is currently recorded in accordance with Good Industry Practices.*
- 2) Any unit MW output restrictions (de-rates) including reasons for and expected time/date of release (including the ISO outage ID number). *Reliant currently employs different methods for recording derate information. Plant operators record derate information in either the Control Operator Log or other easily accessible data sources. The requirement of recording this information in the Control Operator Log is redundant provided the information is currently recorded in accordance with Good Industry Practices. The Control Operator does not have access to CAISO outage ID numbers, thus this requirement should be removed. Generally, outage release dates are handled by the Operations Supervisor or the Maintenance Supervisor, not the Control Operator.*
 - 3) Status of any environmental constraints (for example total annual NO_x allowable emissions vs. year to date total emissions or, for jet peakers, total allowable run time vs. current year to date actual run time). *This is important information and is calculated on a monthly basis. However, it is not recorded in the Control Operator Log, instead it is tracked elsewhere. Requiring this information to be recorded in the Control Operator Log is thus unnecessary and redundant. All decisions regarding environmental issues are made by management at either the station or in Houston.*
 - 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). *Reliant currently employs different methods for recording equipment-out-of-service information. Plant operators record this information in either the Control Operator Log or other easily accessible data sources. The requirement of recording this information in the Control Operator Log is redundant*

- provided the information is currently recorded in accordance with Good Industry Practices.*
- 5) Any abnormal operating conditions.
 - 6) Outstanding work authorizations commonly referred to as clearances (see Exception 2).
 - 7) Status of any retention/waste basins. *Reliant currently employs different methods for recording information related to the status of retention and waste basins. Plant operators record this information in either the Control Operator Log or other easily accessible data sources. The requirement of recording this information in the Control Operator Log is redundant provided the information is currently recorded in accordance with Good Industry Practices.*
 - 8) Status of any water conditioning equipment such as facility demineralizers and in stream demineralizers. *Reliant currently employs different methods for recording information regarding the status of water conditioning equipment. Plant operators record this information in either the Control Operator Log or other easily accessible data sources. The requirement of recording this information in the Control Operator Log is redundant provided the information is currently recorded in accordance with Good Industry Practices.*
 - 9) The on hand quantities of large consumables including distilled water, hydrogen, nitrogen and hypochlorite, if applicable. *Reliant currently employs different methods for recording information related to on-hand quantities of large consumables. Plant operators record this information in either the Control Operator Log or other easily accessible data sources. The requirement of recording this information in the Control Operator Log is redundant provided the information is currently recorded in accordance with Good Industry Practices.*
 - 10) Any other pertinent information regarding the status and reliability of the facility.

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) [*Reliant does not have either Shift Supervisors or Plant Equipment Operators*]). 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.

During normal shift relief, an exchange of information passes from the outgoing operator to the in-coming operator. There is no benefit to plant operation or maintenance to be gained from “indicating” that this transfer has taken place. Furthermore, recording such mundane matters will clutter the logbook, detracting from its real purpose.

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:
Load changes are currently logged "Go To xxx MW." As discussed in the attached comments, this information is typically not available to the Control Operator. Logbook entries should be limited to important issues addressing the safe and reliable operation of the plant. Furthermore, Reliant tracks all other load profile-type information in the Pi data history program.
 - a) As directed by the *day ahead* schedule. ***Operations follows the schedule unless directed otherwise.***
 - 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.
 - e) Any other reason.
- 2) Starting and stopping of equipment and any associated abnormal conditions. ***Reliant currently employs different methods for recording information related to starting and stopping of equipment. Plant operators record this information in either the Control Operator Log or other easily accessible data sources. The requirement of recording this information in the Control Operator Log is redundant provided the information is currently recorded in accordance with Good Industry Practices.***
- 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. ***The Control Operator is not involved in future schedules, thus, this requirement would require additional research by the Control Operator for information not pertinent to his/her duties.***

- 7) Detailed account of unit trips including any known or suspected causes and remedial action taken. ***Recording of causes of unit trips and remedial actions is best left to maintenance logs or other reports. The Control Operator may not be involved in identifying the causes of unit trips. This requirement may lead to needless speculation in order to satisfy the requirement.***
- 8) Load limit position anytime it is placed at any value less than full load and reason for such action.
- 9) All outage information for requests, denials, approvals and completions including date, time, duration, reason and the identities of all involved. ***Reliant currently employs different methods for recording information related to outage information. Plant operators record this information in either the Control Operator Log or other easily accessible data sources. The requirement of recording this information in the Control Operator Log is redundant provided the information is currently recorded in accordance with Good Industry Practices.***
- 10) All work authorizations issued and released and the reason for such work. ***Clearances are maintained in an electronic log and other work authorizations are maintained in hard copy.***
- 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.
- 14) Results of performance tests including heat rate tests, hotwell drop tests, turbine stop valve tests, etc.
- 15) Equipment outages of environmentally sensitive equipment or environmental monitoring devices.
- 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 ***Reliant currently employs different methods for recording information related to out-of-limit water chemistry conditions. Plant operators record this information in either the Control Operator Log or other easily accessible data sources. The requirement of recording this information in the Control Operator Log is redundant provided the information is currently recorded in accordance with Good Industry Practices.***
- 17) Changes in equipment/systems status (such as a suspected boiler tube leak, fouled condensers, feedwater heater tube leak, or other changes in status).
- 18) Detailed information regarding environmental limitations exceeded, including the date, time, duration, amount, and any known or suspected cause.
- 19) Detailed reports of observations related to transmission system or facility trouble involving frequency or voltage deviations. ***Reliant currently employs different methods for recording information related to transmission system of facility trouble. Plant operators record this information in either the Control Operator Log or other easily accessible***

data sources. The requirement of recording this information in the Control Operator Log is redundant provided the information is currently recorded in accordance with Good Industry Practices.

- 20) Report of any industrial accident including all details of the incident and the names of all parties involved. *Reliant currently employs different methods for recording information related to industrial accidents. Plant operators record this information in either the Control Operator Log or other easily accessible data sources. The requirement of recording this information in the Control Operator Log is redundant provided the information is currently recorded in accordance with Good Industry Practices.*
- 21) All other pertinent information concerning the operation of the facility including names of all individuals involved. *Reliant currently logs pertinent information, and at the discretion of the Control Operator, names of persons involved may be added.*

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. *Reliant currently uses various methods of tracking equipment declared OOS. Plant operators either maintain an OOS Log or use other appropriate practices (e.g., Redtag). If a piece of equipment is planned to be put OOS, then it is placed in the OOS log immediately.*

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. *The Control Operator does not have direct access to this type of information.*
- 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.

Reliant is in the process of changing its clearance procedure to a “Lock out Tag out” procedure. This will affect the way it currently tags, logs and issues work authorizations.