



**Pacific Gas and  
Electric Company**

**WE DELIVER ENERGY.**

**Janet C. Loduca**  
Attorney at Law  
Law Department

*Mailing Address*  
P.O. Box 7442  
San Francisco, CA 94120

*Street/Courier Address*  
77 Beale Street, B30A  
San Francisco, CA 94105

March 25, 2005

**VIA ELECTRONIC MAIL** 415.973.0174  
Fax: 415.973.5520

Consumer Protection and Safety Division  
Electric Generation Performance Program  
505 Van Ness Avenue  
San Francisco, CA 94102  
[operationplansummary@cpuc.ca.gov](mailto:operationplansummary@cpuc.ca.gov)

Re: R-02-11-039: Informal Comments on CPSD's Draft Operations Plan Summary

Dear Sir or Madam:

Pacific Gas and Electric Company (PG&E) hereby submits the following informal comments on the Consumer Protection and Safety Division's Draft Operation Plan Summary (Draft Summary). PG&E also supports the comments being submitted today by Andrew Brown on behalf of the "Joint GAOs". PG&E expects it will have additional comments to share at the upcoming workshop, tentatively scheduled for April 6, 2005.

The Draft Summary proposed by staff includes two larger sections: the first section summarizes the Unit Plan, and the second section summarizes compliance with each of the 28 Operation Standards. Within the second section, staff has included categories of elements associated with each Operation Standard. These elements are listed as bullet points under each standard. GAOs are instructed to: (1) specifically address each bullet point (or "content element") within each Operation Standard (or "chapter"); (2) summarize the various operating policies, procedures, training programs, and routines the GAO has in place to comply with the standards; (4) summarize and identify relevant document by title, number, location, and format; and (5) specify the frequency or cycle time for each repeated or regular action or inspection required to achieve compliance with the Operation Standards.

As discussed in the Joint GAO comments, PG&E believes the level of detail required by the Draft Summary is unnecessarily burdensome. PG&E has literally hundreds of policies, procedures, programs and routines (some of which are quite voluminous) upon which it relies to ensure compliance with the Operation Standards. Similarly, PG&E performs numerous routine actions and inspections, each with different frequencies, on its systems to ensure they are properly operated and maintained. To require a GAO to summarize each document upon which it relies, as well as each routine action taken, is overly burdensome. This is particularly true for facilities such as PG&E's Hunters Point and Humboldt Bay power plants, both of which are near the end of their plant service lives.<sup>1</sup> Rather, it should be sufficient for a GAO to provide a list of

---

<sup>1</sup> As the Commission is aware, PG&E plans to begin decommissioning the Hunters Point Power Plant as soon as it receives final notification from the ISO that the plant is no longer necessary for reliability purposes. Similarly, PG&E recently issued a Request for Offers for long-term electric supply, which included a specific request for offers to replace generation from Humboldt Bay Power Plant commencing in the 2008 to 2009 timeframe.

Consumer Protection and Safety Division

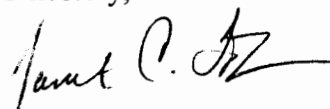
March 25, 2005

Page 2

the policies, procedures, programs and routines relevant to each standard. For the most part, the titles of documents themselves provide a general description of the document's purpose. To the extent the CPSD has specific questions regarding a particular policy, procedure, program, or routine, it has the ability to seek additional information from the GAO through a data request or follow-up questions during an audit.

Thank you for the opportunity to provide these informal comments. PG&E looks forward to further discussing the Draft Summary at the upcoming workshop.

Sincerely,

A handwritten signature in black ink, appearing to read "Janet C. Loduca". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Janet C. Loduca