

September 10, 2004

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RE: Southern California Edison Company's Comments On The California Electricity Generation Facilities Standards Committee's Draft Operations Standards for Generators

Dear Committee Members:

Pursuant to the procedural schedule set forth in the August 23, 2004 letter from Commissioner Carl Wood, Southern California Edison Company ("SCE") submits the following comments on the Committee's proposed Operational Standards.

I. Exemption Of Operational Standards For Non-FERC Licensed Hydro Facilities Less Than 50 MWs And All FERC Licensed Hydro Facilities

Non-FERC licensed hydro facilities that are less than 50 MWs and all FERC licensed hydro facilities are exempt from the California Public Utilities Commission's ("CPUC") maintenance standards.¹ For the reasons provided by the Commission in adopting these exemptions from the Maintenance Standards in GO 167, these same facilities should be exempted from the Operational Standards. Indeed, many of the draft Operational Standards are identical to the Maintenance Standards² and thus a consistent approach between the two sets of standards should be adopted.

¹ See Decision No. 04-05-018, Ordering Paragraph 2 and General Order 167 Section 3.2.

² Proposed Operational Standards 1-11 are virtually identical to the maintenance standards adopted by the Commission in Decision No. 04-05-018.

II. The Standards Should Be Separated From The Guidelines

The draft Operational Standards appropriately recognize that the guidelines are distinct from the standards, and therefore the Committee declined to adopt the guidelines as part of the Operational Standards themselves.³ Consistent with this recognized distinction, SCE suggests that the Committee not include the guidelines with the standards and instead submit to the CPUC for approval the standards only⁴ so that it is clear that generating asset owners are obligated to meet the standards only.

Guidelines should be suggestive in nature only and should not be given the same weight as the standards. There should be a number of equally valid ways of meeting the standards, in addition to those expressed in the guidelines. The audit process, which is described in the "Objectives"⁵ section of the draft Operational Standards, for example, should therefore be limited to the standards themselves and not the guidelines.

Moreover, any certification or verification to the Operational Standards should be limited to the standards themselves and should not include the guidelines. SCE is very concerned with the certification process that the CPUC's Consumer Protection and Safety Division ("CPSD") may implement for the Operation Standards. With respect to the Maintenance Standards, despite the obvious distinction between standards and guidelines, generating asset owners were instructed to complete a maintenance matrix which required generating asset owners to indicate whether they were in compliance with both the standards and guidelines. Requiring generating asset owners to be in compliance with both the standards and guidelines went beyond the requirements of GO 167 and further had the effect of elevating the guidelines to standards.

As drafted, SCE has significant concerns with the detailed guidelines of the Operational Standards and has attached a list of its objections and concerns of these guidelines.⁶ In order to maintain the distinction between standards and guidelines in the implementation of the certification process of the Operational Standards, SCE urges the Committee to separate the standards from the guidelines and make clear that any certification process relates to the standards only. However, because it is uncertain at this time how CPSD intends to implement the certification process of the Operational Standards, SCE appreciates the opportunity to discuss and resolve its objections and concerns of the guidelines outlined in Attachment A at the upcoming workshops scheduled for September 21 and 22.

³ August 23, 2004 Proposed Operations Standards And Guidelines For Generators, page 8 of 103 (Guidelines).

⁴ The Committee has issued the proposed standards as a separate document as well as a joint document that contains the standards and guidelines. It is unclear at this time if the CPUC will adopt the standards only or the joint standards/guidelines.

⁵ August 23, 2004 Proposed Operations Standards And Guidelines For Generators, page 7 of 103 (Objectives).

⁶ See Attachment A.

III. Utilities Should Be Required To Certify Compliance With The Operational Standards, But Not Have To Submit Operational Plans

Under GO 167, utilities are required to submit certifications of their maintenance plans, but they are not required to submit the plans themselves. The “Implementation” section of the draft Operational Standards is entirely inconsistent with this process and would require generators to submit their operational plans. SCE recommends that the Committee only require the certification of the operational plan, similar to the process adopted by the Commission in Section 7 of GO 167 for the Maintenance Standards.

IV. Proposed Standard 24 Is Duplicative Of Proposed General Duty Standard 4, Which Was Rejected By The CPUC

Proposed Standard 24 would require the generating owner to maintain a unit in readiness for service unless the CPUC (in consultation with the CAISO) affirmatively declares that the facility is unneeded for a specific period of time. Proposed Standard 24 appears to resurrect proposed General Duty Standard 4 (“GDS 4”), which would have required owners to seek declarations from the CAISO and CPUC prior to taking scheduled outages and to consult with the ISO when making a decision about taking a forced outage. Proposed GDS 4 was rejected by the Committee and returned to the staff for further amendment and clarification.⁷ It does not appear that proposed Standard 24 clarifies or substantively amends proposed GDS 4, and thus this standard should not be adopted.

V. Proposed Standard 23 Should Clarify The Type Of Change In Status Requiring Notification To The CPUC

Proposed Standard 23 requires the generating asset owner to notify the Commission prior to changing the “availability status” of the facility. SCE does not believe that the Committee intended to refer to a change in a plant’s availability status, which can change minute-by-minute. Instead, SCE believes that the Committee intended that the notification requirement applies to a change in the plant status, such as those set forth in the Guidelines B of Standard 23. SCE therefore recommends that proposed Standard 23 be modified as follows:

“The GAO notifies the Commission and the CAISO at least 90 days prior to a change in plant status of an electric generation unit or plant, such as shutdown, cold layup, mothballing, retirement, decommissioning, and similar changes that makes the plant unavailable for dispatch, except that the GAO may take forced outages and apply to the CAISO for planned maintenance outages in accordance with CAISO procedures.”

Proposed Standard 26 would likewise have to be modified because it also erroneously refers to “availability status.”

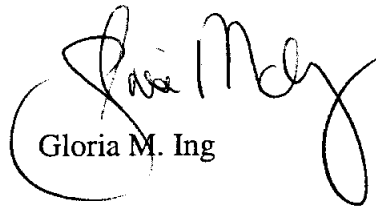
⁷ See July 15, 2004 ALJ Ruling in R. 02-11-039 (“Administrative Law Judge’s Ruling: Report of Activities and Decisions made at July 7, 2004, Meeting of California Electricity Generation Facilities Standards Committee.”)

Glenn Bjorkland, Carl Wood, Michael Kahn
June 16, 2004

**VI. The Notice Provisions in Proposed Standard 26 Are Unnecessary In
Light Of The Notice Provisions In Proposed Standard 23.**

Proposed Standard 26 would have the generating asset owner provide what would be, in effect, a 30-day notice the Commission, through the submission of plans and procedures, prior to its 90-day notice required in proposed Standard 23. In essence, under these two standards, generating asset owners would be required to provide two notices (one at 120 days and one at 90 days) when there is a change in plant status. SCE submits that the generating asset owner should be obligated to simply provide one notice (in the form of its plans and procedures) to the CPUC at 120 days prior to a change in plant status. Proposed Standards 24 and 26 should therefore be modified to eliminate the second notice requirement.

Very truly yours,



Gloria M. Ing

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Enclosures

cc: Electronic Service List, Rulemaking 02-11-039
(U 338-E)

Attachment A

Attachment A
SCE's Comments on Proposed Guidelines for Draft Operations Standards

INTRODUCTION

The comments below represent the concerns Southern California Edison Company ("SCE") has with the proposed Guidelines for the Draft Operations Standards issued by the California Electric Generation Facilities Standards Committee on August 23, 2004. In the introduction section of the Operations Standards the section titled "Guidelines" provides an explanation of the Guidelines' purpose. It states that "The Committee did not adopt this material as part of the Operations Standards themselves because there may be equally valid ways of meeting the standard that do not follow every provision of the Guidelines." SCE wholeheartedly agrees with the Committee that the Guidelines are distinct from the Operation Standards and that the guidelines are simply guidelines and are distinct from the Operation Standards which generating asset owners must certify compliance with. However, SCE is concerned because throughout the guidelines, statements such as "shall include but not limited to" are used in a manner that imply or state specific requirements must be met to satisfy the Guidelines. This approach appears to be in contradiction with the language from the introduction section quoted above and the stated objective that the standards are designed to be flexible. SCE would like the specific language used in many of the Guideline sections to be changed to be more general so that the important items are still identified but the approach to meeting the standard is truly flexible. The list below identifies some of SCE's concerns with specific Guidelines or sections of Guidelines that could apply to SCE facilities. This list of concerns is in addition to the other concerns SCE has raised in this Introduction and in its September 10, 2004 comments on the draft Operational Standards.

SPECIFIC COMMENTS ON GUIDELINES

Guideline 7-C

The validation process may not be completed until a new system or procedure has been in service for some time. This is often the case when new retrofitted equipment interfaces with older equipment.

Guideline 8 sections B-9, B-11 to 14

Often these items cannot be completed prior to release due to time and or cost constraints. Suggest a reasonable time frame be applied to this standard instead of the specifics provided.

Guideline 9-O

This appears to be redundant because of the requirements in Operation Standard 27.

Guideline 12-A

Established procedures may need to be overridden by management in emergency circumstances suggest this part of the guideline be rewritten because it appears to conflict with Guideline 12-C.

Guideline 13-K

Attachment A
SCE's Comments on Proposed Guidelines for Draft Operations Standards

To much detail, a guideline asking for appropriate response to plant conditions would be better when applied to routine inspections.

Guideline 13-M

See comment to Guideline 13-K.

Guideline 13-4

Guideline 13-R's requirement for checklists is excessive. Use of checklists should be determined by the GAO based on routines and systems involved.

Guideline 14-B

SCE recommends deleting the language, "and what must be done to remove the clearance."

Guideline 14-C

Chief Operator should be changed to Qualified Operator.

Guideline 14-D

Add "or listed on clearance card or other equipment list attached to the clearance card."

Guideline 14-L

Guideline 14-L requires clarification. Does this mean the "Chief Operator" removes the clearance from equipment, or that the clearance is removed from the control of the clearance holder? At SCE facilities the employee who would equate to the "Chief Operator" directs other qualified personnel to remove the clearance from equipment after release by the maintenance worker. More clarity is needed.

Guideline15-C

More clarity is needed to define what is meant here.

Guideline 16-A

The reference to "Cal-OSHA title 8" should be changed to "applicable State and local regulations" because some of the facilities General Order 167 has been applied to are not within the state of California.

Guideline 16-C

Remove "includes but not limited to" change to "that has features such as" or other language less specific which will provide more flexibility in approach. Often many of the functions listed are performed by a planning department within a facility. The method of operations tracking work is by contact with that group.

Guideline 17-D8

More definition of "failure event" suggest "significant failure event of a critical system."

Guideline 17-D12

This information may not exist for older facilities.

Attachment A
SCE's Comments on Proposed Guidelines for Draft Operations Standards

Guideline 17-D13

See comment to Guideline 17-D12.

Guideline 19

Throughout the standard and guideline a requirement is stated to obtain "regulatory relief" in emergency situations. "Regulatory relief" needs to be defined more clearly to except or exclude any requirement to obtain relief from environmental or safety regulations that reduce maximum output.

Guideline 20-D

The plan should be available to all plant personnel who should be required to understand the content. Posting of certain items such as evacuation routes is acceptable but posting an entire emergency response plan throughout the plan is excessive.

Guideline 22-C

This is not economically feasible at all facilities currently under G.O. 167 jurisdiction. Fuel to one SCE facility is supplied through a single line that is over 200 miles long. Local storage will only supply fuel for 1 to 2 weeks maximum.

Guideline 22-D

See comments for Guideline 22-C.

Guideline 28-A.H

In the first part of the guideline before the specific equipment guidelines section A., part H is too specific concerning Alert, Warning, and Action levels and responses. A guideline requiring appropriate response to equipment conditions should be used instead.

Guideline 28 (equipment sections)

- *Drum Boiler section (Guideline 28 – D)*
The requirement for check off sheets during all manners of operation is excessive. Boiler walkdown and other prefire checks are appropriate but check sheets for routine boiler rounds during on or off line modes should not be required.

- *Fuel Delivery System (Guideline 28 – F)*
Part 2b3 and 2b6 may not be applicable to older units that do not have all of the features detailed in the guideline. Something that requires the GAO to keep the current flame safety system in good working order with appropriate response procedure in place would be a better more flexible approach.

Part 2c4 "Alarms include but not limited to" will require unnecessary cost to install alarm systems on units that do not have all of the items on the list. Change to "Alarms such as" or a requirement to maintain installed

Attachment A
SCE's Comments on Proposed Guidelines for Draft Operations Standards

alarm circuits in working order with response procedures would be better.

- *Steam Turbine (Guideline 28 – H)*
 - 2a12 “All other protective trip devices in service” is too restrictive. There are times when trip devices are out of service for specific reasons. Generally there are back up or secondary trip circuits that provide adequate protection to the unit. If all circuits are required to be in service prior to start available generation may be withheld from service by application of this guideline.
 - 2a31 is too detailed some of the items on the list are not installed on older units. Also need definition of boiler pressure drop due to sliding pressure modifications and other functions of boiler turbine operations.
- *Turbine Lube Oil System (Guideline 28 – J)*

2g Not practical because centrifuges need to be periodically cleaned while the unit is in service.
- *Seal Oil System (Guideline 28 – K)*

2f8 some items such as this Alarm are not installed on all units. Often manual valve operation, with a logbook entry are how this is accomplished and identified.
- *Medium Voltage System (Guideline 28 – O)*

It appears that the detailed guidelines in this section include generator protection device circuits. The general guidelines say 480 to 4160 volt systems but the circuits listed are protection circuits. SCE questions whether this section should concern itself with 480 and 4kv bus and switchgear issues.
- *Fire Protection Systems (Guideline 28 – Z)*

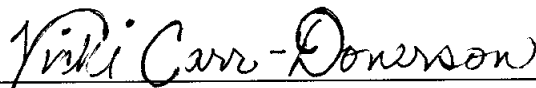
2a16 refers to “diesel” fire pumps and should be changed to “emergency” fire pumps because some applications are fueled by gasoline etc.

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of the **SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) COMMENTS ON THE CALIFORNIA ELECTRICITY GENERATION FACILITIES STANDARDS COMMITTEE'S DRAFT OPERATIONS STANDARDS FOR GENERATORS**, on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

- Placing the copies in properly addressed sealed envelopes and depositing such envelopes in the United States mail with first-class postage prepaid (Via First Class Mail):
 - To all parties, or
 - To those parties without e-mail addresses or whose e-mails are returned as undeliverable;
- Placing the copies in sealed envelopes and causing such envelopes to be delivered by hand or by overnight courier to the offices of the Commission or the other addressee(s);
- Transmitting the copies via e-mail to all parties who have provided an address.

Executed this 10th day of September, 2004, at Rosemead, California.



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