

May 23, 2003

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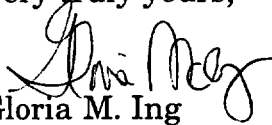
**RE: Southern California Edison Company and Pacific Gas and Electric Company's Reply Comments On The California Electricity Generation Facilities Standards Committee's Proposed Hydroelectric Logbook Standards**

Dear Committee Members and ALJs Thorson and Mattson:

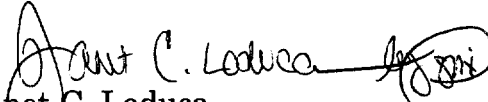
Pursuant to the Committee's May 9, 2003 letter, Southern California Edison Company ("SCE") and Pacific Gas and Electric Company ("PG&E") submit the following reply comments on the Committee's proposed hydroelectric logbook standards. For the reasons set forth in the utilities' May 19, 2003 comments and in these reply comments, the utilities do not believe it is necessary or appropriate for the Committee to adopt logbook standards for hydroelectric generating facilities. However, to the extent the Committee is inclined to do so, SCE and PG&E urge the Committee to not adopt the proposed standards set forth in the May 9, 2003 letter,

but instead adopt the proposed alternative standards set forth in these reply comments.

Very truly yours,



Gloria M. Ing  
for Southern California Edison Company



Janet C. Loduca  
For Pacific Gas and Electric Company

LW031430003.doc  
Enclosures

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

**BEFORE THE CALIFORNIA ELECTRIC GENERATION FACILITIES  
STANDARDS COMMITTEE**

Rulemaking to implement the provisions of )  
Public Utilities Code §761.3 enacted by ) R.02-11-039  
Chapter 19 of the 2001-02 Second )  
Extraordinary Legislative Session. )

**REPLY COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY  
AND PACIFIC GAS AND ELECTRIC COMPANY ON THE CALIFORNIA  
ELECTRIC GENERATION FACILITIES STANDARDS COMMITTEE'S  
PROPOSED HYDROELECTRIC LOGBOOK STANDARDS**

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Dated: May 23, 2003

**BEFORE THE CALIFORNIA ELECTRIC GENERATION FACILITIES  
STANDARDS COMMITTEE**

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**REPLY COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY  
AND PACIFIC GAS AND ELECTRIC COMPANY ON THE CALIFORNIA  
ELECTRIC GENERATION FACILITIES STANDARDS COMMITTEE'S  
PROPOSED HYDROELECTRIC LOGBOOK STANDARDS**

Pursuant to the procedural schedule set forth in the California Electricity Generation Facilities Standards Committee's ("Committee") May 9, 2003 letter, Southern California Edison Company ("SCE") and Pacific Gas and Electric Company ("PG&E") submit the following reply comments regarding proposed hydroelectric logbook standards. In both SCE's and PG&E's May 19, 2003 comments, the utilities expressed their concerns over the Committee's proposed generating facility logbook standards for hydroelectric plants. Both utilities have internal logbook standards, which are subject to the Commission's review and audit, and therefore do not believe that additional standards are necessary. In addition, as pointed out by the utilities, the Committee's proposed standards are not practical because they do not take into account the nature and operating parameters of the utilities' respective hydroelectric generating units.

Notwithstanding the utilities' belief that additional standards are unnecessary, as indicated in SCE's and PG&E's comments,<sup>1</sup> the utilities have been working together to develop alternative standards for the Committee's

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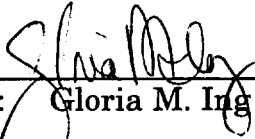
<sup>1</sup> PG&E's May 19, 2003 comments, pp. 1-2, SCE's May 19, 2003 comments, p. 5.



standards set forth in Attachment A and adopt them instead of the proposed standards set forth in the Committee's May 9, 2003 letter.

Respectfully submitted,

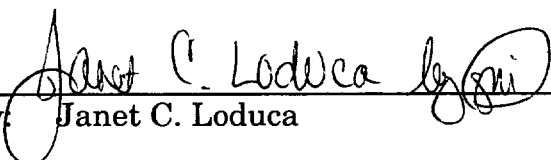
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May 23, 2003  
LW031420037

## **ATTACHMENT A**

### **PG&E AND SCE'S ALTERNATIVE PROPOSAL FOR HYDROELECTRIC LOGBOOK STANDARDS**

#### **I. PURPOSE**

The intent of this document is to define requirements for operation logs for attended and unattended hydroelectric generating facilities. These standards are intended to ensure that operating information associated with normal operation, testing, and abnormal activities is properly recorded.

#### **II. REQUIRED INFORMATION**

##### **A. Attended Facilities and Switching Centers**

Operators of hydroelectric generating facilities shall maintain logs at all Attended Stations and Switching Centers. The Attended Station and Switching Centers logs will be the chronological record of the operation and activities that occur either at the Attended Station or within the jurisdiction of the Switching Center, respectively. The log shall contain all pertinent information including but not limited to the following, as applicable:

- Orders received and transmitted;
- Operation-related communications;
- Relay operations;
- Water regulation (e.g., downstream water requirements, license requirements);
- Unit separation and parallel times;
- Directed load changes;
- Clearances/Work authorizations
- Reporting on and off clearances;
- Start and completion of switching operations;
- Application, removal, moving, location and number of grounds;
- Site emergency activities;
- Trouble reports;
- Daily Operations, including unit outages and de-ratings, Automatic Voltage Regulator/Power System Stabilizer operations, voltage operations, governor operations, and black-start operations, if applicable;
- System setups.

Each entry shall include the time of event, location, and description of event including, as relevant, the equipment involved, loads and other readings, voltage orders, directed load changes, deviations, weather, annunciator drops, alarms or other indications, relay target information including device number, limitations, notifications, and corrective actions.

**B. Unattended Stations**

Operators of hydroelectric generating facilities shall maintain logs at all Unattended Stations. Entries in the Unattended Station logs will be made consecutively. Logs entries shall include the following information, as applicable

- Time and date;
- Name(s) of personnel entering the station;
- Location of event;
- Text description of event/reason for entering station;
- All information pertinent to event, including but not limited to equipment involved, loads and other readings, voltage orders, directed load changes, deviations, weather, annunciator drops, alarms or other indications, relay target information including device number, curtailments, limitations, notifications, corrective actions;
- Application, removal, moving, location and number of grounds;
- Clearances/Work authorizations.



**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 **Southern California Edison Company and Pacific Gas and Electric Company's Reply Comments On The California Electricity Generation Facilities Standards Committee's Proposed Hydroelectric Logbook Standards** 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 **23rd day of May, 2003**, at Rosemead, California.



\_\_\_\_\_  
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