



SOUTHERN CALIFORNIA  
**EDISON**

An EDISON INTERNATIONAL Company

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June 16, 2004

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Carl Wood  
Commissioner  
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San Francisco, CA 94102  
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RE: Southern California Edison Company's Comments On The California Electricity Generation Facilities Standards Committee's Proposed Revision to General Duty Standard No. 4

Dear Committee Members:

Pursuant to the procedural schedule set forth in the June 7, 2004 letter from Commissioner Carl Wood, Southern California Edison Company ("SCE") submits the following comments on the Committee's proposed and revised General Duty Standard ("GDS") 4.

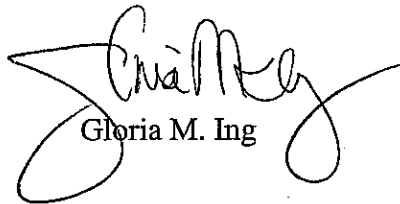
Proposed GDS 4 is overly prescriptive and goes beyond a general duty standard, which, by definition, are suppose to be general in nature. In contrast to the general duty standards adopted by the Commission in D. 04-05-018, GDS 4 would impose specific and unnecessary requirements on generation facility owners, such as requiring 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. SCE submits that these requirements are not only overly prescriptive but also duplicative. GDS 4's apparent goal of requiring facilities to be maintained for safe and reliable electricity supply is already accomplished in GDS 1-3, and generators have an existing obligation to notify the ISO of forced outages.

In addition, proposed GDS 4 is not practical. GDS 4 would require the generator owner to seek a joint, affirmative declaration from the CAISO and CPUC before taking a scheduled outage. Such a requirement lacks detail as to how this proposed joint decision making

would be implemented. As discussed earlier, such a prescriptive requirement is not necessary or appropriate for a general duty standard.

Finally, the requirement that generator owners consult with the CAISO when "making a decision about taking a forced outage" is unreasonable and prescriptive. Although generators are obligated to notify the CAISO of forced outages, they are not obligated to "consult" with the CAISO in the decision making process. SCE believes that this distinction is important, as SCE questions whether the CAISO would want to be placed in a consulting role and take on the corresponding responsibility for any consequences of such a decision.

Very truly yours,



Gloria M. Ing

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Enclosures

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

## CALIFORNIA ELECTRICITY GENERATION FACILITIES STANDARDS COMMITTEE



June 7, 2004

**TO: PARTICIPANTS BEFORE THE COMMITTEE**

This letter distributes a revised General Duty Standard for Operation and Maintenance (GDS) No. 4 for consideration and comment. It similarly distributes a draft proposed resolution that may later be presented to the California Electricity Generation Facilities Standards Committee (Committee).

Participants before the Committee and the public may serve comments and reply comments. Comments shall be served within 9 days of the date of this letter, and reply comments within 5 days of the date of comments. To assist in the preparation of comments, attached to this letter is some brief background information, the proposal, and information on service of comments.

Consistent with Committee-adopted procedures, this letter is served today by electronic mail. In addition, paper copies are served today on those without electronic mail addresses, and will be served on those who call Administrative Law Judge Mattson at 415-703-2504 and request a copy.

Sincerely,

/s/ CARL WOOD

CARL WOOD

Presiding Officer

Attachments

cc: Committee Member Kahn  
Committee Member Bjorklund  
Commissioner Lynch  
Commissioner Brown

Commissioner Peevey  
Commissioner Kennedy  
Commission File R.02-11-039