

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA



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Order Instituting Rulemaking to  
Implement Commission Regulations  
Relating to the Safety of Electric Utility  
Substations.

R.10-09-001  
(Filed September 2, 2010)

**JOINT SUR-REPLY OF PACIFIC GAS AND ELECTRIC COMPANY (U39E),  
PACIFICORP (U901E), SAN DIEGO GAS & ELECTRIC COMPANY (U902E),  
SOUTHERN CALIFORNIA EDISON COMPANY (U338-E), AND SIERRA PACIFIC  
POWER COMPANY (U903E) TO THE REPLY COMMENTS OF THE CITY AND  
COUNTY OF SAN FRANCISCO**

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**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to  
Implement Commission Regulations  
Relating to the Safety of Electric Utility  
Substations.

R.10-09-001  
(Filed September 2, 2010)

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SOUTHERN CALIFORNIA EDISON COMPANY (U338-E), AND SIERRA PACIFIC  
POWER COMPANY (U903E) TO THE REPLY COMMENTS OF THE CITY AND  
COUNTY OF SAN FRANCISCO**

Pursuant to Rules 6.2 and 6.3 (among others, as appropriate) of the California Public Utility Commission's Rules of Practice and Procedure, Pacific Gas and Electric Company (PG&E), PacifiCorp, San Diego Gas & Electric Company (SDG&E), Southern California Edison Company (SCE), and Sierra Pacific Power Company (Sierra Pacific)<sup>1</sup> (collectively, the IOUs) hereby respectfully submit this joint sur-reply to the reply comments of the City and County of San Francisco (CCSF) regarding the Commission's Proposed Substation General Order (Proposed Substation Inspection GO) (*Order Instituting Rulemaking to Implement Commission Regulations Relating to Safety of Electric Utility Substations* (OIR), September 2, 2010).

On October 8, 2010, the IOUs jointly filed opening comments to express support for the Proposed Substation Inspection GO as written. Parties, including the IOUs, filed reply comments on October 25, 2010. CCSF also filed reply comments on October 25, 2010; however, CCSF had not previously filed opening comments. Pursuant to their concurrently filed Motion for Leave to File Sur-Reply, the IOUs hereby provide their sur-reply to the reply comments submitted by CCSF to the OIR in this proceeding.

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<sup>1</sup> Also referred to as "NV Energy North" in the September 2, 2010 *Order Instituting Rulemaking to Implement Commission Regulations Relating to Safety of Electric Utility Substations* (OIR), pp. 3-4, fn.1.

**I. CCSF’S REPLY COMMENTS CONTAIN NEW SUBSTANTIVE MATTERS AND PROPOSALS THAT REQUIRE A RESPONSE.**

The Order Instituting Rulemaking that opened this proceeding was issued at the Commission’s meeting on September 2, 2010. According to the terms of that order, which is publicly available to any person or entity, October 8, 2010 was set as the date for receiving opening comments and October 25, 2010 for reply comments.<sup>2</sup> Opening comments were the proper time for parties to comment on the proposed new general order; while reply comments were the proper time for parties to respond to each other’s opening comments.<sup>3</sup> Further, Commission Rule of Practice and Procedure 6.2 requires that “[a]ny recommended changes to the proposed schedule” of an order instituting rulemaking be so stated in a party’s comments. CCSF did not file its opening comments according to the OIR’s schedule; instead, CCSF filed opening comments as reply comments, with substantive proposals to which the other parties cannot respond without seeking leave to do so. CCSF offers no explanation as to why it did not file opening comments. Moreover, CCSF states nothing in its reply comments that could not have been provided as opening comments. CCSF’s reply comments are nothing more than late-filed opening comments.

Although CCSF’s reply comments could be considered procedurally improper and could be accorded no weight,<sup>4</sup> rejected barring extraordinary circumstance<sup>5</sup> (which CCSF did not present here), or otherwise limited as circumstances warrant (at the Administrative Law Judge’s discretion),<sup>6</sup> the IOUs believe the better solution is simply to allow the IOUs to respond to the substantive points made by CCSF, which response follows below.

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<sup>2</sup> OIR, pp. 6-9, 11.

<sup>3</sup> OIR, p. 11, para.6; Commission Rule 6.2.

<sup>4</sup> See, e.g., D.06-11-048, p. 37.

<sup>5</sup> See, e.g. D.05-02-023, pp. 4-5.

<sup>6</sup> Commission Rule 1.4(c).

## **II. PARTICIPATION IN THE SUBSTATION WORKING GROUP WAS NOT RESTRICTED OR LIMITED TO ELECTRIC UTILITIES.**

CCSF complains about the stakeholder process which led to the development of the new Proposed Substation Inspection GO.<sup>7</sup> CCSF's criticism is unfounded. It is the understanding of the IOUs that the Consumer Protection and Safety Division (CPSD) extended a meeting invitation to investor and public owned electric utilities, cities, municipalities, and irrigation districts for the purpose of discussing the PG&E settlement of the Mission Substation Fire investigation and CPSD's intent to develop a new substation inspection general order. The entities who responded to the invitation then formed a working group comprising CPSD staff and representatives from the International Brotherhood of Electrical Workers (IBEW) Locals 47 and 1245, Los Angeles Department of Water and Power (LADWP), and five investor owned utilities. This working group met in person and via teleconference on multiple occasions in an attempt to reach consensus on a proposal. The lack of participation by CCSF (or any other party) does not diminish the working group's good faith efforts at achieving consensus or the Proposed Substation Inspection GO, which was the result of the working group process.

Moreover, the substation working group comprised parties with the technical and regulatory expertise to develop a robust substation inspection program. CCSF has not indicated it would have been able to supplement the working group's expertise.

## **III. CCSF'S PROPOSALS EXCEED THE SCOPE OF THE SETTLEMENT AND THE OIR.**

The discussions that led to the development of the Proposed Substation Inspection GO arose out of the CPSD-PG&E settlement in D.06-02-003. In reply comments, CCSF states it was a party to that settlement. As a party to the settlement, CCSF is aware that the settlement decision limited the scope of a (possible) future general order to a substation *inspection* program:

*Substation Inspection Program.* CPSD will determine how to spend the \$500,000 identified in paragraph 3(e) in support of a substation inspection program that will apply to all Commission-regulated electric utilities. Expenditures may include, but are not

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<sup>7</sup> CCSF Reply Comments, pp. 5-6.

limited to, hiring one or more independent consultants to: (a) develop guidelines for a substation inspection program, (b) draft a general order to be considered by stakeholders and the Commission in a rulemaking proceeding, and/or (c) perform inspections of utility-owned substations.<sup>8</sup>

CCSF's comments request additions to the Proposed Substation Inspection GO that fall far outside the scope of a substation inspection program, which was the agreed-upon remedy in the D.06-02-003 settlement. Their comments are inconsistent with the very terms of the agreement to which they were a party.

#### **IV. CCSF'S PROPOSALS ARE UNNECESSARY AND SHOULD NOT BE ADOPTED.**

The Proposed Substation Inspection GO, as written, satisfies the Commission's goal of a robust substation inspection program.<sup>9</sup> CCSF asks the Commission to consider several new provisions – each of which is unnecessary. The first would require utilities to have a site safety plan for each substation.<sup>10</sup> However, the Commission already requires electric utilities subject to its jurisdiction to meet the requirements of General Order 166 (GO 166), the purpose of which is to: ... *[e]nsure that jurisdictional electric utilities are prepared for emergencies and disasters in order to minimize damage and inconvenience to the public which may occur as a result of electric system failures, major outages, or hazards posed by damage to electric distribution facilities.*<sup>11</sup> Because there is no regulatory gap, it is not necessary to supplement the proposed new substation GO with rules pertaining to site safety plans.

More specifically, Standard 10 of GO 166 requires that utilities: *"...shall annually coordinate emergency preparations with appropriate state, county and local agencies and the ISO/TO. As part of such activities, the utility shall establish and confirm contacts and communication channels, plan the exchange of emergency planning and response information, and participate in emergency exercises or training."* While GO 166 does not require site safety plans for each substation, it is clear that such a requirement is more appropriately addressed in

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<sup>8</sup> D.06-02-003 Attachment A Settlement Agreement, pp. 10-11, para. 8.

<sup>9</sup> OIR (R.10-09-001), p. 5; CSPD Opening Comments, p. 3.

<sup>10</sup> CCSF Reply Comments, pp. 3-4.

<sup>11</sup> General Order 166 (Standards for Operation, Reliability, and Safety During Emergencies and Disasters).

the context of GO 166, the GO for *safety during emergencies*, rather than the Proposed Substation Inspection GO, which addresses substation *inspection* requirements.

The remaining CCSF proposals are also addressed by other provisions of the Proposed Substation Inspection GO, or by other regulations. Thus, adopting CCSF's proposals would lead to the regulatory redundancy and jurisdictional overlap that the Proposed Substation Inspection GO is designed to avoid. For example, CCSF wants a "remedial requirement" rule requiring the development of recommendations to prevent reoccurrence of major failures or fires. The Commission already has investigative authority and already may require (and has required in many cases) corrective actions. Further regulation restating what the Commission can already do today would be redundant.

CCSF also proposes new requirements for the safety of first responders, including identifying "any hazardous materials at the substation site and any special measures that need to be taken in the event of a failure event to prevent or mitigate harm from such materials."<sup>12</sup> For SDG&E, a site safety plan is already implemented in its Hazardous Materials Business Plan, which identifies hazardous materials and is completed for each substation as required by California Health and Safety Code Section 25500, et seq. The County of San Diego performs periodic inspections of SDG&E's substations including the Business Plan, also in accordance with the Code. SCE, too, has already implemented site specific Facility Emergency Action Plans at its substations, as well as Fire Prevention Plans and several other safety standards. In addition, like SDG&E, local authorities perform inspections of SCE substations in accordance with the Health and Safety Code.

Finally, PG&E has collaborated with San Francisco Fire Department (SFFD) to prepare fire pre-plans and fire entry procedures for indoor substations. Fire pre-plans for indoor substations in San Francisco were reviewed with SFFD and completed in 2004. Fire pre-plans and walk-through exercises with fire departments for various East Bay and non Bay Area indoor substations were also completed. The fire pre-plans show: 1) the layout of the building by floor,

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<sup>12</sup> CCSF Reply, p. 3.

and includes the arrangement of major electrical equipment and station batteries; and 2) all access routes and exits. The pre-plans are stored in a wall-mounted cabinet inside the station near the designated access door. Additionally, every PG&E substation has a hazardous material business plan in the control room and an emergency contact list specific to the substation with directions to the substation to lead police or fire crews to the substation. Providing what CCSF requests would cause overlap and possible confusion among first responders in this key area.

Further, circumstances for first responders differ in each IOU's service territory. For example, SDG&E has only one indoor substation. The rest are outdoor substations. SDG&E has also coordinated with local fire departments where substations are located to provide training on how to respond to events at substations, including providing a 2006 DVD developed by SDG&E titled "Substation Emergency Safety Training." In SCE's service territory, its Fire Management group has provided the SCE 2005 Safety Awareness DVD titled "Electrical Safety for First Responders" to all fire and law enforcement agencies with jurisdiction in SCE's service territory. Additionally, SCE provides in-person classes to any requesting first responder agencies. PG&E's Public Safety program also has a class and training materials for first responders and provides this training to any requesting first responder agency within the PG&E service territory. Since December 2009, PG&E has delivered its "*Responding to Gas & Electric Emergencies*" class to 550 emergency personnel (including, fire, police, Community Emergency Response Teams (CERT), public works, and the U.S. Department of Homeland Security), attending one of 19 train-the-trainer classes. Based on information provided by attendees, they are responsible for training over 10,000 additional emergency personnel in Northern California.

In Section IV of its comments, CCSF recommends "*Facilities inspected*" be added to the proposed Rule 33.1 and that proposed Rule 12 be modified to insert the words "*should be known.*"<sup>13</sup> Both suggestions are inappropriate and unnecessary. Regarding Rule 12, addition of the phrase "should be known" would, among other issues, lead to a rule that is impermissibly vague, impossible to comply with, and impossible to enforce. Moreover, Rule 12 as currently

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<sup>13</sup> CCSF Reply Comments, pp. 4-5.

proposed mirrors existing GO 95 Rule 31.1 and GO 128 Rule 17.1. This language was included expressly to ensure consistency among the applicable regulations. CCSF's modification assumes that events occurring within an electric utility's substations (as opposed to its overhead and underground distribution systems governed by GO 95 and GO 128) are always predictable. This is simply not the case. Thus, the Commission should reject CCSF's proposal to require the utilities to accurately predict the future with respect to their substations.

With respect to CCSF's proposed modification to Rule 33.1, Rule 32 already lists what facilities must be inspected, so adding a redundant requirement to Rule 33.1 is unnecessarily cumbersome. In addition, proposed Rule 30.1 would require each utility to establish, update as needed, and follow an Inspection Program. Since the facilities within each substation vary within a utility's service territory, the Proposed Substation Inspection GO appropriately allows each utility to customize and expand its Inspection Program as needed, with the understanding that the requirements of proposed Rules 30 through 33 (inclusive) are met. Thus, the language of the Proposed Substation Inspection GO already addresses CCSF's concerns, rendering moot its proposed changes.

**V. CONCLUSION**

For all the reasons addressed herein and in their opening and reply comments, the IOUs request that the Commission approve *as written* the Proposed Substation Inspection GO included with the OIR as Attachment B.

Respectfully submitted,<sup>14</sup>

By:           /s/ Laura M. Earl            
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November 5, 2010

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<sup>14</sup> By this signature, pursuant to Rule 1.8(d), the signer certifies that she is fully authorized to sign and tender this document on behalf of the parties/persons identified in the title of this document and to make the representations stated in Rule 1.8(b) on their behalf.

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of **JOINT SUR-REPLY OF PACIFIC GAS AND ELECTRIC COMPANY (U39E), PACIFICORP (U901E), SAN DIEGO GAS & ELECTRIC COMPANY (U902E), SOUTHERN CALIFORNIA EDISON COMPANY (U338-E), AND SIERRA PACIFIC POWER COMPANY (U903E) TO THE REPLY COMMENTS OF THE CITY AND COUNTY OF SAN FRANCISCO** has been electronically mailed to each party of record of the service list in R.10-09-001. Any party on the service list who has not provided an electronic mail address was served by placing copies in properly addressed and sealed envelopes and by depositing such envelopes in the United States Mail with first-class postage prepaid.

Copies were also sent via Federal Express to the assigned Administrative Law Judges and Commissioner.

Executed this 5th day of November, 2010 at San Diego, California.

          /s/ Jenny Norin          

Jenny Norin



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