

April 28, 2010

Ms. Kimberly Bose  
Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, D.C. 20426

**Re: NERC Notice of Penalty regarding Pacific Gas and Electric Company  
FERC Docket No. NP10-\_-000**

Dear Ms. Bose:

The North American Electric Reliability Corporation (NERC) hereby provides this Notice of Penalty<sup>1</sup> regarding Pacific Gas and Electric Company (PG&E),<sup>2</sup> NERC Registry ID NCR05299,<sup>3</sup> in accordance with the Federal Energy Regulatory Commission's (Commission or FERC) rules, regulations and orders, as well as NERC Rules of Procedure including Appendix 4C (NERC Compliance Monitoring and Enforcement Program (CMEP)).<sup>4</sup>

On December 30, 2008, PG&E self-reported to the Western Electricity Coordinating Council (WECC) non-compliance with PRC-017-0 Requirement (R) 1, specifically R1.6, because it could not locate maintenance records for some of its Special Protection Systems (SPS) communications equipment. On June 8, 2009, PG&E self-reported to WECC non-compliance

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<sup>1</sup> *Rules Concerning Certification of the Electric Reliability Organization; and Procedures for the Establishment, Approval, and Enforcement of Electric Reliability Standards* (Order No. 672), III FERC Stats. & Regs. ¶ 31,204 (2006); *Notice of New Docket Prefix "NP" for Notices of Penalty Filed by the North American Electric Reliability Corporation*, Docket No. RM05-30-000 (February 7, 2008). See also 18 C.F.R. Part 39 (2010). *Mandatory Reliability Standards for the Bulk-Power System*, FERC Stats. & Regs. ¶ 31,242 (2007) (Order No. 693), *reh'g denied*, 120 FERC ¶ 61,053 (2007) (Order No. 693-A).

<sup>2</sup> On October 14, 2009, NERC submitted an Omnibus filing which addressed violations for certain registered entities including PG&E. On November 13, 2009, FERC issued an order stating it would not engage in further review of the violations addressed in the Omnibus Notice of Penalty. On July 31, 2009, NERC submitted a Notice of Penalty which addressed an alleged violation of FAC-003-1 R2 for PG&E. On August 26, 2009, FERC issued an order stating it would not engage in further review of the violation addressed in the July 31, 2009 Notice of Penalty.

<sup>3</sup> Western Electricity Coordinating Council (WECC) confirmed that Pacific Gas and Electric Company (PG&E) was included on the NERC Compliance Registry as a Distribution Provider, Generator Operator, Generator Owner, Load Serving Entity, Purchasing-Selling Entity, Resource Planner, Transmission Operator, Transmission Owner and Transmission Planner on June 17, 2007. On December 17, 2009, PG&E was registered as a Type 2 Joint Registration Organization (JRO00010) for the Transmission Operator function. As a Transmission Owner, Generator Owner and Distribution Provider, PG&E is subject to the requirements of Reliability Standard PRC-017-0 and, as a Transmission Owner and Distribution Provider, PG&E is subject to the requirements of Reliability Standard PRC-005-1.

<sup>4</sup> See 18 C.F.R. § 39.7(c)(2).

with PRC-005-1 R2, specifically R2.1, for its failure to maintain all of its Protection System<sup>5</sup> devices within defined maintenance intervals. This Notice of Penalty is being filed with the Commission because PG&E does not dispute the violations of PRC-017-0 R1.6 and PRC-005-1 R2.1 or the proposed eighty five thousand dollar (\$85,000) financial penalty to be assessed to PG&E. Accordingly, the violations identified as NERC Violation Tracking Identification Numbers WECC200801247 and WECC200901422 are Confirmed Violations, as that term is defined in the NERC Rules of Procedure and the CMEP.

### Statement of Findings Underlying the Violations

This Notice of Penalty incorporates the findings and justifications set forth in the Notice of Confirmed Violation and Proposed Penalty or Sanction (NOCV) issued on October 23, 2009, by WECC. The details of the findings and basis for the penalty are set forth herein. This Notice of Penalty filing contains the basis for approval of this Notice of Penalty by the NERC Board of Trustees Compliance Committee (BOTCC). In accordance with Section 39.7 of the Commission's Regulations, 18 C.F.R. § 39.7 (2007), NERC provides the following summary table identifying the Reliability Standard at issue in this Notice of Penalty.

Region	Registered Entity	NOC ID	NERC Violation ID	Reliability Std.	Req. (R)	VRF	Total Penalty (\$)
WECC	Pacific Gas and Electric Company	NOC-402	WECC200801247	PRC-017-0	1/1.6	Medium <sup>6</sup>	85,000
			WECC200901422	PRC-005-1	2/2.1 <sup>7</sup>	High	

#### PRC-017-0 R1

The purpose of Reliability Standard PRC-017-0 is to ensure that all SPS are properly designed, meet performance requirements, and are coordinated with other protection systems and to ensure that maintenance and testing programs are developed and misoperations are analyzed and corrected.

PRC-017-0 R1 requires a Transmission Owner, Generator Owner and Distribution Provider that owns an SPS, such as PG&E, to have a system maintenance and testing program(s) in place. Specifically, the program(s) shall include, among other things: (R1.6) Date last tested/maintained. PRC-017-0 R1.6 has a "Medium" Violation Risk Factor (VRF).

<sup>5</sup> The NERC Glossary of Terms Used in Reliability Standards, updated April 20, 2009, defines Protection System as "Protective relays, associated communication systems, voltage and current sensing devices, station batteries and DC control circuitry."

<sup>6</sup> PRC-017-0 R1, R1.1, R1.1.1, R1.1.2, R1.1.3, R1.1.4, R1.2, R1.3, R1.4 and R1.5 each have a "High" Violation Risk Factor (VRF) and PRC-017-0 R1.6 has a "Medium" VRF.

<sup>7</sup> PRC-005-1 R2 has a "Lower" VRF; R2.1 and R2.2 each have a "High" VRF. During a final review of the standards subsequent to the March 23, 2007 filing of the Version 1 VRFs, NERC identified that some standards requirements were missing VRFs; one of these include PRC-005-1 R2.1. On May 4, 2007, NERC assigned PRC-005 R2.1 a "High" VRF. In the Commission's June 26, 2007 Order on Violation Risk Factors, the Commission approved the PRC-005-1 R2.1 "High" VRF as filed. Therefore, the "High" VRF was in effect from June 26, 2007.

On December 30, 2008, as a result of an internal review, PGAE discovered a possible violation of PRC-017-0 R1, specifically R1.6, because it could not locate maintenance records pertaining to some communication equipment for the SPS known as the Pacific Intertie Remedial Action Scheme (RAS). PGAE stated that, although it was performing annual maintenance on its SPS and all equipment is tested to verify all inputs and outputs are functioning properly, including RAS, it was missing some maintenance records for RAS. The last test was performed in 2007.

WECC reviewed the Self-Report along with the findings of its subject matter experts and confirmed that a violation occurred because PGAE did not have documentation that it had conducted maintenance for some communication equipment as discussed above as required by PRC-017-0. Specifically, the dates PGAE last maintained the RAS for 2008 were not available in its maintenance and testing program. WECC also determined that PGAE's non-compliance did not create a serious or substantial risk to the bulk power system (BPS) because the violation was documentation related. The documentation issues were a result of inadvertent communication issues among responsible personnel and the transition from previous storage at substations to a central documentation repository system.

WECC determined that the violation duration for PRC-017-0 R1.6 began on June 18, 2007, the date the Standard became enforceable, and will continue until PGAE completes its Mitigation Plan which is approved to be completed by August 1, 2010.

#### PRC-005-1 R2.1

The purpose of Reliability Standard PRC-005-1 is to ensure all transmission and generation Protection Systems affecting the reliability of the BPS are maintained and tested.

PRC-005-1 R2 requires each Transmission Owner and any Distribution Provider that owns a transmission Protection System and each Generator Owner that owns a generation Protection System, such as PGAE, to provide documentation of its Protection System maintenance and testing program and the implementation of that program to its Regional Entity on request (within 30 calendar days). Specifically, PRC-005-1 R2.1 requires the documentation of the program implementation to include evidence that Protection System devices were maintained and tested within the defined intervals and PRC-005-1 R2.2 requires the documentation of the program implementation to include the date each Protection System device was last tested/maintained. PRC-005-1 R2.1 has a "High" VRF.

On June 8, 2009, PGAE self-reported a possible violation of PRC-005-1 R2 because it had completed or rescheduled 92 Protection System maintenance tasks beyond the applicable defined maintenance interval. PGAE stated that its non-compliance was the result of: (1) data inaccuracies within its work management system; (2) a failure to follow internal processes to ensure complete compliance with defined maintenance intervals; and (3) deficiencies in supervision of scheduling, system date management and performance of required maintenance.

WECC reviewed the Self-Report along with the findings of its subject matter experts and confirmed that a violation occurred because PGAE failed to maintain 92 out of approximately

12,000 of its Protection System devices within the maintenance intervals defined in PGAE's Protection System maintenance and testing program. WECC also determined that although PGAE's non-compliance posed a moderate risk to the BPS, it did not pose a serious or substantial risk to the BPS because the Protection System devices not tested in accordance with PGAE's established testing intervals represented a very small percentage of the total number of Protection System devices applicable to the subject Standards requirement and the most delinquent of the untested devices were outside of PGAE's defined intervals by, at most, approximately three months.

WECC determined that the violation duration for PRC-005-1 R2.1 was from March 7, 2009, the oldest past due date for PGAE's maintenance of its Protection System devices, until November 1, 2009, when PGAE completed its Mitigation Plan.

#### WECC's Determination of Penalty

WECC assessed an aggregate penalty of eighty five thousand dollars (\$85,000) for the referenced violations. In reaching this determination, WECC considered the following factors:

1. PGAE self-reported the violations;
2. the violations were PGAE's first occurrences of the instant Standards;
3. PGAE was cooperative throughout the compliance enforcement process;
4. there was no evidence of any attempt by PGAE to conceal the violation;
5. there was no evidence that PGAE's violation was intentional; and
6. the violations did not pose a serious or substantial risk to the BPS, as discussed above.

Therefore, WECC determined that, in this instance, the penalty amount of eighty five thousand dollars (\$85,000) is appropriate and bears a reasonable relation to the seriousness and duration of the subject violations.

#### **Status of Mitigation Plans<sup>8</sup>**

##### PRC-017-0 R1.6

PGAE's Mitigation Plan to address PRC-017-0 R1.6 was submitted to WECC on January 22, 2009, with a proposed completion date of August 1, 2010. The Mitigation Plan was accepted by WECC on February 2, 2009 and was approved by NERC on March 13, 2009. The Mitigation Plan is designated as MIT-08-1466 and was submitted as non-public information to FERC on March 17, 2009, in accordance with FERC orders.

The Mitigation Plan required PGAE to: (1) review lists of all the RAS and SPS within PGAE by May 1, 2009; (2) validate applicability of identified schemes (*i.e.* >100 kV, scheme is in service, *etc.*) and verify the basis for the schemes by May 1, 2009; (3) perform a Scheme Verification Process which requires detailed review of maintenance records to validate schemes by August 1,

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<sup>8</sup> See 18 C.F.R § 39.7(d)(7).

2009; (4) implement a maintenance records archive and retrieval system for communication work by November 1, 2009; (5) verify all equipment is documented in equipment registry with an asset number by November 1, 2009; (6) verify all asset numbered equipment has work management plans (recurring work tasks) developed as required by the Maintenance Program where the maintenance records from the Scheme Verification Process are uploaded into the equipment registry by November 1, 2009; (7) update system maintenance and testing procedures by February 1, 2010; (8) complete any required maintenance work by May 1, 2010; and (9) complete functional testing and update all maintenance and testing records by August 1, 2010.

#### PRC-005-1 R2.1

PGAE's Mitigation Plan to address PRC-005-1 R2.1 was submitted to WECC on June 22, 2009 with a proposed completion date of November 1, 2009. The Mitigation Plan was accepted by WECC on July 31, 2009 and was approved by NERC on August 19, 2009. The Mitigation Plan is designated as MIT-09-1886 and was submitted as non-public information to FERC on August 19, 2009, in accordance with FERC orders.

The Mitigation Plan required PGAE to include specific tasks to improve the oversight and monitoring by maintenance personnel. These improvements would provide increased visibility, performance metrics and clear expectations to ensure protection system maintenance and testing is performed in accordance with PGAE program standards and within specified maintenance and testing intervals. The mitigating actions required PGAE to: (1) provide clear expectations and management oversight to ensure accountability for timely performance of Protection System maintenance and testing work; (2) create quality controls to track the status of system Protection System maintenance completion, including issuance of reports to senior management on current status of maintenance and testing work; (3) implement a formal process to correct work management database inaccuracies and update records for all transmission Protection Systems on a recurring basis to ensure that all maintenance and testing intervals are correctly input and data quality is maintained; and (4) ensure that all maintenance tasks are up to date.

On November 2, 2009, PGAE certified that its Mitigation Plan was completed on November 1, 2009. PGAE submitted the following documents as evidence of completion: (1) *Communication Tailboard and Training Records*; (2) *Program Controls*; (3) *Work Management Program Data Quality Improvements*; and (4) *Protective System Maintenance Record*.

On November 18, 2009, after WECC's review of PGAE's submitted evidence, WECC verified that the Mitigation Plan was completed and PGAE was in compliance with PRC-005-1 R2.1.

### **Statement Describing the Proposed Penalty, Sanction or Enforcement Action Imposed<sup>9</sup>**

#### **Basis for Determination**

Taking into consideration the Commission's direction in Order No. 693, the NERC Sanction Guidelines and the Commission's July 3, 2008 Guidance Order,<sup>10</sup> the NERC BOTCC reviewed

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<sup>9</sup> See 18 C.F.R. § 39.7(d)(4).

the NOCV and supporting documentation on March 10, 2010. The NERC BOTCC approved the assessment of an eighty five thousand dollar (\$85,000) financial penalty against PGAE based upon WECC's findings and determinations, the NERC BOTCC's review of the applicable requirements of the Commission-approved Reliability Standards and the underlying facts and circumstances of the violations at issue.

In reaching this determination, the NERC BOTCC considered the following:

1. The violations were self-reported;
2. The violations were the first violations by PGAE of the subject Standards;
3. WECC reported PGAE was cooperative throughout the compliance enforcement process;
4. There was no evidence of any attempt by PGAE to conceal the violations;
5. There was no evidence that PGAE's violations were intentional; and
6. The violations did not pose a serious or substantial risk to the BPS, as discussed above.

For the foregoing reasons, the NERC BOTCC believes that the proposed eighty five thousand dollar (\$85,000) penalty amount is appropriate for the violations and circumstances in question, and is consistent with NERC's goal to promote and ensure reliability of the BPS.

Pursuant to Order No. 693, the penalty will be effective upon expiration of the thirty (30) day period following the filing of this Notice of Penalty with FERC, or, if FERC decides to review the penalty, upon final determination by FERC.

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<sup>10</sup> *North American Electric Reliability Corporation*, "Guidance Order on Reliability Notices of Penalty," 124 FERC ¶ 61,015 (2008).



### **Attachments Included as Part of the Notice of Penalty**

The attachments included as part of this Notice of Penalty are the following documents and material:

- a) PG&E's Self-Report for PRC-017-0 R1.6 dated December 30, 2008, included as Attachment a;
- b) PG&E's Self-Report for PRC-005-1 R2.1 dated June 8, 2009, included as Attachment b;
- c) PG&E's response to the Notice of Alleged Violation and Proposed Penalty or Sanction dated October 14, 2009, included as Attachment c;
- d) PG&E's Mitigation Plan designated as MIT-08-1466 for PRC-017-0 R1.6 submitted January 22, 2009, included as Attachment d;
- e) PG&E's Mitigation Plan designated as MIT-09-1886 for PRC-005-1 R2.1 submitted June 22, 2009, included as Attachment e;
- f) PG&E's Certification of Completion for PRC-005-1 R2.1 dated November 2, 2009, included as Attachment f; and
- g) WECC's Verification of Completion of the Mitigation Plan for PRC-005-1 R2.1 dated November 18, 2009, included as Attachment g.

### **A Form of Notice Suitable for Publication<sup>11</sup>**

A copy of a notice suitable for publication is included in Attachment h.

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<sup>11</sup> See 18 C.F.R. § 39.7(d)(6).

### Notices and Communications

Notices and communications with respect to this filing may be addressed to the following:

<p>Gerald W. Cauley* President and Chief Executive Officer David N. Cook* Vice President and General Counsel North American Electric Reliability Corporation 116-390 Village Boulevard Princeton, N.J. 08540-5721 (609) 452-8060 (609) 452-9550 – facsimile gerry.cauley@nerc.net david.cook@nerc.net</p> <p>Christopher Luras* Manager of Compliance Enforcement Western Electricity Coordinating Council 615 Arapeen Drive, Suite 210 Salt Lake City, UT 84108-1262 (801) 883-6887 (801) 883-6894 – facsimile CLuras@wecc.biz</p> <p>Ed Salas* Senior Vice President, Engineering and Operations Pacific Gas and Electric Company 77 Beale Street San Francisco, CA 94105 (415) 973-2020 (415) 973-4800 – facsimile easw@pge.com</p> <p>John Hagen* Manager, NERC Compliance Pacific Gas and Electric Company 77 Beale Street San Francisco, CA 94105 (415) 973-7356 (415) 973-3479 – facsimile Jhh4@pge.com</p> <p>*Persons to be included on the Commission's service list are indicated with an asterisk. NERC requests waiver of the Commission's rules and regulations to permit the inclusion of more than two people on the service list.</p>	<p>Rebecca J. Michael* Assistant General Counsel Holly A. Hawkins* Attorney North American Electric Reliability Corporation 1120 G Street, N.W. Suite 990 Washington, D.C. 20005-3801 (202) 393-3998 (202) 393-3955 – facsimile rebecca.michael@nerc.net holly.hawkins@nerc.net</p> <p>Louise McCarren* Chief Executive Officer Western Electricity Coordinating Council 615 Arapeen Drive, Suite 210 Salt Lake City, UT 84108-1262 (801) 883-6868 (801) 582-3918 – facsimile Louise@wecc.biz</p> <p>Steven Goodwill* Associate General Counsel Western Electricity Coordinating Council 615 Arapeen Drive, Suite 210 Salt Lake City, UT 84108-1262 (801) 883-6857 (801) 883-6894 – facsimile SGoodwill@wecc.biz</p> <p>Constance White* Vice President of Compliance Western Electricity Coordinating Council 615 Arapeen Drive, Suite 210 Salt Lake City, UT 84108-1262 (801) 883-6885 (801) 883-6894 – facsimile CWhite@wecc.biz</p>
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## Conclusion

NERC respectfully requests that the Commission accept this Notice of Penalty as compliant with its rules, regulations and orders.

Respectfully submitted,

Gerald W. Cauley  
President and Chief Executive Officer  
David N. Cook  
Vice President and General Counsel  
North American Electric Reliability Corporation  
116-390 Village Boulevard  
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/s/ Rebecca J. Michael  
Rebecca J. Michael  
Assistant General Counsel  
Holly A. Hawkins  
Attorney  
North American Electric Reliability  
Corporation  
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holly.hawkins@nerc.net

cc: Pacific Gas and Electric Company  
Western Electricity Coordinating Council

Attachments

## **Attachment a**

### **PG&E's Self-Report for PRC-017-0 R1.6 dated December 30, 2008**



**CONFIDENTIAL**

## **Compliance Violation Self-Reporting Form**

Please complete an individual Self-Reporting Form for each NERC Reliability Standard that indicates any level(s) of non-compliance and return to [Compliance@WECC.biz](mailto:Compliance@WECC.biz)

Registered Entity Name: Pacific Gas and Electric Company

Contact Name: John Hagen

Contact Phone: 415-973-7356

Contact email: jhh4@pge.com

Date noncompliance was discovered: December 11, 2008

Date noncompliance was reported: December 30, 2008

Standard Title: Special Protection System Maintenance and Testing

Standard Number: PRC-017

Requirement Number(s)<sup>1</sup>: R1

How was the noncompliance found? (e.g. Routine Readiness Evaluation, Self-evaluation, Internal Audit, etc.)

Pacific Gas and Electric Company has recently determined that some maintenance records for communication equipment for the Pacific Intertie Remedial Action Scheme (RAS) cannot be located, although the maintenance work is being performed. A complete functional test of the system is performed on an annual basis, and all equipment is tested to verify all inputs and outputs are functioning properly. The last test was performed in 2007.

Pacific Gas and Electric Company is also reviewing other SPSs that are not monitored by WECC RASRS to verify that they comply with PRC-017. The Mitigation Plan to be submitted for this self-report will address any documentation issues for these other SPSs as well as the PACI RAS communications equipment.

**\*Submit a Mitigation Plan in conjunction with this form to show that corrective steps are being taken within ten (10) business days. If a mitigation plan is not being submitted with this form please complete the following:**

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<sup>1</sup> Violations are on a per requirement basis.

Describe the cause of non-compliance:

The documentation issues are a result of inadvertent communications issues among responsible personnel and transition to a central documentation repository system from previous storage at substations.

Describe the reliability impact of this non-compliance:

There is minimal impact to the Bulk Electric System. This violation appears to be documentation related. A complete functional test of the PACI RAS is performed on an annual basis, and all equipment is tested to verify all inputs and outputs are functioning properly. The last test was performed in 2007.

Expected date of Mitigation Plan submittal: January 22, 2009

## **Attachment b**

**PG&E's Self-Report for PRC-005-1 R2.1 dated  
June 8, 2009**



**CONFIDENTIAL**

## **Compliance Violation Self-Reporting Form**

Please complete an individual Self-Reporting Form for each NERC Reliability Standard that indicates any level(s) of non-compliance and return to [Compliance@WECC.biz](mailto:Compliance@WECC.biz)

Registered Entity Name: Pacific Gas and Electric Company

Contact Name: John Hagen

Contact Phone: 415-973-7356

Contact email: jhh4@pge.com

Date noncompliance was discovered: June 1, 2009

Date noncompliance was reported: June 8, 2009

Standard Title: Generation and Transmission Protection System Maintenance and Testing

Standard Number: PRC-005

Requirement Number(s)<sup>1</sup>: **R2**

How was the noncompliance found? (e.g. Routine Readiness Evaluation, Self-evaluation, Internal Audit, etc.)

The non-compliance was initially discovered as a result of an internal Quality Assurance audit of several transmission substation maintenance headquarters, which was completed on May 6, 2009. A system wide review of all transmission protection system records within PG&E's work management system was then performed. That review identified that 92 protection system maintenance tasks were completed or scheduled beyond the specified maintenance interval.

**\*Submit a Mitigation Plan in conjunction with this form to show that corrective steps are being taken within ten (10) business days. If a mitigation plan is not being submitted with this form please complete the following:**

Describe the cause of non-compliance:

At this time, it appears that the primary causes of the non-compliance are: 1) data inaccuracies within the SAP work management system; 2) failure to follow internal processes to ensure 100%

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<sup>1</sup> Violations are on a per requirement basis.



compliance with the specified maintenance intervals; and 3) deficiencies in supervision of the scheduling, system data management and performance of the required maintenance.

Describe the reliability impact of this non-compliance:

There was no reliability event that resulted from this violation. The total number of late tasks represent less than one percent of the total population of transmission relay schemes in the maintenance program and, with a few exceptions that will be addressed in PG&E's mitigation plan, the required maintenance is now complete.

Expected date of Mitigation Plan submittal: June 22, 2009.

## **Attachment c**

### **PG&E's response to the Notice of Alleged Violation and Proposed Penalty or Sanction dated October 14, 2009**



**Pacific Gas and  
Electric Company®**

Edward A. Salas  
Senior Vice President  
Engineering & Operations

77 Beale Street, Room 3235  
San Francisco, CA 94105

*Mailing Address*  
Mail Code B32  
Pacific Gas and Electric Company  
P. O. Box 770000  
San Francisco, CA 94177

415.973.2020  
Internal: 223.2020  
Fax: 415.973.4800

October 14, 2009

Ms. Constance B. White  
Vice President of Compliance  
Western Electricity Coordinating Council  
615 Arapeen Drive, Ste. 210  
Salt Lake City, UT 84108-1262

Re: PG&E Notice of Alleged Violation and Proposed Penalty or Sanction  
dated September 22, 2009

In accordance with Section 5.2 of the Compliance Monitoring and Enforcement Program (CMEP), Pacific Gas and Electric Company elects to accept the Alleged Violations and Proposed Sanctions as identified in the above referenced NAVAPS and tracked as PG&E\_WECC20091594 and PG&E\_WECC20091359.

Pacific Gas and Electric Company currently has active Mitigation Plans in place for both Alleged Violations that have been approved by WECC. PG&E confirms that actions required to complete both Mitigation Plans are currently on schedule.

Pacific Gas and Electric Company remains committed to improving the reliability of the Bulk Electric System. The management of PG&E takes all violations of NERC Reliability Standards very seriously. As a result, we will continue to implement corrective actions that not only will remedy the immediate violation, but will prevent recurrence of the violation.

Please contact Pacific Gas and Electric Company's NERC Compliance Program Manager, John Hagen at 415-973-7356 to coordinate the development of the Notice of Confirmed Violation in accordance with the CMEP.

Sincerely,

## **Attachment d**

**PG&E's Mitigation Plan designated as MIT-08-1466 for PRC-017-0 R1.6 submitted January 22, 2009**



## Mitigation Plan Submittal Form

New ☒ or Revised ☐

Date this Mitigation Plan is being submitted: January 22, 2009

If this Mitigation Plan has already been completed:

- Check this box ☐ and
- Provide the Date of Completion of the Mitigation Plan:

### **Section A: Compliance Notices & Mitigation Plan Requirements**

- A.1 Notices and requirements applicable to Mitigation Plans and this Submittal Form are set forth in "Appendix A - Compliance Notices & Mitigation Plan Requirements" to this form. **Review the notices and check this box ☒ to indicate that you have reviewed and understand the information provided therein.** This Submittal Form and the Mitigation Plan submitted herein are incomplete and cannot be accepted unless the box is checked.

### **Section B: Registered Entity Information**

- B.1 Identify your organization:

Company Name: Pacific Gas and Electric Company  
Company Address: 77 Beale Street, San Francisco, CA 94105  
NERC Compliance Registry ID *[if known]*: NCR05299

- B.2 Identify the individual in your organization who will be the Entity Contact to WECC regarding this Mitigation Plan.

Name: John Hagen  
Title: Principal Project Manager  
Email: jhh4@pge.com  
Phone: 415-973-7356



### Section C: Identity of Reliability Standard Violations Associated with this Mitigation Plan

This Mitigation Plan is associated with the following violation(s) of the reliability standard listed below:

C.1 Standard: PRC-017  
*[Identify by Standard Acronym (e.g. FAC-001-1)]*

C.2 Requirement(s) violated and violation dates:  
*[Enter information in the following Table]*

NERC Violation ID # [if known]	WECC Violation ID # [if known ]	Requirement Violated (e.g. R3.2)	Violation Date <sup>(*)</sup> (MM/DD/YY)
		R1	12/30/2008

(\*) Note: The Violation Date shall be: (i) the violation occurred; (ii) the date that the violation was self-reported; or (iii) the date that the violation has been deemed to have occurred on by WECC. Questions regarding the date to use should be directed to the WECC.

C.3 Identify the cause of the violation(s) identified above:

Pacific Gas and Electric Company has recently determined that some maintenance records for communication equipment for the Pacific Intertie Remedial Action Scheme (RAS) cannot be located, although the maintenance work is being performed. A complete functional test of the system is performed on an annual basis, and all equipment is tested to verify all inputs and outputs are functioning properly. The last test was performed in 2007.

The documentation issues are a result of inadvertent communications issues among responsible personnel and transition to a central documentation repository system from previous storage at substations.

*[Provide your response here; additional detailed information may be provided as an attachment as necessary]*

C.4 **[Optional]** Provide any relevant additional information regarding the violations associated with this Mitigation Plan:





Pacific Gas and Electric Company is also reviewing other SPSs that are not monitored by WECC RASRS to verify that they comply with PRC-017. The Mitigation Plan to be submitted for this self-report will address any documentation issues for these other SPSs as well as the PACI RAS communications equipment.

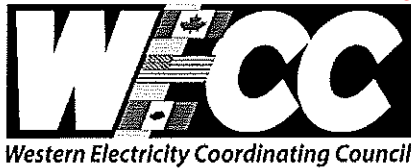
[Provide your response here; additional detailed information may be provided as an attachment as necessary]

## **Section D: Details of Proposed Mitigation Plan**

### **Mitigation Plan Contents**

D.1 Identify and describe the action plan, including specific tasks and actions that your organization is proposing to undertake, or which it undertook if this Mitigation Plan has been completed, to correct the violations identified above in Part C.2 of this form:

1. Review list of all RAS and SPS within PG&E.
2. Validate applicability of identified schemes (i.e. >100kV, scheme is in service, etc,) and verify the basis for the scheme.
3. Perform Scheme Verification Process (SVP) for the validated schemes. SVP requires detailed review of maintenance records by Maintenance Headquarters and by Substation.
4. Implement maintenance records archive and retrieval system for ISTS communication work.
5. Verify all equipment is documented in equipment registry (SAP) with an asset number.
6. Verify all asset numbered equipment has Work Management Plans (recurring work tasks) developed as required by the Maintenance Program. Maintenance records from SVP are uploaded into SAP.
7. Update system maintenance and testing procedures. Functional testing recurring work plans uploaded into SAP.
8. Maintenance work completed.



9. Functional testing complete, and all maintenance and testing records updated.

[Provide your response here; additional detailed information may be provided as an attachment as necessary]

**Check this box ☐ and proceed to Section E of this form if this Mitigation Plan, as set forth in Part D.1, has already been completed; otherwise respond to Part D.2, D.3 and, optionally, Part D.4, below.**

#### **Mitigation Plan Timeline and Milestones**

D.2 Provide the timetable for completion of the Mitigation Plan, including the completion date by which the Mitigation Plan will be fully implemented and the violations associated with this Mitigation Plan are corrected: August 1, 2010

D.3 Enter Milestone Activities, with completion dates, that your organization is proposing for this Mitigation Plan:

Milestone Activity	Proposed Completion Date* (shall not be more than 3 months apart)
1. Review list of all RAS and SPS within PG&E. 2. Validate applicability of identified schemes (i.e. >100kV, scheme is in service, etc.) and verify the basis for the scheme.	May 1, 2009
3. Perform Scheme Verification Process (SVP) for the validated schemes. SVP requires detailed review of maintenance records by Maint. Headquarters and Substation.	August 1, 2009
4. Implement maintenance record archive and retrieval system for ISTS communication maintenance work. 5. Verify all equipment is documented in equipment registry (SAP) with an asset number. 6. Verify all asset numbered equipment has Work Management Plans (recurring work plans) developed as required by the Maintenance Program.	November 1, 2009



All maintenance records from SVP uploaded into SAP.	
7. Update system maintenance and testing procedures. Functional testing recurring work plans uploaded into SAP.	February 1, 2010
8. Maintenance work completed.	May 1, 2010
9. Functional testing complete, maintenance and testing records updated.	August 1, 2010

(\*) Note: Implementation milestones no more than three (3) months apart for Mitigation Plans with expected completion dates more than three (3) months from the date of submission. Additional violations could be determined for not completing work associated with accepted milestones.

[Note: Provide your response here; additional detailed information may be provided as an attachment as necessary]

#### **Additional Relevant Information (Optional)**

D.4 If you have any relevant additional information that you wish to include regarding the mitigation plan, milestones, milestones dates and completion date proposed above you may include it here:

[Provide your response here; additional detailed information may be provided as an attachment as necessary]



## **Section E: Interim and Future Reliability Risk**

*Check this box ☐ and proceed and respond to Part E.2 and E.3, below, if this Mitigation Plan, as set forth in Part D.1, has already been completed.*

### **Abatement of Interim BPS Reliability Risk**

- E.1 While your organization is implementing the Mitigation Plan proposed in Part D of this form, the reliability of the Bulk Power System may remain at higher risk or be otherwise negatively impacted until the plan is successfully completed. To the extent they are, or may be, known or anticipated: (i) identify any such risks or impacts; and (ii) discuss any actions that your organization is planning to take or is proposing as part of the Mitigation Plan to mitigate any increased risk to the reliability of the bulk power system while the Mitigation Plan is being implemented:

There is minimal risk to the Bulk Power System during the implementation of this Mitigation Plan. The primary issue is documentation related.

[Provide your response here; additional detailed information may be provided as an attachment as necessary]

### **Prevention of Future BPS Reliability Risk**

- E.2 Describe how successful completion of the Mitigation Plan as laid out in Part D of this form will prevent or minimize the probability that your organization incurs further violations of the same or similar reliability standards requirements in the future:

Ensuring that Pacific Gas and Electric Company has the capability to maintain and retrieve maintenance records as documentation of compliance will prevent or minimize the probability of future violations.  
[Provide your response here; additional detailed information may be provided as an attachment as necessary]

- E.3 Your organization may be taking or planning other action, beyond that listed in the Mitigation Plan, as proposed in Part D.1, to prevent or minimize the probability of incurring further violations of the same or similar standards requirements listed in Part C.2, or of other reliability



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standards. If so, identify and describe any such action, including milestones and completion dates:

Pacific Gas and Electric Company remains committed to improving reliability of the Bulk Electric System by improving its standards and procedures, performing its work in accordance with those procedures, and maintaining a record of evidence documenting that we have done it, [Provide your response here; additional detailed information may be provided as an attachment as necessary]



## Section F: Authorization

An authorized individual must sign and date this Mitigation Plan Submittal Form. By doing so, this individual, on behalf of your organization:

- a) Submits the Mitigation Plan, as laid out in Section D of this form, to WECC for acceptance by WECC and approval by NERC, and
- b) If applicable, certifies that the Mitigation Plan, as laid out in Section D of this form, was completed (i) as laid out in Section D of this form and (ii) on or before the date provided as the 'Date of Completion of the Mitigation Plan' on this form, and
- c) Acknowledges:
  1. I am Senior Vice President of Pacific Gas and Electric Company.
  2. I am qualified to sign this Mitigation Plan on behalf of Pacific Gas and Electric Company.
  3. I have read and understand Pacific Gas and Electric Company's obligations to comply with Mitigation Plan requirements and ERO remedial action directives as well as ERO documents, including, but not limited to, the NERC Rules of Procedure, including Appendix 4(C) (Compliance Monitoring and Enforcement Program of the North American Electric Reliability Corporation" (NERC CMEP)).
  4. I have read and am familiar with the contents of the foregoing Mitigation Plan.
  5. Pacific Gas and Electric Company agrees to be bound by, and comply with, the Mitigation Plan, including the timetable completion date, as approved by WECC and approved by NERC.

Authorized Entity Officer Signature: \_\_\_\_\_

(Electronic signatures are acceptable; see CMEP)

Name (Print): Edward A. Salas

Title: Senior Vice President Engineering and Operations

Date: January 22, 2009





### **Section G: Comments and Additional Information**

You may use this area to provide comments or any additional relevant information not previously addressed in this form.

[Provide your response here; additional detailed information may be provided as an attachment as necessary]

Please direct any questions regarding completion of this form to:

Jim Stuart, Sr. Compliance Engineer  
Email: [jstuart@wecc.biz](mailto:jstuart@wecc.biz)  
Phone: (801) 883-6887



## **Attachment A – Compliance Notices & Mitigation Plan Requirements**

- I. Section 6.2 of the CMEP1 sets forth the information that must be included in a Mitigation Plan. The Mitigation Plan must include:
  - (1) The Registered Entity's point of contact for the Mitigation Plan, who shall be a person (i) responsible for filing the Mitigation Plan, (ii) technically knowledgeable regarding the Mitigation Plan, and (iii) authorized and competent to respond to questions regarding the status of the Mitigation Plan. This person may be the Registered Entity's point of contact described in Section 2.0.
  - (2) The Alleged or Confirmed Violation(s) of Reliability Standard(s) the Mitigation Plan will correct.
  - (3) The cause of the Alleged or Confirmed Violation(s).
  - (4) The Registered Entity's action plan to correct the Alleged or Confirmed Violation(s).
  - (5) The Registered Entity's action plan to prevent recurrence of the Alleged or Confirmed violation(s).
  - (6) The anticipated impact of the Mitigation Plan on the bulk power system reliability and an action plan to mitigate any increased risk to the reliability of the bulk power-system while the Mitigation Plan is being implemented.
  - (7) A timetable for completion of the Mitigation Plan including the completion date by which the Mitigation Plan will be fully implemented and the Alleged or Confirmed Violation(s) corrected.
  - (8) Implementation milestones no more than three (3) months apart for Mitigation Plans with expected completion dates more than three (3) months from the date of submission. Additional violations could be determined for not completing work associated with accepted milestones.
  - (9) Any other information deemed necessary or appropriate.
  - (10) The Mitigation Plan shall be signed by an officer, employee, attorney or other authorized representative of the Registered Entity, which if applicable, shall be the person that signed the Self-Certification or Self Reporting submittals.
- II. This submittal form may be used to provide a required Mitigation Plan for review and approval by WECC and NERC.

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<sup>1</sup> "Uniform Compliance Monitoring and Enforcement Program of the North American Electric Reliability Corporation;" a copy of the current version approved by the Federal Energy Regulatory Commission is posted on NERC's website.



- III. The Mitigation Plan shall be submitted to the WECC and NERC as confidential information in accordance with Section 1500 of the NERC Rules of Procedure.
- IV. This Mitigation Plan form may be used to address one or more related violations of one Reliability Standard. A separate mitigation plan is required to address violations with respect to each additional Reliability Standard, as applicable.
- V. If the Mitigation Plan is approved by WECC and NERC, a copy of this Mitigation Plan will be provided to the Federal Energy Regulatory Commission in accordance with applicable Commission rules, regulations and orders.
- VI. WECC or NERC may reject Mitigation Plans that they determine to be incomplete or inadequate.
- VII. Remedial action directives also may be issued as necessary to ensure reliability of the bulk power system.

## **Attachment e**

**PG&E's Mitigation Plan designated as MIT-09-1886 for PRC-005-1 R2.1 submitted June 22, 2009**



## Mitigation Plan Submittal Form

New ☒ or Revised ☐

Date of submittal: June 22, 2009

If this Mitigation Plan is complete:

- Check this box ☐
- Provide the Date of the Mitigation Plan Completion: November 1, 2009
- In order for the Mitigation Plan to be accepted for review the following items must be submitted along with this Mitigation Plan Submittal Form:
  - Evidence supporting full compliance
  - Sections A, B, C, D.1, E.2, E.3, and F must be completed in their entirety

### **Section A: Compliance Notices & Mitigation Plan Requirements**

- A.1 Notices and requirements applicable to Mitigation Plans and this Submittal Form are set forth in "Attachment A - Compliance Notices & Mitigation Plan Requirements" to this form. **Review Attachment A and check this box ☒ to indicate that you have reviewed and understand the information provided therein.** This Submittal Form and the Mitigation Plan submitted herein are incomplete and cannot be accepted unless the box is checked.

### **Section B: Registered Entity Information**

- B.1 Identify your organization:

Registered Entity Name: Pacific Gas and Electric Company  
Registered Entity Address: 77 Beale Street, San Francisco CA  
94105  
NERC Compliance Registry ID: NCR005299

- B.2 Identify the individual in your organization who will be the Entity Contact regarding this Mitigation Plan. Please see Section 6.2 of the WECC Compliance Monitoring and Enforcement Program (CMEP) for a description of the qualifications required of the Entity Contact.<sup>1</sup>

<sup>1</sup> A copy of the WECC CMEP is posted on WECC's website at [http://compliance.wecc.biz/Documents/Forms/03.06%20-%20WECC%20Mitigaton%20Plan%](http://compliance.wecc.biz/Documents/Forms/03.06%20-%20WECC%20Mitigaton%20Plan%20Form.pdf)  
Registered Entities are responsible for following all applicable WECC CMEP procedures. WECC



Name: John Hagen  
 Title: Manager, Engineering And Operations System Reliability  
 Email: jhh4@pge.com  
 Phone: 415-973-7356

### **Section C: Identity of Alleged or Confirmed Reliability Standard Violations Associated with this Mitigation Plan**

This Mitigation Plan is associated with the alleged or confirmed violation(s) of the reliability standard/requirements listed below:

C.1 Standard: PRC-005-01  
*[Identify by Standard Acronym (e.g. FAC-001-1)]*

C.2 Requirement(s) violated and violation dates:  
*[Enter information in the following Table]*

NERC Violation ID # [if known]	WECC Violation ID # [if known ]	Requirement Violated (e.g. R3)	Violation Risk Factor	Alleged or confirmed Violation Date <sup>(*)</sup> (MM/DD/YY)	Method of Detection (e.g. audit, self-report, investigation)
		R2.1	HIGH	06/01/09	SELF REPORT

(\*) Note: The Alleged or Confirmed Violation Date shall be: (i) the date the violation occurred; (ii) the date that the violation was self-reported; or (iii) the date upon which WECC has deemed the violation to have occurred. Please contact WECC if you have questions regarding which date to use.

C.3 Identify the cause of the alleged or confirmed violation(s) identified above:

PG&E has implemented a Protection System maintenance and testing program for transmission and generation Protection Systems that impact

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strongly recommends that registered entities become familiar with the WECC CMEP and its requirements, as they may be amended from time to time.





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the reliability of the bulk electric system that satisfies the requirements of R1. However, following a routine internal audit of substation maintenance, PG&E determined that some protection system maintenance tasks were completed or scheduled beyond the specified maintenance intervals, resulting in noncompliance with R2.1.

At this time, it appears that the primary causes of the non-compliance are: 1) data inaccuracies within the SAP work management system that in some cases made it appear that work had been completed when, in fact, it had not been; 2) failure to follow internal processes to ensure 100% compliance with the specified maintenance intervals; and 3) deficiencies in supervision of the scheduling, system date management and performance of the required maintenance.

[Provide your response here; additional detailed information may be provided as an attachment as necessary]

- C.4 **[Optional]** Provide any relevant additional information regarding the alleged or confirmed violations associated with this Mitigation Plan:

The non-compliance was initially discovered as a result of an internal Quality Assurance audit of several transmission substation maintenance headquarters, which was completed on May 6, 2009. A system wide review of all transmission protection system records within PG&E's work management system was then performed. That review identified that 92 protection system maintenance tasks were completed or scheduled to be maintained beyond the specified maintenance interval. Of these, 45 protection system maintenance tasks have been confirmed to be covered by PRC-005 and the PG&E protection system maintenance program.

[Provide your response here; additional detailed information may be provided as an attachment as necessary]

## **Section D: Details of Proposed Mitigation Plan**

### **Mitigation Plan Contents**

- D.1 Identify and describe the action plan, including specific tasks and actions that your organization is proposing to undertake, or which it undertook if this Mitigation Plan has been completed, to correct the violations identified above in Part C.2 of this form:

The mitigation plan will include specific tasks to improve the oversight and monitoring by maintenance personnel. These improvements will provide increased visibility, performance metrics and clear expectations to ensure protection system maintenance and testing is performed in



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accordance with PG&E program standards and within specified maintenance and testing intervals. Actions include:

- 1) Provide clear expectations and management oversight to ensure accountability for timely performance of protection system maintenance and testing work.
- 2) Create quality controls to track the status of system protection maintenance and protection completion, including issuance of reports to senior management on current status of maintenance and testing work.
- 3) Implement a formal process to correct SAP work management database inaccuracies and update records for all transmission protection systems on a recurring basis to ensure that all maintenance intervals are correctly input and data quality is maintained.

[Provide your response here; additional detailed information may be provided as an attachment as necessary]

**Check this box ☐ and proceed to Section E of this form if this Mitigation Plan, as set forth in Part D.1, has already been completed; otherwise respond to Part D.2, D.3 and, optionally, Part D.4, below.**

#### **Mitigation Plan Timeline and Milestones**

D.2 Provide the timetable for completion of the Mitigation Plan, including the completion date by which the Mitigation Plan will be fully implemented and the alleged or confirmed violations associated with this Mitigation Plan corrected:

D.3 Enter Milestone Activities, with completion dates, that your organization is proposing for this Mitigation Plan:

Milestone Activity	Proposed Completion Date* (milestones cannot be more than 3 months apart)
Management Expectation Communication Issued	8/1/2009
Process Quality Controls	11/1/2009
Correct Data Inaccuracies	11/1/2009
All maintenance tasks up to date.	11/1/2009

(\*) Note: Implementation milestones should be no more than three (3) months apart for Mitigation Plans with expected completion dates more than three (3) months from the date of submission. As set forth in CMEP section 6.6, adverse consequences could result from failure to complete, on a timely basis, all required actions in this Mitigation Plan, including implementation of milestones. A request for an extension of the completion date of any milestone or of the Mitigation Plan must be received by WECC at least five (5) business days before the relevant milestone or completion date.



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[Note: Provide your response here; additional detailed information may be provided as an attachment as necessary]

**Additional Relevant Information (Optional)**

- D.4 If you have any relevant additional information that you wish to include regarding the Mitigation Plan, milestones, milestones dates and completion date proposed above you may include it here:

[Provide your response here; additional detailed information may be provided as an attachment as necessary]



## **Section E: Interim and Future Reliability Risk**

**Check this box ☐ and proceed and respond to Part E.2, below, if this Mitigation Plan, as set forth in Part D.1, has already been completed.**

### **Abatement of Interim BPS Reliability Risk**

- E.1 While your organization is implementing the Mitigation Plan proposed in Part D of this form, the reliability of the Bulk Power System may remain at higher risk or be otherwise negatively impacted until the plan is successfully completed. To the extent they are known, reasonably suspected or anticipated: (i) identify any such risks or impacts; and (ii) discuss any actions that your organization is planning to take or is proposing as part of the Mitigation Plan to mitigate any increased risk to the reliability of the bulk power system while the Mitigation Plan is being implemented:

There is minimal interim risk to the BPS. The maintenance tasks that were completed late were outside the prescribed interval from two days to several months late on four year and eight year maintenance intervals. The scope of the mitigation plan is to verify that work processes and oversight have been implemented to ensure that protection system maintenance and testing is performed within prescribed maintenance intervals in accordance with established PG&E standards and procedures.

[Provide your response here; additional detailed information may be provided as an attachment as necessary]

### **Prevention of Future BPS Reliability Risk**

- E.2 Describe how successful completion of the Mitigation Plan as laid out in Part D of this form has or will prevent or minimize the probability that your organization will incur further violations of the same or similar reliability standards requirements in the future:

Implementing adequate controls and improving oversight and accountability will ensure that protection system maintenance and testing will be performed within the required maintenance intervals.  
[Provide your response here; additional detailed information may be provided as an attachment as necessary]



- E.3 Your organization may be taking or planning other action, beyond that listed in the Mitigation Plan, as proposed in Part D.1, to prevent or minimize the probability of incurring further violations of the same or similar standards requirements listed in Part C.2, or of other reliability standards. If so, identify and describe any such action, including milestones and completion dates:

[Provide your response here; additional detailed information may be provided as an attachment as necessary]



## Section F: Authorization

An authorized individual must sign and date this Mitigation Plan Submittal Form. By doing so, this individual, on behalf of your organization:

- a) Submits the Mitigation Plan, as laid out in Section D of this form, to WECC for acceptance by WECC and approval by NERC, and
- b) If applicable, certifies that the Mitigation Plan, as laid out in Section D of this form, was completed (i) as laid out in Section D of this form and (ii) on or before the date provided as the 'Date of Completion of the Mitigation Plan' on this form, and
- c) Acknowledges:
  1. I am Senior of Pacific Gas and Electric Company.
  2. I am an officer, employee, attorney or other person authorized to sign this Mitigation Plan on behalf of Pacific Gas and Electric Company.
  3. I understand Pacific Gas and Electric Company's obligations to comply with Mitigation Plan requirements and WECC or ERO remedial action directives and I have reviewed the WECC and ERO documents related to these obligations, including, but not limited to, the WECC CMEP and the NERC Rules of Procedure.
  4. I have read and am familiar with the contents of the foregoing Mitigation Plan.
  5. Pacific Gas and Electric Company agrees to be bound by, and comply with, the Mitigation Plan, including the timetable completion date, as approved by WECC and approved by NERC.

Authorized Signature: \_\_\_\_\_

(Electronic signatures are acceptable; see CMEP Section 3.0)

Name (Print): Edward A. Salas

Title: Senior Vice President

Date: June 22, 2009



### **Section G: Comments and Additional Information**

You may use this area to provide comments or any additional relevant information not previously addressed in this form.

[Provide your response here; additional detailed information may be provided as an attachment as necessary]

### **Section H: WECC Contact and Instructions for Submission**

Please direct any questions regarding completion of this form to:

Mike Wells, Sr. Compliance Engineer

Email: [mike@wecc.biz](mailto:mike@wecc.biz)

Phone: (801) 883-6884

For guidance on submitting this form, please refer to the "*WECC Compliance Data Submittal Policy*". This policy can be found on the Compliance Manuals website as Manual 2.12:

<http://compliance.wecc.biz/Application/Documents/Forms/WECC%20Compliance%20Data%20Submittal%20Policy.pdf>



## **Attachment A – Compliance Notices & Mitigation Plan Requirements**

- I. Section 6.2 of the WECC CMEP sets forth the information that must be included in a Mitigation Plan. The Mitigation Plan must include:
  - (1) The Registered Entity's point of contact for the Mitigation Plan, who shall be a person (i) responsible for filing the Mitigation Plan, (ii) technically knowledgeable regarding the Mitigation Plan, and (iii) authorized and competent to respond to questions regarding the status of the Mitigation Plan. This person may be the Registered Entity's point of contact described in Section 2.0.
  - (2) The Alleged or Confirmed Violation(s) of Reliability Standard(s) the Mitigation Plan will correct.
  - (3) The cause of the Alleged or Confirmed Violation(s).
  - (4) The Registered Entity's action plan to correct the Alleged or Confirmed Violation(s).
  - (5) The Registered Entity's action plan to prevent recurrence of the Alleged or Confirmed violation(s).
  - (6) The anticipated impact of the Mitigation Plan on the bulk power system reliability and an action plan to mitigate any increased risk to the reliability of the bulk power-system while the Mitigation Plan is being implemented.
  - (7) A timetable for completion of the Mitigation Plan including the completion date by which the Mitigation Plan will be fully implemented and the Alleged or Confirmed Violation(s) corrected.
  - (8) Implementation milestones no more than three (3) months apart for Mitigation Plans with expected completion dates more than three (3) months from the date of submission.
  - (9) Any other information deemed necessary or appropriate.
  - (10) The Mitigation Plan shall be signed by an officer, employee, attorney or other authorized representative of the Registered Entity, which if applicable, shall be the person that signed the Self-Certification or Self Reporting submittals.
- II. This submittal form may be used to provide a required Mitigation Plan for review and approval by WECC and NERC.





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- III. The Mitigation Plan shall be submitted to the WECC and NERC as confidential information in accordance with Section 9.3 of the WECC CMEP and Section 1500 of the NERC Rules of Procedure.
- IV. This Mitigation Plan form may be used to address one or more related Alleged or Confirmed Violations of one Reliability Standard. A separate Mitigation Plan is required to address violations with respect to each additional Reliability Standard, as applicable.
- V. If the Mitigation Plan is approved by WECC and NERC, a copy of the Mitigation Plan will be provided to the Federal Energy Regulatory Commission in accordance with applicable Commission rules, regulations and orders.
- VI. Either WECC or NERC may reject a Mitigation Plan that it determines to be incomplete or inadequate. If the Mitigation Plan is rejected by either WECC or NERC, the Registered Entity will be notified and required to submit a revised Mitigation Plan.
- VII. In accordance with Section 7.0 of the WECC CMEP, remedial action directives also may be issued as necessary to ensure reliability of the bulk power system.

## **Attachment f**

### **PG&E's Certification of Completion for PRC- 005-1 R2.1 dated November 2, 2009**



**Non-Public and CONFIDENTIAL**

## **Certification of Mitigation Plan Completion Form**

Submittal of a Certification of Mitigation Plan Completion shall include data or information sufficient for Western Electricity Coordinating Council (WECC) to verify completion of the Mitigation Plan. WECC may request additional data or information and conduct follow-up assessments, on-site or other Spot Checking, or Compliance Audits as it deems necessary to verify that all required actions in the Mitigation Plan have been completed and the Registered Entity is in compliance with the subject Reliability Standard. (CMEP Section 6.6)

**Registered Entity: Pacific Gas and Electric Company**

**NERC Registry ID: NCR005299**

**Date of Submittal of Certification: November 2, 2009**

**NERC Violation ID No(s) (if known): WECC200901422**

**Standard: PRC-005-1**

**Requirement(s): 2.1**

**Date Mitigation Plan was scheduled to be completed per accepted Mitigation Plan:  
November 1, 2009**

**Date Mitigation Plan was actually completed: November 1, 2009**

**Additional Comments (or List of Documents Attached): 1. Communication Tailboard and Training Records; 2. Program Controls; 3. Work Management Program Data Quality Improvements; 4. Protective System Maintenance Record.**

I certify that the Mitigation Plan for the above named violation has been completed on the date shown above and that all submitted information is complete and correct to the best of my knowledge.

**Name: Edward A. Salas**

**Title: Senior Vice President, Engineering and Operations**

**Email: easw@pge.com**

**Phone: 415-973-2020**

**Authorized Signature: Edward A. Salas**

**Date: 11/2/2009**

## **Attachment g**

### **WECC's Verification of Completion of the Mitigation Plan for PRC-005-1 R2.1 dated November 18, 2009**

**CONFIDENTIAL**



Laura Scholl  
Managing Director - Compliance

(801) 819-7619  
Lscholl@wecc.biz

VIA COMPLIANCE WEB PORTAL

November 18, 2009

John Hagen  
Manager, NERC Compliance  
Pacific Gas and Electric Company  
77 Beale Street; Mail Code B23H  
San Francisco, California 94105

NERC Registration ID: NCR05299

Subject: Certification of Completion Response Letter

Dear John,

The Western Electricity Coordinating Council (WECC) received the Certification of Completion and supporting evidence of Pacific Gas and Electric Company (PG&E) on 11/2/2009 for the alleged violation of Reliability Standard PRC-005-1 Requirement 2.1.

WECC has accepted the Certification of Completion for Requirement 2.1 of the Reliability Standard PRC-005-1 and has found this requirement to be fully mitigated. No further mitigation of this requirement will be required at this time.

If you have any questions or concerns, please contact Phil O'Donnell at podonnell@wecc.biz. Thank you for your assistance in this effort.

Sincerely,



Laura Scholl  
Managing Director of Compliance

LS:rh

cc: Joyce Pefferman, PG&E Manager, Quality Assurance  
Lisa Milanese, WECC Manager of Compliance Program Administration  
Phil O'Donnell, WECC Senior Compliance Engineer

**Attachment h**

**Notice of Filing**

UNITED STATES OF AMERICA  
FEDERAL ENERGY REGULATORY COMMISSION

Pacific Gas and Electric Company

Docket No. NP10-\_\_\_\_-000

NOTICE OF FILING  
April 28, 2010

Take notice that on April 28, 2010, the North American Electric Reliability Corporation (NERC) filed a Notice of Penalty regarding Pacific Gas and Electric Company in the Western Electricity Coordinating Council region.

Any person desiring to intervene or to protest this filing must file in accordance with Rules 211 and 214 of the Commission's Rules of Practice and Procedure (18 CFR 385.211, 385.214). Protests will be considered by the Commission in determining the appropriate action to be taken, but will not serve to make protestants parties to the proceeding. Any person wishing to become a party must file a notice of intervention or motion to intervene, as appropriate. Such notices, motions, or protests must be filed on or before the comment date. On or before the comment date, it is not necessary to serve motions to intervene or protests on persons other than the Applicant.

The Commission encourages electronic submission of protests and interventions in lieu of paper using the "eFiling" link at <http://www.ferc.gov>. Persons unable to file electronically should submit an original and 14 copies of the protest or intervention to the Federal Energy Regulatory Commission, 888 First Street, N.E., Washington, D.C. 20426.

This filing is accessible on-line at <http://www.ferc.gov>, using the "eLibrary" link and is available for review in the Commission's Public Reference Room in Washington, D.C. There is an "eSubscription" link on the web site that enables subscribers to receive email notification when a document is added to a subscribed docket(s). For assistance with any FERC Online service, please email [FERCOnlineSupport@ferc.gov](mailto:FERCOnlineSupport@ferc.gov), or call (866) 208-3676 (toll free). For TTY, call (202) 502-8659.

Comment Date: [BLANK]

Kimberly D. Bose,  
Secretary