

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

Order Instituting Rulemaking to Revise )  
and Clarify Commission Regulations ) R.08-11-005  
Relating to the Safety of Electric Utility ) (Filed November 6, 2008)  
and Communications Infrastructure )  
Provider Facilities. )  
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**COMMENTS OF THE  
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION**

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Dated: June 30, 2011

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Pursuant to Rule 14.3 of the California Public Utilities Commission Rules of Practice and Procedure, the California Independent System Operator Corporation (“ISO”) submits these comments on the Phase 2 proposed decision of Commissioner Simon adopting regulations to reduce fire hazards associated with overhead power lines and aerial communication facilities located in close proximity to power lines (“Proposed Decision”). The ISO’s participation in Phase 2 was limited to proposed changes to General Order (“GO”) 165 that would extend the applicability of GO 165 to electric transmission facilities.<sup>1</sup> As discussed below, the ISO does not object to the revisions to GO 165 that would be adopted in the Proposed Decision.<sup>2</sup>

During this proceeding, the ISO filed comments and participated in workshops to explain the ISO’s role with respect to the inspection and maintenance of electric transmission facilities under its operational control.<sup>3</sup> The ISO described its inspection and maintenance program that includes performance standards to ensure high quality, safe, and reliable electric service. The

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<sup>1</sup> Currently, GO 165 “establish[es] minimum requirements for electric *distribution* facilities, regarding inspection . . . , condition rating, scheduling and perfo[rm]ance of corrective action, record-keeping, and reporting, in order to ensure safe and high-quality electrical service, and to implement the provisions of Section 364 of Assembly Bill 1890, Chapter 854, Statutes of 1996.” (emphasis added).

<sup>2</sup> Accordingly, the ISO is not recommending any changes to the Proposed Decision.

<sup>3</sup> California Public Utilities Code § 348 requires the ISO to “adopt inspection, maintenance, repair, and replacement standards for the transmission facilities under its control.” Section 348 also directs the ISO to “require each transmission facility owner or operator to report annually on its compliance with the standards.”

standards adopted by the ISO are set forth in Appendix C of the Transmission Control Agreement that is part of the ISO's tariff, which is subject to the jurisdiction of the Federal Energy Regulatory Commission.

The Proposed Decision would modify GO 165 to require utilities to "prepare and follow procedures for conducting inspections and maintenance activities for transmission lines" and "maintain records of inspection and maintenance activities."<sup>4</sup> These proposed changes, however, do not prescribe specific inspection and maintenance activities. The ISO believes the proposed changes to GO 165 do not conflict with the Transmission Control Agreement or the ISO's currently adopted inspection and maintenance standards that govern electric transmission facilities under the ISO's operational control. For these reasons, the ISO does not object to the revisions to GO 165 adopted in the Proposed Decision.

Respectfully submitted,

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<sup>4</sup> See Proposed Decision, Appendix A at A-14; Appendix B at B-22.