DOCKETED	
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Project Title:	2017 Incident Reporting for Power Plant Compliance
TN #:	222541
<b>Document Title:</b>	Roseville Electric Utility Comments on Compliance Incident Reporting Policy
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Comment Received From: Roseville Electric Utility

Submitted On: 2/13/2018 Docket Number: 17-SIT-01

## **Comments of Roseville Electric**

Additional submitted attachment is included below.



## **Roseville Electric Utility**

2090 Hilltop Circle
Roseville, California 95747-9704
Reliable Energy. Dependable Service.

February 13, 2018

Christine Root, Compliance Office Manager Siting, Transmission & Environmental Protection Division California Energy Commission Dockets Unit, MS-4 Docket No. 17-SIT-1 1516 Ninth Street Sacramento, CA 95814-5512

RE: <u>17-SIT-1 Compliance Incident Reporting Policy: Comments of Roseville Electric</u>

Dear Ms. Root:

The City of Roseville Electric Department ("Roseville Electric") submits the following comments on the Compliance Incident Reporting procedures that were proposed on November 14, 2017 and discussions relating to these procedures made at the January 25, 2018 workshop.

At the January 25<sup>th</sup> workshop, Commission Staff confirmed that the Compliance Incident Reporting procedures are completely voluntary, and do not constitute a new condition of certification for licensed facilities. Roseville Electric appreciates this confirmation, but is concerned that a project owner who voluntarily reports may be also expected to comply with the extensive reporting requirements, even if such reporting is not warranted by the type of event. As written, the Compliance Incident Reporting procedures cover a broad scope of potential incidents and requests the same level of extensive and detailed reporting for all types of incidents. The Compliance Incident Reporting procedures should be revised to (1) narrow the scope of incidents that would fall under these procedures and (2) provide flexibility in how incidents are reported.<sup>1</sup>

If you have any questions regarding the proposed modification, please contact Julie Manfredi at 916-774-5674 or <a href="manfredi@roseville.ca.us">manfredi@roseville.ca.us</a>.

/s/
Julie Manfredi
Electric Compliance Analyst
Roseville Electric

<sup>&</sup>lt;sup>1</sup> For example, rather than drafting detailed monthly reports, a project owner can refer the Energy Commission to documents or reports made to other agencies for the same incident.