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STATEMENT OF STAFF APPROVAL OF POST CERTIFICATION CHANGE TRACY COMBINED CYCLE POWER PLANT (08-AFC-07C)

On August 30, 2024, the MRP San Joaquin Energy, LLC, filed a Post-Certification Petition for Changes in Project Design, Operation or Performance and Amendments to the Commission Decision (Petition) (TN#[258744](#)) with the California Energy Commission (CEC) for the Tracy Combined Cycle Power Plant (TCCPP) pursuant to California Code of Regulations, title 20, section 1769.

The TCCPP is a 330-megawatt (MW) combined-cycle, natural gas facility that was certified by the CEC in March 2010 and began commercial operation in November 2012. The facility is located in the City of Tracy, San Joaquin County.

DESCRIPTION OF PROPOSED CHANGE

The project owner seeks the CEC's approval of the following project modifications:

1. Establishment of electrical interconnection to the nearby Pacific Gas & Electric Company (PG&E) Schulte Substation at 115 kV via a new line from the Generator Step-up Transformer (GSU) of the future Long-Duration Energy Storage (LDES) project that is not jurisdictional to the CEC. This interconnection requires installation of approximately 350 feet of 115 kV cable between the LDES project and the proposed line tap structure,
2. Construction of a 0.02-acre line tap structure, which would house electrical equipment including switches to combine the LDES project's 115 kV gen-tie line with the existing TCCPP 115 kV gen-tie line. The proposed line tap structure would be located adjacent to and outside of the southwest corner of the PG&E Schulte Substation; and
3. Construction of a dedicated fire water supply connection to the TCCPP raw water supply via a new 430-foot-long, 6-inch diameter, PVC pipeline.

For additional information, go to the [CEC's project webpage](#) (<https://www.energy.ca.gov/powerplant/combined-cycle/tracy-combined-cycle->

[power-plant](#)). In the box labeled "Compliance Proceeding" click on "Docket Log" to access documents for this proceeding.

CEC STAFF REVIEW AND CONCLUSIONS

California Code of Regulations, title 20, section 1769(a)(1) requires a project owner to petition the CEC for the approval of any change the project owner proposes to the project design, operation, or performance requirements of a certified facility. Pursuant to 1769(a)(3)(A), the petition may be approved by CEC staff (staff) only if the following criteria are met:

- i. There is no possibility that the change may have a significant impact on the environment, or the change is exempt from the California Environmental Quality Act;
- ii. The changes would not cause the project to fail to comply with any applicable laws, ordinances, regulations, or standards (LORS); and
- iii. The changes would not require a change to, or deletion of, a condition of certification adopted by the Commission in the Final Decision or subsequent amendments.

Staff reviewed the petition for potential environmental effects and consistency with LORS. Staff's conclusions for all technical and environmental areas are summarized in **Table 1**.

TABLE 1
Summary of Conclusions for all Technical and Environmental Areas

Technical Areas Reviewed	CEQA				Conforms with applicable LORS
	Potentially Significant Impact	Less Than Significant Impact with Mitigation (with Revised or New COCs)	Less Than Significant Impact (with or without Existing COCs)	No Impact	
Air Quality			X		X
Biological Resources			X		X
Cultural Resources			X		X
Efficiency				X	
Facility Design					X
Geological and Paleontological Resources			X		X
Hazardous Materials Management			X		X
Land Use				X	X
Noise and Vibration			X		X
Public Health			X		X
Reliability					
Socioeconomics			X		
Soil and Water Resources			X		X
Traffic and Transportation			X		X
Transmission Line Safety and Nuisance			X		X
Transmission System Engineering					X
Visual Resources			X		X
Waste Management			X		X
Worker Safety and Fire Protection			X		X

Areas shown in gray are not subject to CEQA consideration or have no applicable LORS the project must comply with.

Staff has determined that the modified project would continue to comply with applicable LORS, and the project change would not result in any significant adverse environmental impacts. The basis for each of staff's conclusions are provided below:

AIR QUALITY

The proposed project modifications introduce no emissions during operation, thus requiring no modifications to the existing emissions limits, and do not necessitate air quality permits from the San Joaquin Valley Air Pollution Control District (SJVAPCD). Construction activities, expected to last 6-8 weeks, would produce minor emissions from equipment and vehicle travel, along with minimal dust from foundation drilling and trenching. These emissions would be mitigated by using Tier 4 engines where possible and adhering to SJVAPCD dust control regulations. Given these limited construction-phase emissions and continued compliance with existing air quality Conditions of Certification (COC) **AQ-SC1** through **AQ-SC5**, no significant adverse impacts on air quality or greenhouse gas emissions are anticipated. The project would remain in compliance with all applicable air quality LORS.

BIOLOGICAL RESOURCES

The proposed modifications would take place within previously disturbed areas. Implementation of the existing Conditions of Certification **BIO-1** (Designated Biologist Selection) and **BIO-6** (Biological Resources Monitoring and Implementation Plan) would ensure that nesting birds are monitored, and impacts avoided. The Condition of Condition **BIO-7** (Impact Avoidance Mitigation Measures), item No. 2, would ensure that the 115-kV pole construction conforms to the industry standards to avoid raptor electrocutions. The TCCPP's current biological resources Conditions of Certification **BIO 1-4** and **6-10** would reduce impacts to a less than significant. The proposed project modifications would conform to all applicable LORS.

CULTURAL RESOURCES

Any foreseeable impacts on cultural or tribal cultural resources resulting from the proposed interconnection between the Long Duration Energy Storage (LDES) system, existing PG&E substation, and raw water system would not result in or would be reduced to a less-than-significant level by the implementation of the TCCPP's current COCs. The proposed electrical interconnection would require excavation of two or three tubular steel pole foundations up to 4 feet in diameter and set at 15 feet below the ground surface. Any underground portions of the interconnection would place a conduit about 4 feet below ground surface for a maximum of 450 linear feet. The 0.02-acre interconnect at the PG&E substation would require excavation of soil previously disturbed by agriculture. The raw water supply line within the TCCPP would require

excavation of up to 430 linear feet. Previous episodes of ground disturbance associated with construction of the TCCPP and agricultural production affected the top 3 feet of soil in the proposed work areas. The proposed electrical interconnection and raw water pipeline would therefore require excavation into undisturbed soils, where intact archaeological materials may reside. Conditions of Certification **CUL-1** through **CUL-7** form a comprehensive program for identifying and mitigating any inadvertent archaeological or human remains discoveries during construction (PTA 2024, pages 4 and 6–8). Implementation of Conditions of Certification **CUL-1** through **CUL-7** would reduce such impacts to a less-than-significant level. The proposed project modifications conform to applicable LORS for cultural resources.

EFFICIENCY

The installation of the interconnection between the Long Duration Energy Storage (LDES) system and the existing PG&E substation, along with the installation of a water supply pipeline connecting the existing raw water tank to the fire water tank, would not affect the power plant's thermal efficiency because no power plant generating equipment would be affected. No LORS apply to power plant efficiency.

FACILITY DESIGN

The installation of the 115 kV interconnection between the LDES system and the existing PG&E substation, along with the installation of a water supply pipeline connecting the existing raw water tank to the fire water tank at the TCCPP, must comply with the edition of the California Building Code in effect at the time initial design plans are submitted to the CEC's delegate chief building official (DCBO) for review and approval. Implementation of the existing Facility Design COCs adopted in the Decision and construction compliance oversight by the Delegate Chief Building Official (DCBO) would ensure compliance with all applicable LORS.

GEOLOGICAL AND PALEONTOLOGICAL RESOURCES

The proposed electrical interconnection and raw water pipeline would require excavation into undisturbed soils, where intact paleontological materials may reside. With implementation of existing mitigation measures in Conditions of Certification **PAL-1** through **PAL-8**, as well as **GEN-5**, the proposed project modifications would have a less than significant impact on potential geological and paleontological resources. The CEC staff note that Conditions of Certification **PAL-1** through **PAL-8** were approved in 2010 and follow Society for Vertebrate Paleontology (SVP) (1995) guidelines. The CEC staff interprets that, while more recent SVP guidelines exist (SVP 2010), compliance with the existing Conditions of Certification **PAL-1** through **PAL-8** would mitigate potential impacts to geological and paleontological resources. The proposed

modifications would therefore have less than significant impacts and would comply with applicable LORS.

HAZARDOUS MATERIALS MANAGEMENT

The proposed modifications to construct and operate the 115 kV interconnection to the PG&E Shulte Substation, along with the fire water supply pipeline connection to the TCCPP raw water supply system to accommodate the Tracy LDES Project, would not involve extremely hazardous materials during construction and operation. Hazardous materials such as gasoline, solvents, lubricants, paints, and welding gases would be used in minimal quantities during the construction phase. Hazardous materials in transit would comply with the extensive regulatory framework that applies to the shipment of hazardous materials on California highways and roads to ensure safe handling in general transportation. Hazardous materials would be stored, handled, and used in accordance with applicable LORS. When not in use, any hazardous materials would be stored in designated construction areas in compliance with LORS. Compliance with applicable LORS would ensure that impacts related to hazardous materials management would be less than significant. Therefore, impacts from the proposed modifications to the offsite public or the environment would be less than significant.

LAND USE

The proposed modifications would not physically divide the established community or cause a significant environmental impact due to a conflict with LORS adopted for the purpose of avoiding or mitigating an environmental effect. Further, the modifications would not result in the conversion of farmland or forest land or conflict with agricultural operations. Therefore, the project would have less than significant impacts on land use and would comply with applicable LORS.

NOISE AND VIBRATION

The modification proposed in this petition to amend (PTA) would not cause TCCPP's existing operational noise levels to increase at the nearby residences. Furthermore, the project would continue to meet operational noise requirements established in the Decision. Any noise generated during the installation of the 115 kV interconnection and installation of a water supply pipeline within the TCCPP project boundaries would be temporary, intermittent, and consistent with the local county code (San Joaquin County Code [Section 9-1025.9]) as well as the local noise ordinance. With the implementation of the existing noise COCs in the Decision, the modifications proposed in this PTA would create a less than significant noise impact due to TCCPP's construction and operation. The project would remain in compliance with the applicable LORS.

PUBLIC HEALTH

The proposed project modifications introduce no new air emissions during operation, meaning there is no additional health risk related to air quality from project operation. The construction of the proposed modifications would generate minor emissions from equipment and vehicle use. These emissions would be mitigated by implementation of dust control practices and Tier 4 engine usage. Construction would be short-term (6-8 weeks). The proposed modifications do not require changes to the COCs for Public Health. Implementation of Conditions of Certification **AQ-SC1** through **AQ-SC5** would minimize construction impacts to a less than significant level. The project would remain in compliance with all LORS related to public health.

RELIABILITY

The modification proposed in this PTA would not affect the power plant's overall reliability because the LDES would not affect the operation of the TCCPP. There are no LORS associated with the power plant reliability.

SOCIOECONOMICS

The proposed modifications would have less than significant impacts on workforce, population, housing, and public services. The project would continue to comply with applicable LORS.

SOIL AND WATER

The interconnection would entail the installation of 350 feet of 115 kV cable on 50-foot-high poles, or underground if necessary to avoid overhead obstacles. The fire water pipeline would consist of 430 feet of 6-inch diameter PVC pipe installed underground. The LDES depends on construction of these components, which would support California's need for additional renewable electrical energy supply.

Stormwater management practices for construction would be incorporated into the existing stormwater pollution prevention plan (SWPPP) under the Condition of Certification **SOIL & WATER-3**. The 2,000 gallons per day needed over the 6 to 8 weeks of construction and the 30,000 gallons needed for the initial filling of the fire water system tank are minimal compared to the 54.4 acre-feet (or 1.79 million gallons) per year TCCPP's water demand limitations per Condition of Certification **SOIL & WATER-4**. Therefore, the project would have a less than significant impact on soil and water resources and would comply with applicable COCs and LORS.

TRAFFIC AND TRANSPORTATION

The proposed modifications would not conflict with local plans or ordinances addressing circulation, cause a significant increase in Vehicle Miles Traveled (VMT) in the area, and would not result in a substantial increase in hazards or inadequate emergency access. Therefore, potential transportation impacts would be less than significant, and the project would comply with applicable COCs and LORS.

TRANSMISSION LINE SAFETY AND NUISANCE

The applicant would ground the circuits and utilize duct banks for the electrical interconnection, and if necessary, would use underground circuits to minimize the Electric Fields (EF) and Electro Magnetic Fields (EMF) effects. The poles that are utilized to construct overhead line segments will be grounded and built with proper line clearance with the ground to reduce the EF and EMF effects. The applicant will follow the CPUC G.O.95, 128, and 131-D standards in the design and construction process of the 115kV line segment. The proposed modifications would create a less than significant impact due to the construction and operation of the 115 kV line segment interconnection and would comply with all applicable LORS.

TRANSMISSION SYSTEM ENGINEERING

The Tracy long-duration energy storage (Tracy LDES) proposed installation of a 40 MW, 8-hour duration battery energy storage system. The Tracy LDES proposed to tap the existing TCCPP 115 kV generator tie-line that connects the TCCPP switchyard at the PG&E Schulte Substation. The new 115 kV LDES generator tie-line would be built with 336.4 kcmil ACSR overhead conductor approximately 500 feet long.

The TCCPP output would be reduced from 337 MW to 297 MW and the total output of both the LDES and the TCCPP would not exceed the 337 MW at the point of interconnection (POI). The Generator Limiting Scheme would control the total generation delivered to the POI.

A Revised Modification Request Report dated September 19, 2024, was completed by the California Independent System Operator for this Post-Commercial Operation Date Modification for the installation of the LDES. A Second Amended and Restated Large Generator Interconnection Agreement was submitted on June 4, 2025 for this proposed amendment.

Staff concludes that the proposed Tracy LDES, assuming compliance with the existing TSE Conditions of Certification (COCs) would continue to comply with applicable LORs.

VISUAL RESOURCES

The proposed modifications would have a less than significant effect with the implementation of the existing COCs for visual resources. The project would remain in compliance with the applicable LORS

WASTE MANAGEMENT

The proposed modification would likely produce minimal waste typical to wastes generated by similar projects. Continued compliance of the project with existing COCs **WASTE-1, WASTE-2, WASTE-5, and WASTE-6** and would ensure that impacts of the proposed modification on solid waste collection and disposal would be less than significant. The modifications would conform to applicable LORS related to waste management and no changes to the existing COCs would be required.

WORKER SAFETY AND FIRE PROTECTION

The construction of the proposed 115 kV interconnection to the PG&E Shulte Substation, along with the fire water supply pipeline connection to the TCCPP raw water supply system to accommodate the Tracy LDES Project, would have a less than significant impact to Worker Safety and Fire Protection. Compliance with existing COCs **WORKER SAFETY-1** and **WORKER SAFETY-3** would ensure that the proposed project modifications would comply with applicable LORS. Therefore, impacts from the proposed modifications on worker health and safety or the offsite public would be less than significant.

CALENVIRONSCREEN 4.0

Staff reviewed CalEnviroScreen 4.0 data to determine whether the United States census tract where the Tracy Combined-Cycle Power Plant is located (06077005207) is identified as a disadvantaged community. This science-based mapping tool is used by the California Environmental Protection Agency (CalEPA) to identify disadvantaged communities based on geographic, socioeconomic, public health, and environmental hazard criteria pursuant to Health and Safety Code section 39711 as enacted by Senate Bill 535 (De León, Chapter 830, Statutes of 2012). The CalEnviroScreen 4.0 overall percentile score for this census tract is 43.3 and, thus, is not identified as a disadvantaged community¹.

ENVIRONMENTAL JUSTICE

Environmental Justice Figure 1 shows 2020 census blocks in the six-mile radius of the Tracy Combined-Cycle Power Plant with a minority population greater than or equal to 50 percent. The population in these census blocks represents an environmental

STATEMENT OF STAFF APPROVAL OF POST CERTIFICATION CHANGE
TRACY COMBINED CYCLE POWER PLANT (08-AFC-07C)

Page 10

justice (EJ) population based on race and ethnicity as defined in the United States Environmental Protection Agency's *Guidance on Considering Environmental Justice During the Development of Regulatory Actions*. Staff conservatively obtains demographic data within a six-mile radius around a project site based on the parameters for dispersion modeling used in staff's air quality analysis. Air quality impacts are generally the type of project impacts that extend the furthest from a project site. Beyond a six-mile radius, air emissions have either settled out of the air column or mixed with surrounding air to the extent the potential impacts are less than significant. The area of potential impacts would not extend this far from the project site for most other technical areas included in staff's EJ analysis.

Based on California Department of Education data in the **Environmental Justice Table 1**, staff concluded that the percentage of those living in the Mountain House Elementary and Tracy Joint Unified school districts (in a six-mile radius of the project site) and enrolled in the free or reduced price meal program is greater than those in the reference geography. Thus, it is considered an EJ population based on low income as defined in *Guidance on Considering Environmental Justice During the Development of Regulatory Actions*. **Environmental Justice – Figure 2** shows where the boundaries of the school district are in relation to the six-mile radius around the Tracy Combined-Cycle Power Plant site.

Environmental Justice – Table 1

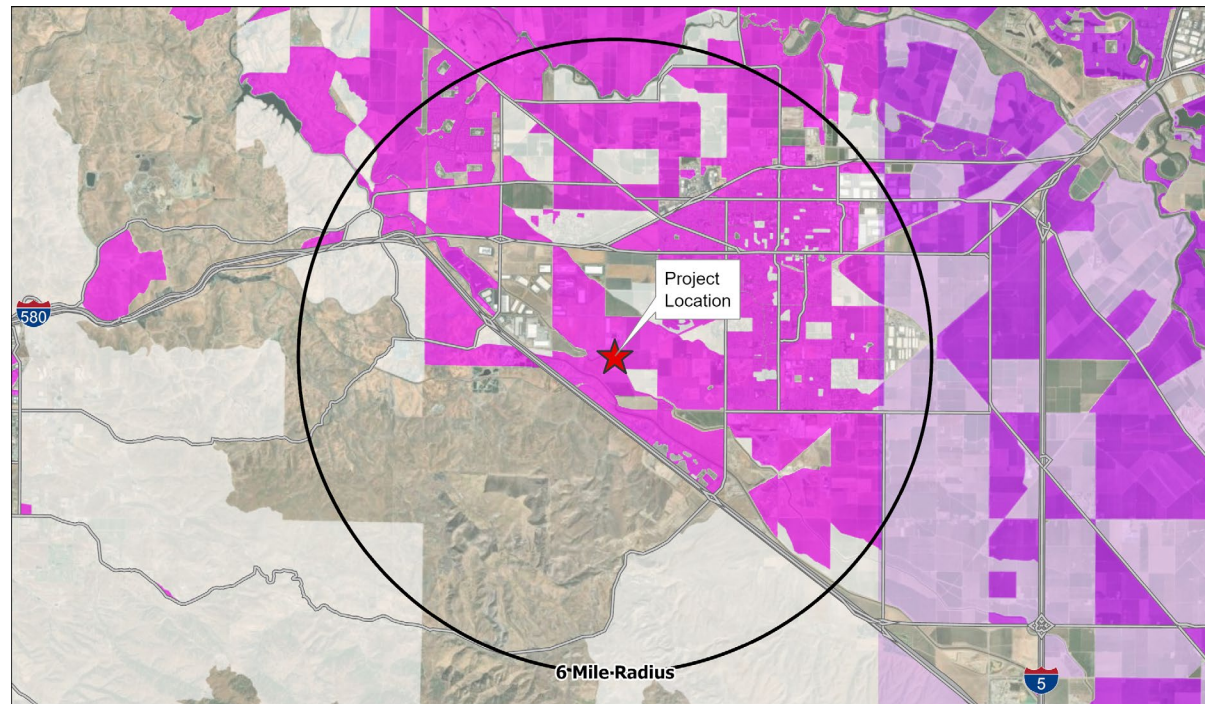
Low Income Data within the Project Area

SAN JOAQUIN COUNTY SCHOOL DISTRICTS IN SIX-MILE RADIUS	Enrollment Used for Meals	Free or Reduced Price Meals	
Lammersville Joint Unified	7,764	855	11.0%
Jefferson Elementary	2,905	925	31.8%
Tracy Joint Unified	15,100	10,525	69.7%
REFERENCE GEOGRAPHY			
San Joaquin County	4,720	3,715	78.7%

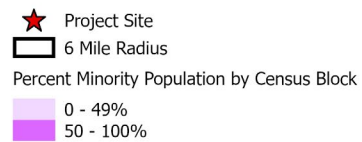
STATEMENT OF STAFF APPROVAL OF POST CERTIFICATION CHANGE
 TRACY COMBINED CYCLE POWER PLANT (08-AFC-07C)
 Page 11

ALAMEDA COUNTY SCHOOL DISTRICTS IN SIX-MILE RADIUS	Enrollment Used for Meals	Free or Reduced Price Meals	
Mountain House Elementary	12	6	50.0%
REFERENCE GEOGRAPHY			
Alameda County	6,399	4,758	74.4%
Source: CDE 2024. California Department of Education, DataQuest, Free or Reduced Price Meals, District level data for the year 2023-2024, http://dq.cde.ca.gov/dataquest/ .			

STATEMENT OF STAFF APPROVAL OF POST CERTIFICATION CHANGE
TRACY COMBINED CYCLE POWER PLANT (08-AFC-07C)
Page 12

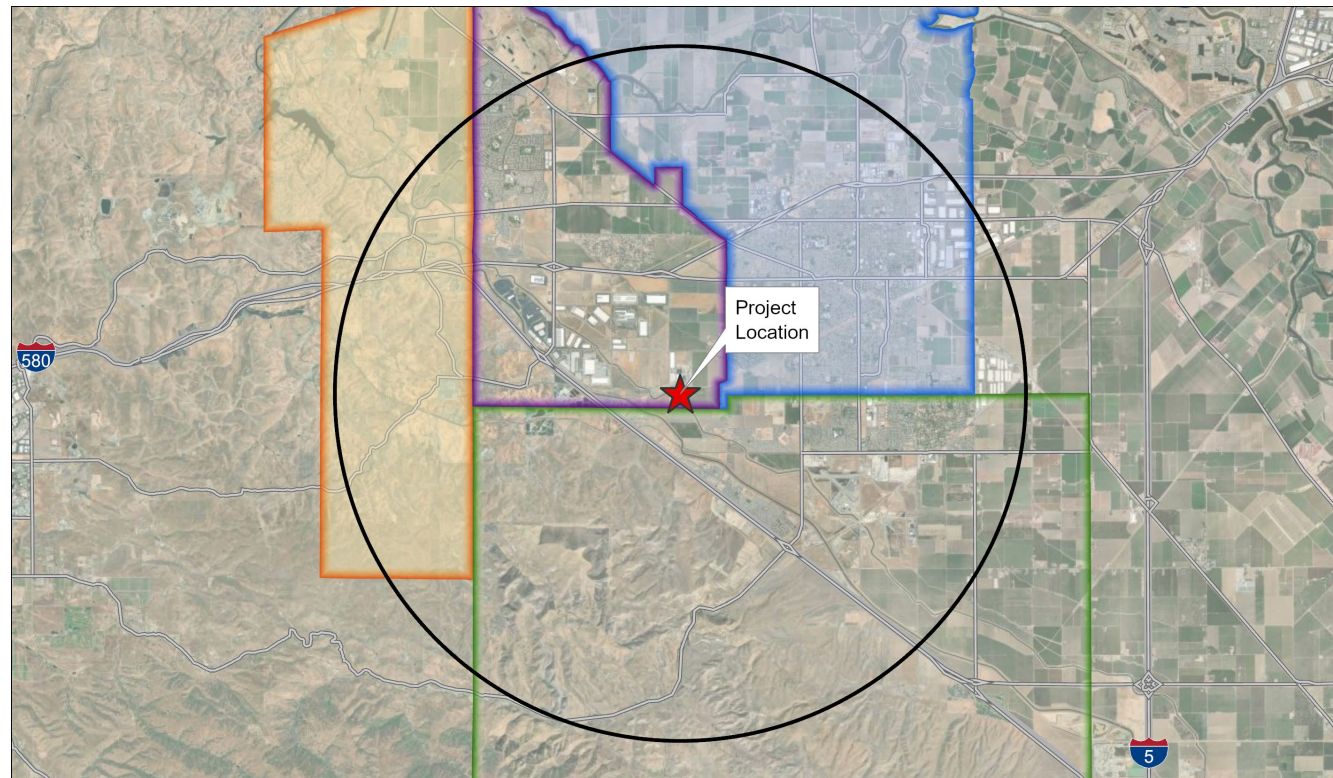


Environmental Justice Figure 1



Sources:
Census 2020 PL 94-171 Data and SB 535
Disadvantaged Communities, 2022

STATEMENT OF STAFF APPROVAL OF POST CERTIFICATION CHANGE
TRACY COMBINED CYCLE POWER PLANT (08-AFC-07C)
Page 13



★ Project Site
6 Mile Radius
0 2 4
Miles

School District
Jefferson Elementary School District
Lammersville Joint Unified School District
Mountain House Elementary School District
Tracy Unified School District

Environmental Justice Figure 2

Note: Shaded areas have an EJ population based on low income
Sources: TIGER Data, CDE 2024

Environmental Justice Conclusions

The following technical areas (if affected) consider impacts to EJ populations: Air Quality, Cultural Resources (indigenous people), Hazardous Materials Management, Land Use, Noise and Vibration, Public Health, Socioeconomics, Soil and Water resources, Traffic and Transportation, Transmission Line Safety and Nuisance, Visual Resources, Waste Management, and Worker Safety and Fire Protection.

For these technical areas, staff concludes that impacts would be less than significant and thus would be less than significant on the EJ population represented in **Environmental Justice Figure 1, Figure 2, and Table 1.**

CEC STAFF DETERMINATION

Staff has determined that the petition meets the criteria for approval by staff, and therefore, submission to the CEC for approval is not required. Specifically, based on the environmental and other analysis set forth above, staff has determined the proposed changes described in the petition meet the following requirements:

1. There is no possibility that the change may have a significant impact on the environment, or the change is exempt from the California Environmental Quality Act;
2. The changes would not cause the project to fail to comply with any applicable laws, ordinances, regulations, or standards;
3. The changes would not require a change to, or deletion of, a condition of certification adopted by the Commission in the final decision or subsequent amendments; and
4. Regarding the changes to the air quality conditions of certification, no daily, quarterly, annual or other emission limit will be increased as a result of the change.

Staff also concludes that none of the findings specified in 1748(b) apply to the proposed changes and the proposed changes do not meet any of the criteria requiring the production of subsequent or supplemental review pursuant to Public Resources Code section 21166 and California Code of Regulations, tit. 20, section 15162.

WRITTEN COMMENTS

This statement of staff summary and approval of the proposed project changes has been filed in the docket for this project. Pursuant to California Code of Regulations, title 20, section 1769(a)(3)(C), any person may file an objection to the CEC staff's

determination within 14 days of the filing of this statement on the grounds that the project change does not meet the criteria set forth in sections 1769(a)(3)(A) or (a)(3)(B). Absent any objections as specified in section 1769(a)(3)(C), this petition will be approved 14 days after this statement is filed.

The [CEC's project webpage](https://www.energy.ca.gov/powerplant/combined-cycle/tracy-combined-cycle-power-plant) (<https://www.energy.ca.gov/powerplant/combined-cycle/tracy-combined-cycle-power-plant>) has a link to the PTA and this Statement of Staff Approval. In the box labeled "Compliance Proceeding," click on the "Docket Log" to access documents for this Proceeding.

Written comments or objections to staff's determination may be submitted using the CEC's e-Commenting feature, as follows: Go to the [CEC's project webpage](https://www.energy.ca.gov/powerplant/combined-cycle/tracy-combined-cycle-power-plant) and click on either the "Comment on this Proceeding," or "[Submit e-Comment](#)" link. When your comments are filed, you will receive an email with a link to them.

Written comments or objections may also be mailed to:

California Energy Commission
Docket Unit, MS-4
Docket No. 08-AFC-07C
715 P Street
Sacramento, CA 95814-5512

All comments and materials filed with the Docket Unit will be added to the facility Docket Log and be publicly accessible on the [CEC's project webpage](https://www.energy.ca.gov/powerplant/combined-cycle/tracy-combined-cycle-power-plant).

If you have questions about this document, please contact Compliance Project Manager Anwar Ali, Compliance Monitoring and Enforcement Unit, Safety and Reliability Branch, at (916) 698-7498, or via email at anwar.ali@energy.ca.gov.

For information on public participation, please contact the CEC's Office of Public Advisor, Energy Equity, and Tribal Affairs at (916) 957-7910 or email at publicadvisor@energy.ca.gov.

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