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Project Title:	Compliance - Watson Cogeneration Company AFC
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Document Title:	PETITION TO AMEND - Modification of the CEC's Jurisdictional Site Boundaries to Exclude Areas of Previous Construction Work
Description:	PETITION TO AMEND - Modification of the CEC's Jurisdictional Site Boundaries to Exclude Areas of Previous Construction Work.
Filer:	Anwar Ali
Organization:	California Energy Commission
Submitter Role:	Commission Staff
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Watson Cogeneration Company
22850 South Wilmington Avenue
Carson, CA 90740-6203

October 11, 2024

Mr. Anwar Ali
Compliance Project Manager
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Subject: Watson Cogeneration Project (85-AFC-01C): Petition to Amend

Dear Mr. Ali,

On behalf of the Watson Cogeneration Company ("Project Owner"), attached is a Petition to Amend for the Watson Cogeneration Project. The Project Owner requests Staff approval of the petition because the changes will not affect the Watson Cogeneration Project's ability to comply with applicable laws, ordinances, regulations, or standards and there are no significant environmental impacts from the proposed change. Further, there are no conditions of certification that are affected by the proposed change.

If you have any questions regarding this Petition, please contact me via telephone at 562-560-1193 or via e-mail at JJAmsden@marathonpetroleum.com.

Sincerely,

Jennifer Amsden
Watson Cogeneration Company

Pursuant to Section 1769 of the California Energy Commission's ("CEC") regulations, Watson Cogeneration Company ("Project Owner") submits this petition ("Petition") for CEC Staff approval of changes to the Watson Cogeneration Project ("Watson Cogen").

The changes will not result in any significant environmental impacts or impact the Watson Cogen's ability to comply with all applicable laws, ordinances, regulations, and standards ("LORS"). Further, no conditions of certification are affected by the proposed changes. Therefore, the Project Owner requests that CEC Staff approve the Petition pursuant to Section 1769(a)(3) of the CEC's regulations.

1. SECTION 1769 (A)(1)(A): DESCRIPTION OF THE PROPOSED CHANGE, INCLUDING NEW LANGUAGE FOR ANY CONDITIONS OF CERTIFICATION THAT WILL BE AFFECTED.

The Watson Cogen is wholly located within the Marathon Los Angeles Refinery (the "Refinery") property boundaries. The Project Owner proposes the following changes to the Watson Cogen: (1) revision of the project description to reflect the addition of three new 220-kilovolt (kV) gas-insulated switchgear ("GIS") within the existing Sub 1F substation; and (2) modification of the CEC jurisdictional site boundaries to exclude areas of the site where a new 69 kV GIS substation and 69 kV transformers have been constructed to serve the Refinery because these facilities are not dedicated or essential to the operations of the Watson Cogen.

The Watson Cogen was constructed at the former ARCO Watson Oil Refinery Complex in an area previously occupied by a removed and remediated former oil storage reservoir. Prior to project construction, ARCO back-filled the 30-foot deep, 22-acre reservoir with soils and graded to near existing refinery level. The site for the new transformers and GIS switchgear and relay buildings are located within the existing Watson Cogen site and in areas that were previously paved with asphalt as part of the original construction plans.

(1) Addition of three new 220 kV GIS within the existing Sub 1F substation at the Watson Cogen.

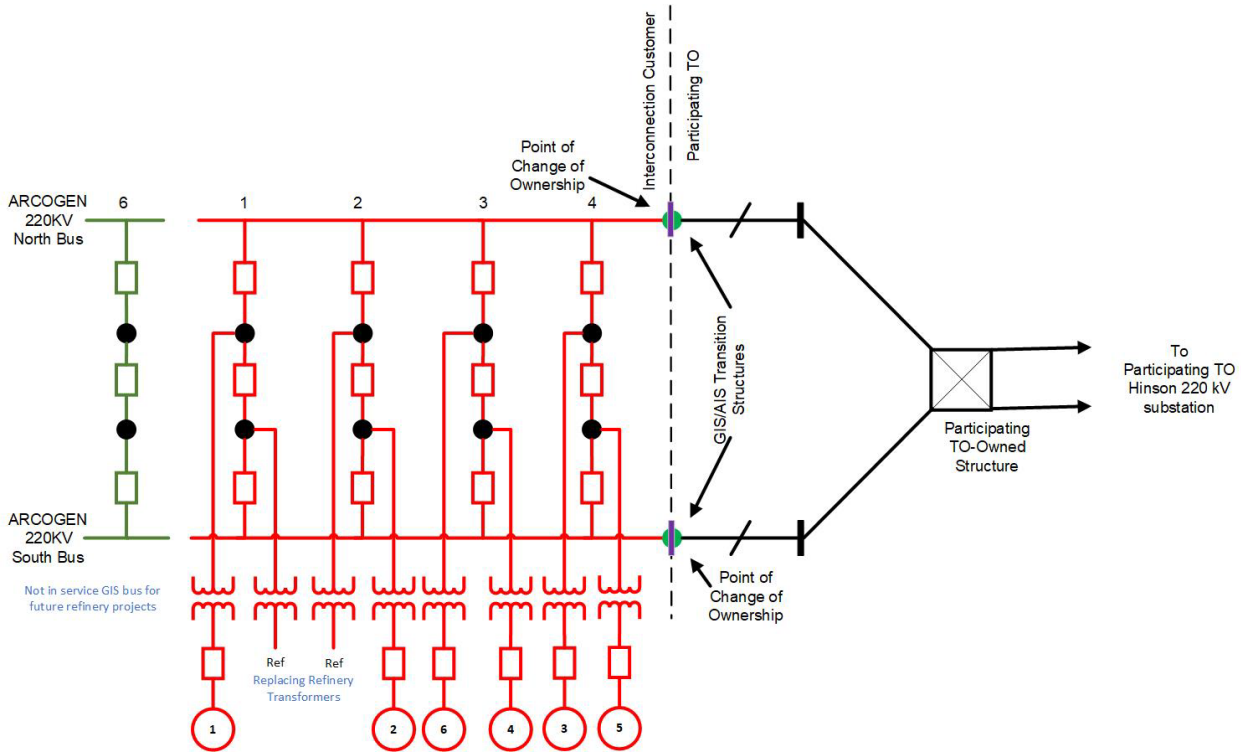
The new GIS are located in the existing Sub 1F substation and laid out in a breaker and a half arrangement. The GIS is the same breaker and a half arrangement that is currently used in the Watson Cogen's design, which will continue to ensure very high reliability and limit short circuit current to the existing electrical equipment to prevent equipment damage and ensure personnel safety. While the GIS were originally planned to connect to the two (2) new 150 MVA 220/69 kV transformers that feed the Refinery complex's 69 kV GIS substation, currently the Project Owner does not intend to commission the three new 220 kV GIS breakers or otherwise interconnect the new 220 kV GIS. The Project Owner seeks to keep open the possibility of the new 220 kV GIS to be commissioned in the future, at which time the Project Owner will confer with CEC Staff regarding consistency with the CEC certification. The work is being conducted to

coincide with related maintenance to minimize possible tripping and is expected to be completed by the third quarter of 2024.

The location of the new 220 kV GIS is within the existing Watson Cogen substation and does not require physical modification of the substation building. Additionally, the construction and installation of the new GIS has been reviewed and approved by the City of Carson, which performed plan check and other chief building official duties.

This proposed change does not require any new language for any conditions of certification and does not affect the design or operation of the Watson Cogen. The new Sub 1F 220 kV GIS are depicted in Figure 1 in spot 6, between the ARCOGEN North and South 220kV bus.

Figure 1: New Sub 1F 220 kV GIS



(2) *Modification of the CEC jurisdictional site boundaries.*

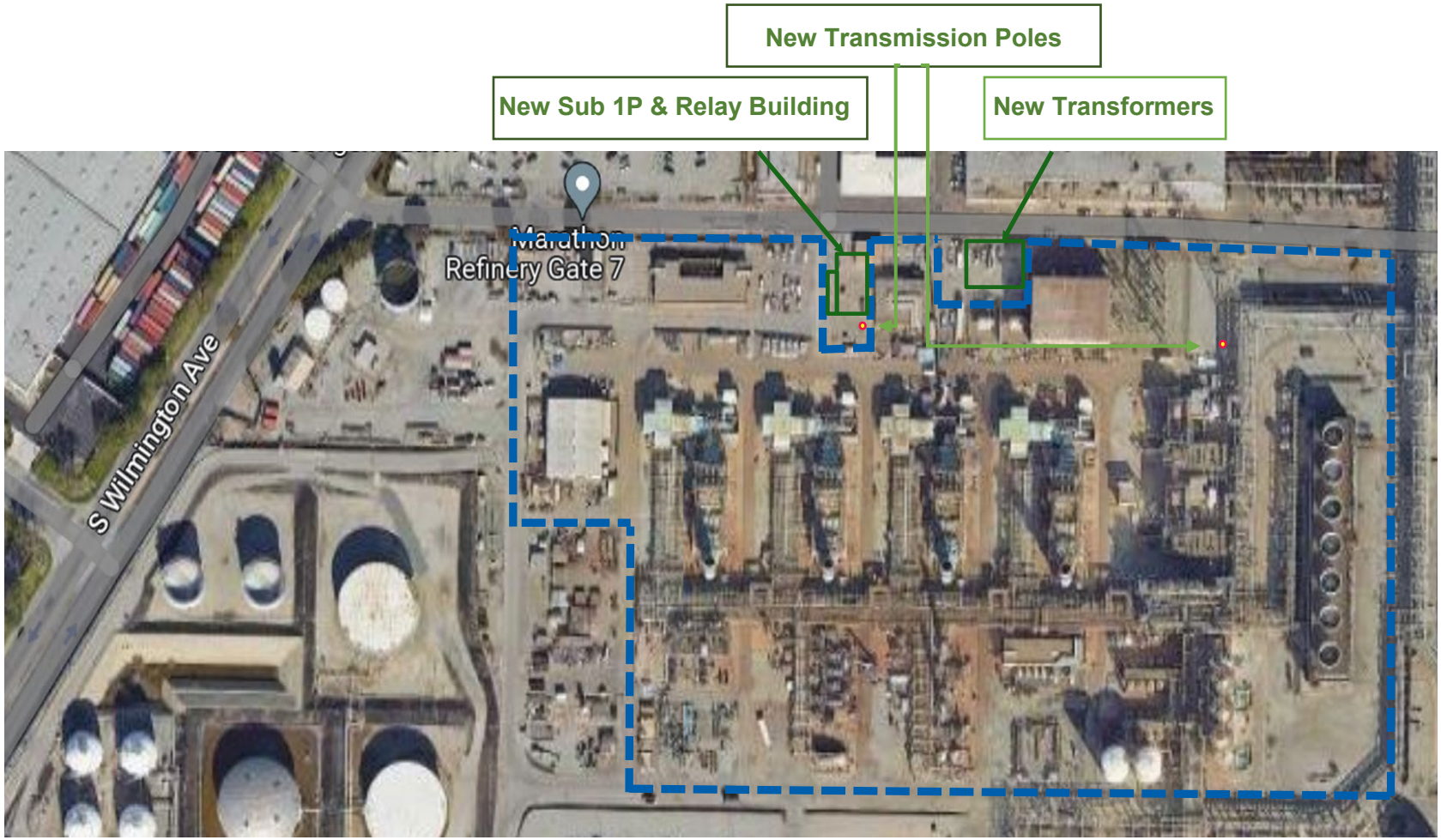
This Petition requests modification of the Watson Cogen CEC jurisdictional site boundaries to exclude areas of the site that do not serve the cogeneration powerplant. In these areas, a new 69 kV GIS substation ("Sub 1P") and 69 kV transformers have been constructed to serve the Refinery and these facilities are not dedicated to or essential to the operations of the Watson Cogen. Permitting and construction of the 69 kV GIS substation and 69 kV transformers was performed under the oversight of the City of Carson, who has acted as the Chief Building Official ("CBO").

Two new transmission poles have also been constructed to deliver electricity from the new substation, Sub 1P, to the Refinery. One of these poles is located directly adjacent to the Sub 1P, and is part of the area to be excluded under this Petition. The other pole is located on the eastern end of the Watson Cogen site boundary. While the new pole would be located within the Watson Cogen site, the pole is not dedicated to or essential to the operations of the Watson Cogen. The poles were also designed and constructed under the oversight of the City of Carson.

Alteration of the site boundaries for the Watson Cogen does not require any new language for any conditions of certification and does not affect the design or operation of the Watson Cogen. Figure 2 depicts current site boundaries, and Figure 3 depicts proposed site boundaries.

Figure 2: Existing Site Boundaries

Figure 3: Proposed Site Boundaries



2. SECTION 1769 (A)(1)(B): DISCUSSION OF THE NECESSITY FOR THE PROPOSED CHANGE AND AN EXPLANATION OF WHY THE CHANGE SHOULD BE PERMITTED.

The changes described herein are necessary and should be permitted as the improvements will help optimize Refinery operations, improve energy recovery, and improve electrical supply reliability.

3. SECTION 1769(A)(1)(C): DESCRIPTION OF ANY NEW INFORMATION OR CHANGE IN CIRCUMSTANCES THAT NECESSITATED THE CHANGE.

While the basic purpose of the powerplant has remained unchanged since the September 1986 certification (supplying steam and power for operations), non-powerplant operations within the Refinery complex have evolved and modernized. The changes described in this Petition are focused on ensuring that the Watson Cogen's outputs will be available in the future if needed to be delivered to the Refinery's internal 69 kV system to serve the Refinery's operations. Additionally, the new transformers and GIS are also functionally replacing old transformers and 69 kV switchgear, which is becoming obsolete. This provides additional capacity to provide energy to the refinery as needed. Under the inspection and oversight of the City of Carson, the integration of the Watson Cogen's steam and electricity have improved Refinery operations to achieve the benefits described above in Section 2. The overall benefit to the Refinery, including improved reliability, is a change in circumstance supporting the proposed changes.

4. SECTION 1769(A)(1)(D): AN ANALYSIS OF THE EFFECTS THAT THE PROPOSED CHANGE MAY HAVE ON THE ENVIRONMENT AND PROPOSED MEASURES TO MITIGATE ANY SIGNIFICANT ENVIRONMENTAL EFFECTS.

Air Quality/Public Health: The changes will not increase emissions from the Watson Cogen above existing permitted levels and will support continued safe, reliable and effective operation. The Watson Cogen will continue to meet all existing emissions limits established in the existing South Coast Air Quality Management District permits. Therefore, the changes will not have a significant adverse impact on air quality.

Biological Resources: The changes will occur within the boundaries of the existing heavy industrial site, which has been fully disturbed, largely paved, and developed for approved industrial uses. There is no native vegetation or wildlife habitat present on the site, and the site is largely devoid of any vegetation or wildlife. Therefore, the changes will not have a significant adverse impact to biological resources.

Cultural Resources: The changes are within the boundaries of an existing heavy industrial site, which has been fully disturbed and developed for industrial uses. The Watson Cogen was constructed at the former ARCO Watson Oil Refinery Complex in an area previously occupied by an oil storage reservoir. Prior to project construction,

ARCO back-filled the 30-foot deep, 22-acre reservoir with soils and graded to near existing refinery level. The new GIS are located within the existing Watson Cogen substation and in areas that were previously paved with asphalt. Similarly, the transmission pole that would remain within the site boundary is within the previously disturbed and developed site. Therefore, the changes will not have a significant adverse impact to cultural resources.

Land Use: The City of Carson's review confirms the changes are consistent with existing heavy industrial uses in the area. The City's trained professionals have inspected the changes, and the Project Owner has received the following building and electrical permits from the City of Carson.

Permit Description	Permit No.	Refinery or Watson Cogen
GIS Building (Sub 1P) and Ancillary Equipment	BL2208100020	Refinery
Pre-fabricated GIS Relay Building	BL2208100019	Refinery
Foundation - 230kV Transformers	BL2209070003	Refinery
230kV GIS Switchgear Addition in Sub 1F	EL2305240012	Watson Cogen (not to be commissioned or interconnected)
230kV Transformers & 69kV GIS Switchgear	EL2305240010	Refinery
69kV GIS Relay Building	EL2301170007	Refinery

Noise: The changes will not result in new or different noise levels from the Watson Cogen above permitted levels.

Visual Resources: The changes will not substantially degrade the existing visual character or quality of the site, or its surroundings. Potential viewers will be Watson Cogen's professionals, employees and approved visitors, who all expect industrial views and features in this setting. The new GIS are located wholly within the existing Sub 1F substation building. As described in Table 1 below, the new transformers will have maximum height of 34 feet and will be surrounded by Watson Cogen structures and refinery structures including tank farms, cooling towers, stacks and structures, some of which are over 200 feet high. The two new transmission poles, which reach 125-135 feet, similarly do not present a substantial adverse change to the existing visual environment.

Table 1: Summary Plan/Elevation Information

Equipment	Elevation above Grade
230 kV/69 kV Transformers	25’
GIS Building (Sub 1P)	34’
Transmission Poles	125-135’

Therefore, the changes will not have a significant adverse visual resources impact.

Waste Management: The changes will not change or affect waste management practices or the types or quantities of waste generated by the Watson Cogen. All waste generated during construction will comply with the facility’s existing Waste Management Plan.

Water Resources: The changes will not change or affect water use from the Watson Cogen.

Worker Safety and Fire Protection: The changes will not modify or increase impacts analyzed by the CEC during certification and do not affect the Commission Decision’s conditions, findings or conclusions regarding worker safety and fire protection.

5. SECTION 1769(A)(1)(E): ANALYSIS OF HOW THE PROPOSED CHANGE WOULD AFFECT THE PROJECT’S COMPLIANCE WITH APPLICABLE LAWS, ORDINANCES, REGULATIONS, AND STANDARDS.

The changes will not impact Watson Cogen’s ability to comply with applicable LORS.

6. SECTION 1769(A)(1)(F): DISCUSSION OF HOW THE PROPOSED CHANGE WOULD AFFECT THE PUBLIC.

The changes are wholly within the existing Refinery complex, which has controlled access limited to authorized personnel and will thus not adversely affect the public. The proposed changes do not result in significant unmitigated impacts to the environment and do not negatively impact air quality or public health.

7. SECTION 1769(A)(1)(G): PROVIDE A LIST OF CURRENT ASSESSOR'S PARCEL NUMBERS AND OWNERS' NAMES AND ADDRESSES FOR ALL PARCELS WITHIN 500 FEET OF ANY AFFECTED PROJECT LINEARS AND 1000 FEET OF THE PROJECT SITE.

Consistent with the public interest in the privacy of the general public, the Project Owner can provide a list of property owners upon request.

8. SECTION 1769(A)(1)(H): DISCUSSION OF THE POTENTIAL EFFECT ON NEARBY PROPERTY OWNERS, RESIDENTS, AND THE PUBLIC.

The changes will not adversely affect the public. The changes do not result in significant unmitigated impacts to the environment and do not negatively impact air quality or public health. Therefore, the changes will have no impact on property owners, residents, or the public.

9. SECTION 1769(A)(1)(I): A DISCUSSION OF ANY EXEMPTIONS FROM THE CALIFORNIA ENVIRONMENTAL QUALITY ACT THAT MAY APPLY TO APPROVAL OF THE PROPOSED CHANGE.

The changes are categorically exempt from the California Environmental Quality Act ("CEQA"). First, the changes are categorically exempt pursuant to Title 14, Section 15301 of the California Code of Regulations as a minor alteration to an existing facility, as they present negligible or no expansion of use of the Watson Cogen. The new GIS were installed within the existing Watson Cogen substation and did not otherwise require alteration of the larger substation building. The two transmission poles are also minor in nature when compared to the structures comprising the Watson Cogen and Refinery. The changes will not expand the existing use of the Watson Cogen, and will enable more efficient and reliable operations.

Second, the changes are categorically exempt pursuant to Title 14, Section 15061(b)(3) of the California Code of Regulations, the "Common Sense Exemption." This exemption provides that "[w]here it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA." (14 C.C.R. § 15061(b)(3).) In this case, the changes are located entirely within an existing, developed industrial site. Emission levels from the Watson Cogen will not increase, and noise levels from the Watson Cogen will remain within existing baseline levels. In short, there would be no substantial adverse changes to existing baseline conditions at the Watson Cogen site from the proposed changes. Therefore, the proposed modifications are categorically exempt from CEQA pursuant to the "Common Sense Exemption."