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Document Title:	Petition for Post-Certification Change Greenleaf 1 Extension
Description:	N/A
Filer:	Samantha G. Neumyer
Organization:	Climate Edge Law Group
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Sutter Energy Center 5029 South Township Road Yuba City, CA 95993

October 16, 2025

John Heiser Compliance Project Manager California Energy Commission 715 P Street Sacramento, CA 95814

RE: <u>Sutter Energy Center (97-AFC-02C): Petition for Post-Certification Change</u> <u>Greenleaf 1 Temporary Power Generators Extension</u>

Dear Mr. Heiser:

Pursuant to Section 1769 of the California Energy Commission's Regulations, CCFC Sutter Energy, LLC ("Project Owner") submits this petition ("Petition") to modify the California Energy Commission's certification of the Sutter Energy Center ("SEC") to include the Green Leaf 1 Temporary Power Generators ("GL1").

The post-certification fee of \$5,000 and the list of affected property owners will be submitted under separate cover. If you have any questions or require more information, please contact Nadira Basdeo at <a href="Madira.Basdeo@calpine.com">Nadira.Basdeo@calpine.com</a>.

Sincerely,

/s/

Barbara McBride Senior Director Origination and Development Calpine Corporation

## Petition for Post-Certification Change Greenleaf 1 Temporary Power Generators Extension

Sutter Energy Center 97-AFC-02C

Submitted to: California Energy Commission

Submitted by: CCFC Sutter Energy, LLC

# SUTTER ENERGY CENTER (97-AFC-02C) Petition for Post-Certification Change: Greenleaf 1 Temporary Power Generators Extension

Pursuant to Section 1769 of the California Energy Commission's regulations, CCFC Sutter Energy, LLC ("Project Owner") submits this petition ("Petition") to modify the Commission's certification of the Sutter Energy Center ("SEC") to include the Green Leaf 1 Temporary Power Generators ("GL1"). As part of this modification, the Project Owner proposes that the site for the SEC be modified accordingly to include GL1.

GL1 is an approximately 60-megawatt (net) natural gas-fired simple-cycle electric generating facility located in Yuba City, California. On September 8, 2021, GL1 was granted a license by the CEC Executive Director pursuant to Governor Newsom's Proclamation of State Emergency issued on July 30, 2021 and the CEC's process to license new generators in accordance with the Governor's Proclamation.

GL1 provided an essential resource able to be deployed during a grid emergency, supporting California's grid reliability needs during extreme heat wave and wildfire events. GL1 currently consists of two TM 2500+G4 gas turbines package units, which were installed in 2021. Following decommissioning and removal of the existing package units, which is anticipated to commence on October 15, 2025, the Project Owner intends to replace the removed units with similar replacement TM2500 units to ensure that the capacity from GL1 remains available to support continued grid reliability needs.

1. Section 1769 (a)(1)(A) and (B): Description of the proposed change, including new language for any affected conditions, the necessity for the change, and why the change should be permitted.

GL1 is located at the site of the decommissioned Green Leaf 1 Cogeneration facility adjacent to SEC. The Project Owner proposes to amend the CEC's certification of SEC to incorporate GL1. Once the existing TM2500 are removed from the GL1 site, the Project Owner will replace the removed units with similar replacement TM2500 units. GL1 will continue to utilize the following existing components: existing 4-inch gas line which is located at the northeast corner of the facility; generating step-up units ("GSU") to interconnect to the existing 115 kilovolt transmission lines; and three-inch water pipeline located west of the SEC. The change should be permitted so that the capacity from GL1 remains available to support grid reliability.

Because the Project Owner plans a like-kind replacement of the existing GL1 TM2500 units that will meet the provisions of the existing CEC certification and the existing Feather River Air Quality Management District ("FRAQMD") Permit to Operate ("PTO") for GL1, the Project Owner proposes that the existing conditions of certification contained in the CEC license and FRAQMD PTO be incorporated into the conditions of certification for SEC.

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2. Section 1769(a)(1)(C): Description of any new information or change in circumstances that necessitated the change.

Because the existing GL1 units are being decommissioned and removed, the Project Owner proposes a like-kind replacement of those units, and incorporation of these units into the CEC's certification of SEC. Because the capacity from GL1 will continue to serve an important role in grid reliability, the Project Owner believes that these changed circumstances necessitate amendment of SEC's license to incorporate GL1. The Project Owner also notes that other circumstances have changed since SEC was first approved, including the decommissioning of the Greenleaf 1 cogeneration facility and the decrease in agricultural uses surrounding the SEC site.

3. Section 1769(a)(1)(D): Analysis of the effects that the proposed change may have on the environment and proposed measures to mitigate any significant environmental effects.

The proposed change is a modification of the SEC certification and site boundaries to incorporate the permanent addition of GL1. The potential air quality and public health impacts of GL1 have been analyzed in the petition for the carbon capture unit submitted in 2023. The FRAQMD PTO will remain in effect with the like-kind replacement of the GL1 units. Existing infrastructure, including the gas line, the transmissions interconnection, and plot plan will be the same as the exiting units, and no ground disturbance in previously undisturbed areas is currently proposed. Therefore, the proposed modifications will not result in any new or different environmental impacts from baseline conditions.

4. Section 1769(a)(1)(E): Analysis of compliance with applicable laws, ordinances, regulations, and standards.

The proposed change will not impact SEC's ability to comply with applicable laws, ordinances, regulations, and standards.

5. Section 1769(a)(1)(F): Discussion of how the proposed change would affect the public.

The proposed change will not adversely affect the public. The proposed change does not result in new environmental impacts from existing baseline conditions. There are no significant adverse effects on property owners that will result from the adoption of the change proposed.

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6. Section 1769(a)(1)(G): 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

No off-site linears will be affected by the proposed change. A list of property owners within 1,000 feet of the SEC site will be submitted directly to the Compliance Project Manager to protect the privacy interests of the property owners.

7. Section 1769(a)(1)(H): Discussion of the potential effects on nearby property owners, residents, and the public.

The proposed project will have no significant environmental effects and will be in compliance with applicable LORS. Therefore, no nearby property owners, residents, or the public will be adversely affected by the modifications. The addition of the GL1 capacity to SEC will provide grid reliability benefits.

8. Section 1769(a)(1)(I), this section provides a discussion of exemptions from the California Environmental Quality Act that applies to approval of the project change.

The proposed modification is exempt from the California Environmental Quality Act ("CEQA") under several provisions. First, the proposed modification is exempt under the common sense exemption. (See, 14 C.C.R. § 15061.) GL1 is located on the site of a previously decommissioned power plant, and, most recently, has been utilized for power generation since 2021. Modification of the SEC certification to incorporate the existing GL1 has no possibility for causing a significant effect on the environment because the air quality impacts of GL1 has already been analyzed. Both SEC and GL1 will continue to operate in compliance with existing permits, which will ensure that there will be no potential air quality and public health impacts from the proposed change. Further, no ground disturbance in previously undisturbed areas is proposed, as GL1 will continue to utilize existing interconnections and infrastructure. Existing conditions of certification will ensure that any activities to make GL1 permanent will not cause a significant effect on the environment.

The proposed modification is also categorically exempt under Section 15301 of the CEQA Guidelines as the operation of an existing facility that involves negligible or no expansion of an existing use. Both SEC and GL1 will continue existing operations, and GL1 will constitute a negligible expansion of SEC's currently permitted generating capacity.

The proposed modification is also categorically exempt under Section 15302 of the CEQA Guidelines as a replacement or reconstruction of existing facilities, as the new components will replace existing GL1 equipment involving negligible or no expansion of capacity.