

DOCKETED

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Project Title:	Compliance - Application for Certification for SMUD's Campbell Soup Cogeneration Project
TN #:	268460
Document Title:	Staff Approved Project Change for the Campbell Power Plant Static Frequency & Excitation System
Description:	Staff Approved Project Change for the Campbell Power Plant Static Frequency & Excitation System Petition to Amend
Filer:	Ashley Gutierrez
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STATEMENT OF STAFF APPROVAL OF POST CERTIFICATION CHANGE CAMPBELL POWER PLANT (93-AFC-03C)

On December 12, 2025, the Sacramento Municipal Utility District (SMUD), the project owner, filed a Post Certification Petition for Changes in Project Design, Operation or Performance and Amendments to the Commission Decision (Petition) ([TN 267906](#)) with the California Energy Commission (CEC) requesting to amend the Campbell Power Plant (CPP) Final Commission Decision (Final Decision).

The CPP is a 158-megawatt facility certified by the CEC in November 1994 that began commercial operation in October 1997. The CPP is located at 3215 47th Avenue in Sacramento.

DESCRIPTION OF PROPOSED CHANGE

On September 8, 2025, SMUD submitted a Project Change Questionnaire (PCQ) to the CEC to update the CPP's existing combustion turbine's static frequency converter and static excitation system with a replacement in-kind. The combustion turbine manufacturer, Siemens, proposed to disassemble and remove the existing systems and install and commission the new systems. The upgrade would not require any ground disturbance and would be performed over ten workdays (two weeks) with up to ten workers. The CEC issued a letter on September 19, 2025, indicating that the activities described in the PCQ were not subject to California Code of Regulations, title 20, section 1769, and did not require submittal of a post-certification petition. The assessment was conditioned on the basis of the scope of work described in the PCQ not changing.

In November 2025, SMUD determined that the electrical component replacement would require a brief commissioning period during which the turbine would be operating at very low firing rates for approximately one hour, which could result in elevated emissions of carbon monoxide (CO) beyond those allowed in the routine steady-state and startup emission limits. This commissioning issue required SMUD to modify its air permit with the Sacramento Metropolitan Air Quality Management District (SMAQMD) to allow for the commissioning of the new equipment, triggering the need for this post-certification petition.

To access the petition to amend, go to the [CEC's project webpage](https://www.energy.ca.gov/powerplant/combined-cycle/campbell-power-plant), <https://www.energy.ca.gov/powerplant/combined-cycle/campbell-power-plant>. In the box labeled "Compliance Proceeding" click on the [Docket Log \(93-AFC-03C\)](#) and locate the petition by the transaction number noted above.

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), CEC staff (staff) may approve the petition 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 will 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		Yes
Biological Resources			X		Yes
Cultural Resources			X		Yes
Efficiency				X	
Facility Design					Yes
Geological and Paleontological Resources			X		Yes
Hazardous Materials Management			X		Yes
Land Use				X	Yes
Noise and Vibration			X		Yes
Public Health			X		Yes
Reliability					
Socioeconomics				X	
Soil and Water Resources				X	Yes
Traffic and Transportation			X		Yes
Transmission Line Safety and Nuisance				X	Yes
Transmission System Engineering					Yes
Visual Resources				X	Yes
Waste Management			X		Yes
Worker Safety and Fire Protection			X		Yes

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 or require a change to any conditions of certification. The bases for each of staff's conclusions are provided below:

AIR QUALITY

As discussed in the Air Quality staff analysis located at the end of this document , significant air quality impacts are not expected from the proposed in-kind replacement of components within the combustion turbine's static excitation system and static frequency converter. The proposed modifications would not result in changes to the project's permitted daily, quarterly, or annual emission limits. The upgrade would not require any ground disturbance; therefore, the proposed activities are unlikely to impact air quality especially to those of sensitive groups or to the environment. Additionally, the temporary increase in CO emissions during the commissioning period would not result in any adverse environmental impacts to air quality or the environment.

Existing Conditions of Certification (COCs) **AQ-7** and **AQ-CM11** in the Final Decision would ensure continued compliance with applicable LORS and would ensure less than significant impacts related to air quality impacts. Therefore, the proposed activities would result in a less than significant adverse direct, indirect, or cumulative impact to air quality. Greenhouse gas impacts would also remain less than significant.

BIOLOGICAL RESOURCES

Impacts to biological resources are not expected from the proposed in-kind replacement of components within the combustion turbine's static excitation system and static frequency converter. The proposed modifications would not result in physical changes or ground disturbance within the existing project site; therefore, the proposed activities are unlikely to impact sensitive species or habitats. Additionally, the potential temporary increase in CO emissions during the commissioning period would not result in any adverse environmental impacts to adjacent sensitive habitats.

The project would remain in compliance with applicable LORS pertaining to biological resources and the proposed activities would result in a less than significant adverse direct, indirect, or cumulative impact to biological resources.

CULTURAL RESOURCES

Activities associated with this petition to amend would not be expected to affect cultural resources as no excavation would be needed to install the equipment. Equipment laydown and parking would use existing paved areas.

Additionally, to minimize any potential construction impacts to a less-than-significant level, the relevant COCs, particularly **CUL-1**, **CUL-2**, and **CUL-3** would be implemented for all construction activities if ground disturbance in native soils become necessary.

EFFICIENCY

This petition to amend would not affect the power plant's efficiency. The static frequency converter and static excitation system are used during turbine startup and commissioning and do not influence fuel input, heat rate, or electrical output during normal operation. The brief commissioning period associated with testing the new equipment would not result in changes to the plant's maximum net output at the interconnection point or its long-term operating efficiency. No LORS apply to power plant efficiency.

FACILITY DESIGN

The petition to amend would not involve construction or ground disturbing activities. The project would continue to meet the existing Facility Design COCs adopted in the Final Decision.

GEOLOGICAL AND PALEONTOLOGICAL RESOURCES

The project would update existing combustion turbines within existing facilities on previously disturbed land. Construction must comply with the 2025 CBC, applicable Facility Design COCs, and all applicable LORS. Compliance during construction would mitigate potential impacts from geologic hazards, especially strong seismic ground shaking, that may occur during the lifetime of the project to less than significant.

Construction and operation would not include ground disturbing activities. The modification would have less than significant impacts on existing geologic hazards. The project would have no impacts on paleontological, mineral, and geologic resources of commercial, recreational, and scientific value.

HAZARDOUS MATERIALS MANAGEMENT

The proposed changes to the commissioning CO emission limits contained in the Hazardous Materials Management COCs and the corresponding air quality permit from SMAQMD would not involve extremely hazardous materials. The petition to amend does not involve construction or ground disturbing activities. Commissioning activities related to the petition to amend would not require additional hazardous materials beyond those listed in the Final Decision. Compliance with applicable LORS would ensure less than significant impacts related to hazardous materials management. Therefore, the proposed changes would have a less than significant impact to the offsite public or the environment.

LAND USE

The proposed in-kind component replacement would occur onsite and would not result in a change in land use. There are no land use impacts, and the facility would remain in compliance with applicable LORS.

NOISE AND VIBRATION

Activities associated with this petition to amend would be identical to those that take place during normal maintenance events and scheduled outages. Any noise generated during these activities would be low, temporary, and intermittent. Therefore, the noise generated would result in a less-than-significant impact with the implementation of the existing Noise and Vibration COCs in the Final Decision.

The operational noise would not be affected as a result of this petition to amend. Furthermore, the project would continue to meet operational noise requirements established in the Final Decision. Therefore, the modifications proposed in this petition would result in a less-than-significant impact due to operational noise.

PUBLIC HEALTH

Impacts to public health are not expected from the proposed in-kind replacement of components within the combustion turbine's static excitation system and static frequency converter. The construction-related activities associated with this upgrade are not expected to result in any significant public health impacts. The temporary commissioning that would occur would not affect any toxic air contaminant emissions. Exhaust parameters and emission rates would remain the same as when the facility is expected to return to its normal operating parameters after the 4-day commissioning

period terminates; therefore, the proposed activities are unlikely to impact public health especially to those of sensitive groups or to the environment. Additionally, the potential temporary increase in CO emissions during the commissioning period would not result in any adverse environmental impacts to public health or the general population.

The project would remain in compliance with applicable LORS pertaining to public health and the proposed activities would result in a less than significant adverse direct, indirect, or cumulative impact to public health.

RELIABILITY

The modifications proposed in this petition would not adversely impact the reliability or power generation capability of the project and would support reliable turbine startup and recovery following outages.

SOCIOECONOMICS

The proposed in-kind component replacement would involve up to ten workers over a two-week period. No workforce related impacts on population, housing, public services, and recreation would occur.

SOIL AND WATER

The installation of components to upgrade an existing combustion turbine would not involve activities that would require soil disturbance or change water needs for the project. Further, the proposed modification would not result in modification to the existing Soil and Water Resources COCs. In addition, the modifications would be covered under an existing Storm Water Management Plan and Erosion and Sediment Control Plan under the state Industrial General Permit for stormwater management. Therefore, the modification would remain in compliance with existing COCs and would have no impact in terms of soil and water resources.

TRAFFIC AND TRANSPORTATION

The proposed in-kind component replacement would be performed over ten workdays (two weeks) with up to ten workers. Impacts to transportation, including vehicle miles traveled, would be less than significant. The facility would remain in compliance with applicable LORS.

TRANSMISSION LINE SAFETY AND NUISANCE

The proposed changes would not change the existing level of electrical field or electro magnetic field from the substation equipment or the transmission system. Therefore, the existing COCs would ensure compliance with applicable LORS and would continue to minimize impacts related to transmission line safety and nuisance to less than significant. Thus, the proposed changes would have a less significant impact on the public.

TRANSMISSION SYSTEM ENGINEERING

This petition to amend would not result in any changes to the existing transmission lines; therefore, there would be no impacts to transmission system engineering. The project would continue to comply with applicable LORS and would not require any change to the COCs.

VISUAL RESOURCES

The proposed in-kind component replacement would not introduce a visual change to the existing physical environment on the site or in the surrounding vicinity. There would be no impacts to visual resources, and the facility would remain in compliance with applicable LORS.

WASTE MANAGEMENT

The installation of components to upgrade an existing combustion turbine would not involve activities that would require modification to the existing Waste Management COCs. Generated solid waste would still be required to comply with existing LORS and COCs included in the Final Decision. Therefore, the modification would have a less than significant impact related to solid waste management and would remain in compliance with existing COC.

WORKER SAFETY AND FIRE PROTECTION

The proposed changes do not involve construction or ground disturbing activities. Existing COC **SAFETY-1** would ensure compliance with applicable LORS and would ensure less than significant impacts related to worker safety and fire protection. Therefore, the proposed changes would have a less than significant impact to the offsite public or worker health and safety.

CALENVIROSCREEN 4.0

Staff reviewed CalEnviroScreen 4.0 data to determine whether the United States census tract where the Campbell Power Plant (CPP) is located (6067004502) 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 93 and, thus, is identified as a disadvantaged community¹.

ENVIRONMENTAL JUSTICE

Environmental Justice Figure 1 shows 2020 census blocks in the six-mile radius of the CPP a minority population greater than or equal to 50 percent. The population in these census blocks represents an environmental 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 Sacramento City Unified and Washington 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 geographies. Thus, it is considered an EJ population based on low income as defined in *Guidance on Considering Environmental Justice During the Development of*

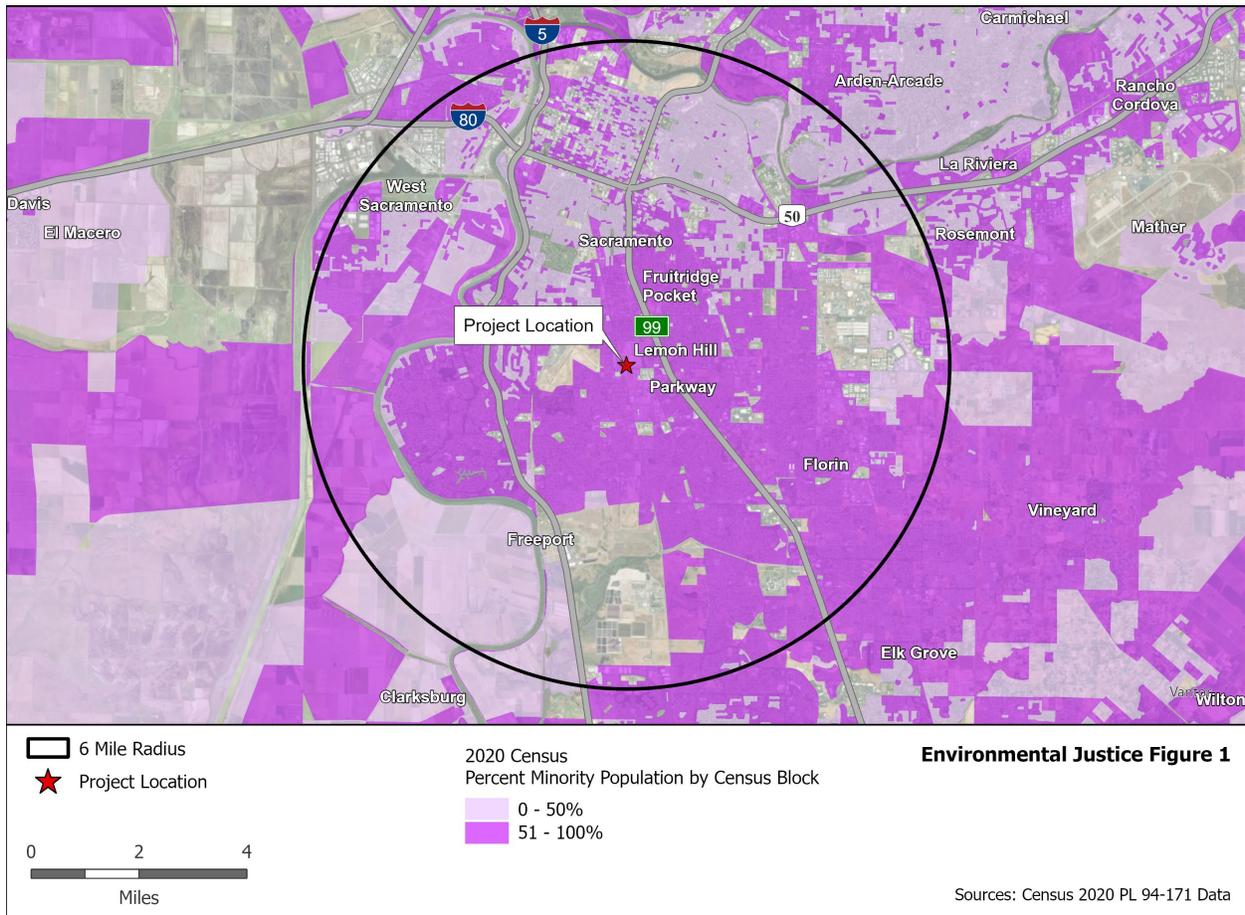
¹ The four categories of geographic areas identified by CalEPA as disadvantaged are: 1) Census tracts receiving the highest 25 percent of overall scores in CalEnviroScreen 4.0, 2) Census tracts lacking overall scores in CalEnviroScreen 4.0 due to data gaps, but receiving the highest 5 percent of CalEnviroScreen 4.0 cumulative pollution burden scores, 3) Census tracts identified in the 2017 DAC designation, regardless of their scores in CalEnviroScreen 4.0, and 4) Lands under the control of federally recognized Tribes. Source: CalEPA Final Designation of Disadvantaged Communities: May 2022 <https://calepa.ca.gov/envjustice/ghqinvest/>

Regulatory Actions. **Environmental Justice – Figure 2** shows where the boundaries of the school district are in relation to the six-mile radius around the CPP site.

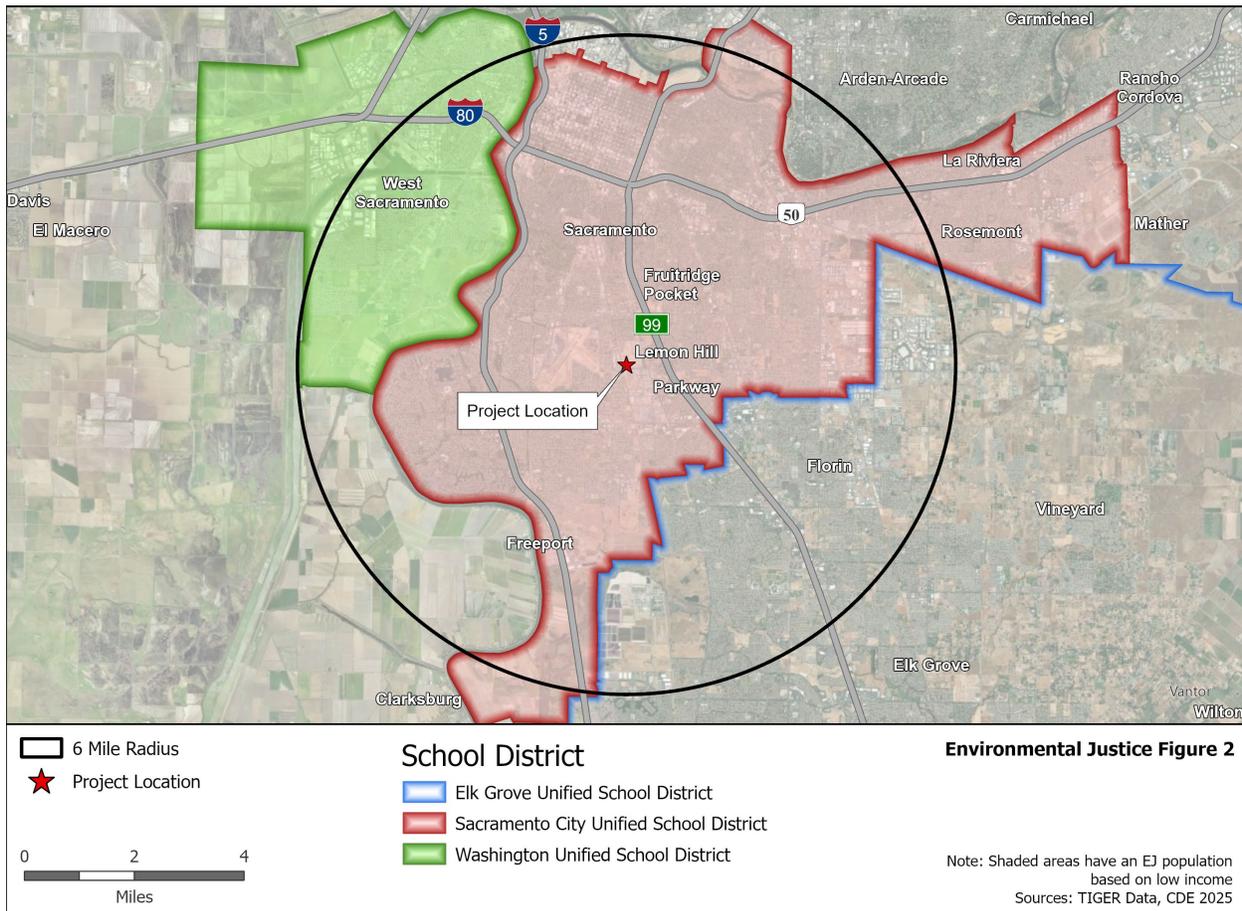
**Environmental Justice – Table 1
 Low Income Data within the Project Area**

SACRAMENTO COUNTY SCHOOL DISTRICTS IN SIX-MILE RADIUS	Enrollment Used for Meals	Free or Reduced Price Meals	
Sacramento City Unified	42,337	27,154	64.1%
Elk Grove Unified	64,358	37,653	58.5%
REFERENCE GEOGRAPHY			
Sacramento County	258,235	161,714	62.6%
YOLO COUNTY SCHOOL DISTRICTS IN SIX-MILE RADIUS	Enrollment Used for Meals	Free or Reduced Price Meals	
Washington Unified	8,323	5,344	64.2%
REFERENCE GEOGRAPHY			
Yolo County	29,590	17,166	58.0%
Source: CDE 2025. California Department of Education, DataQuest, Free or Reduced Price Meals, District level data for the year 2023-2024, http://dq.cde.ca.gov/dataquest/ .			

**FIGURE 1 ENVIRONMENTAL JUSTICE
MINORITY POPULATION**



**FIGURE 2 ENVIRONMENTAL JUSTICE
LOW INCOME POPULATION**



Environmental Justice Conclusions

For this petition, the following technical areas 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**. Staff has determined, the four-day temporary start up and calibration air quality variance would not cause significant impacts for any population in the project's six-mile radius, including the EJ population. Impacts to the EJ population are less than significant.

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, including the four-day temporary start up and calibration variance for the installation of the in-kind component replacement for the static frequency and excitation systems, 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; and
3. The changes will not require a change to, or deletion of, a condition of certification adopted by the Commission in the final decision or subsequent amendments.

Staff also concludes that none of the findings specified in section 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. 14, 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) . 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/campbell-power-plant), <https://www.energy.ca.gov/powerplant/combined-cycle/campbell-power-plant> has a link to the petition and this Statement of Staff Approval on the right side of the webpage in the box labeled "Compliance Proceeding". Click on the "[Docket Log \(93-AFC-03C\)](#)" option.

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/campbell-power-plant) and click on either the "[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. 93-AFC-03C
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](#).

If you have questions about this document, please contact Compliance Project Manager Ashley Gutierrez, Compliance Monitoring and Enforcement Unit, Safety and Reliability Branch, at (916) 834-0440, or via email at Ashley.Gutierrez@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.

News media inquiries should be directed to the CEC's Media Office at (916) 654-4989, or by email at mediaoffice@energy.ca.gov.

Subscription List: 784

SACRAMENTO POWER AUTHORITY'S CAMPBELL COGENERATION PROJECT (93-AFC-3C)

Staff Approved Project Change
Air Quality, Greenhouse Gases, and Public Health
Jacquelyn Record

INTRODUCTION

In this analysis, staff evaluates whether the modified CSG project would result in significant impacts to air quality, greenhouse gases, or public health and whether the modified CSG would remain in compliance with applicable laws, ordinances, regulations, and standards (LORS).

BACKGROUND AND AMENDMENT DESCRIPTION

The project owner requested the Sacramento Metropolitan Air Quality Management District (SMAQMD) to include a temporary CO emission limit for the commissioning period, not to exceed four days. All other pollutants are expected to comply with existing emission limits, including daily, quarterly, and annual permit limits. The CEC's certification already has existing COCs covering these types of activities.

On November 21, 2025, the SMAQMD issued an Engineering Evaluation of the proposed changes and a preliminary "Authority to Construct" (SMAQMD 2025) temporarily modifying two existing SMAQMD permit conditions to allow for an increase in start-up CO emission limits during the four-day commissioning period. The proposed modification would redefine the definition of start-up to allow for a commissioning period for this equipment replacement testing. CEC staff believes these temporary changes would not require the modification to the current Air Quality conditions of certification.

ANALYSIS

AIR QUALITY

This analysis includes the evaluation of the emissions that would result from commissioning of the new equipment. CO is the only criteria pollutant in which emissions may be elevated above the routine steady-state and startup emission limits during the commissioning period. An analysis of the CO emissions is provided in more detail below. The relevant SMAQMD Authority to Construct conditions have been

reviewed by CEC staff (staff). Staff concludes that changes requested by SPA would comply with applicable federal, state, and SMAQMD air quality LORS and the amended project would not cause significant air quality impacts.

SES/SFC EQUIPMENT UPGRADE

The petitioner requested to replace the combustion turbine's static excitation system and static frequency converter. This electrical equipment provides assistance to accelerate the gas turbine up to its operating speed. Though this equipment does not have any direct relation to emissions. The turbine must be operated in a certain manner to verify that the new equipment is operating correctly. There is no expected increase in fuel usage or emissions as a result of this upgrade during normal operation. The installation and operational related impacts associated with this upgrade would not result in any significant air quality impacts.

CONSTRUCTION RELATED EMISSIONS

The PTA proposes to disassemble/remove the existing systems and install/commission the new systems. The upgrade would not require any ground disturbance and would be performed over ten (10) workdays (2 weeks) with up to ten (10) workers (SPA 2025). The level of construction activity that would be associated with the SES/SFC equipment upgrade is consistent with other routine maintenance performed on the project. The construction-related activities associated with this upgrade would not result in any significant air quality impacts.

COMMISSIONING IMPACTS ANALYSIS

The owner expects that the worst-case CO emissions would not exceed 1,258.8 pounds per hour (lbs/hr) and 1,258.8 lbs/day during the 4-day commissioning period of the new system. The air district conducted an air dispersion modeling analysis using the American Meteorological Society/Environmental Protection Agency Regulatory Model (AERMOD) to analyze potential ambient air quality impacts associated with the temporary CO start-up emissions at the facility during commissioning of the new system.

As shown in **Air Quality Table 1**, the modeled concentrations from the worst-case start-up emissions were combined with worst-case background concentrations to evaluate the total impact from the 4-day commissioning period. This is a conservative approach because it assumes the greatest project impacts occur concurrently with the worst-case background concentration, a scenario that may never occur. Background

concentrations are determined from the measured pollutant values at surrounding representative air monitoring site.

The total impacts are compared with the ambient air quality standards for CO to determine whether the project’s emission impacts after the modifications would cause a new exceedance of the ambient air quality standards or would contribute to an existing exceedance.

Air Quality Table 1
Proposed CO Modeling Impact Results

Pollutant	Averaging Period	Project Impact (µg/m ³)	Background (µg/m ³)	Total Impact (µg/m ³)	Limiting Standard (µg/m ³)	SIL (µg/m ³)	Percent of Limiting Standard
CO	1-hour	4,438	2,000	6,438	23,000	2,000	28%
	8-hour	71	1,600	1,671	10,000	500	17%

Source: SMAQMD 2025, staff analysis.

Air Quality Table 1 shows that the facility would not significantly impact the ambient air surrounding the facility for the 1-hr or 8-hr CO limiting AAQS. To show compliance with the state and federal standard when the value is over the significant impact level (SIL) the background concentration is added to the modeled value. The worst-case project impacts combined with the worst-case background concentrations would not exceed the 1-hr or 8-hr CO limiting AAQS. Therefore, this temporary project modification does not have a potential for a significant environmental effect.

Furthermore, the CEC license includes an existing recommissioning COC **AQ-CM11**, which limits the maximum allowable hourly emissions to 500 lbs/hr averaged over any consecutive 3-hour period. With the maximum hourly emission rate of 1,258 lbs/hr and daily emissions capped at 1,258 lbs/day in existing COC **AQ-7** during the commissioning of the new system, the 3-hour average CO emissions would be 419.3 lb/hr (=1,258 ÷ 3), which is below the 500 lb/hr limit specified in COC **AQ-CM11**. The change would not cause the project to fail to comply with COC **AQ-CM11**.

Significant air quality impacts are not expected from the proposed in-kind replacement of components within the combustion turbine’s static excitation system and static frequency converter. The proposed modifications would not result in significant long-term changes to the project’s permitted CO limits or ground disturbance within the existing project site; therefore, the proposed activities are unlikely to impact air quality especially to those of sensitive groups or to the environment. Additionally, the temporary increase in CO emissions during the commissioning period would not result in any adverse environmental impacts to air quality or the environment.

Existing COCs **AQ-7** (daily emission limits) and **AQ-CM11** (3-hour average hourly emission limits during recommissioning) would ensure continued compliance with applicable LORS and would ensure that air quality impacts remain less than significant. The current CO start-up emission limit of 550 lbs/hr in COC **AQ-6** and normal startup duration of 60 minutes in COC **AQ-13** will still be preserved and will go back into effect after the four-day commissioning period has concluded. Therefore, the proposed activities would result in a less than significant direct, indirect, or cumulative impact to air quality.

GREENHOUSE GASES

The construction-related activities associated with this upgrade are not expected to result in any significant greenhouse gas impacts. The static frequency converter and static excitation system do not influence fuel input, heat rate, or electrical output during normal operation. The brief commissioning period associated with testing the new equipment would not result in changes to the plant's daily, quarterly, or annual emissions as limited by the Air Quality Conditions of Certification **AQ-7** (daily limits) and **AQ-8** (quarterly and annual limits) and would not represent an increase in capacity or fuel usage. No LORS apply to greenhouse gases for this change.

PUBLIC HEALTH

The construction-related activities associated with this upgrade are not expected to result in any significant public health impacts. Impacts to public health are not expected from the proposed in-kind replacement of components within the combustion turbine's static excitation system and static frequency converter. The temporary commissioning that would occur would not affect any toxic air contaminant emissions. Exhaust parameters and emission rates would remain the same as when the facility is expected to return to its normal operating parameters after the 4-day commissioning period terminates; therefore, the proposed activities are unlikely to impact public health especially to those of sensitive groups or to the environment. Additionally, the temporary increase in CO emissions during the commissioning period would not result in any adverse environmental impacts to public health or the general population.

The project would remain in compliance with applicable LORS pertaining to public health and the proposed activities would result in a less than significant direct, indirect, or cumulative impact to public health.

LAWS, ORDINANCES, REGULATIONS, AND STANDARDS COMPLIANCE

Commissioning activities related to the petition to amend would not require additional mitigation beyond those listed in the original Final Decision and subsequent amendments. Compliance with existing COCs would ensure less than significant impacts and continued compliance with applicable LORS.

CONCLUSIONS

The amended project would continue to comply with applicable federal, state, and SMAQMD air quality laws, ordinances, regulations, and standards, and would not cause significant air quality, greenhouse gas, or public health impacts. CEC staff has reviewed the temporary conditions in the SMAQMD Authority to Construct issued on November 21, 2025. Staff is not recommending any new or revised COCs for this temporary commissioning activity because the currently existing Air Quality COCs would apply to the 4-day commissioning event.

No new significant adverse impacts to air quality, greenhouse gases, or public health would likely result from construction and operation of the proposed changes. Potential impacts to air quality, greenhouse gases, and public health due to the temporary nature of the commissioning activities would be mitigated through currently existing Air Quality Conditions of Certification **AQ-7** (daily CO limit) and **AQ-CM11** (3-hour averaged hourly CO limit during recommissioning).

The petition to amend does not involve construction or ground disturbing activities. Commissioning activities related to the petition to amend would not require additional mitigation beyond those listed in the original Final Decision and subsequent amendments. Compliance with existing COCs would ensure less than significant impacts related to air quality, greenhouse gases, and public health. Therefore, the proposed changes would have a less than significant impact to the offsite public or on the environment.

PROPOSED MODIFICATIONS TO THE CONDITIONS OF CERTIFICATION

Staff does not recommend any additional mitigation measures or any changes to any existing COC for air quality.

REFERENCES

CEC 1994. Sacramento Power Authority at Campbell Cogeneration Project, California Energy Commission Decision, California Energy Commission Docket No. 93-AFC-3, Publication No. P800-94-011 (November 30, 1994).

CEC 2019. California Energy Commission - Order Approving Petition to Amend to Replace Potable Water with Recycled Water, California Energy Commission Docket No. 93-AFC-3C, Publication No. TN 226297 (January 11, 2019).

SMAQMD 2025. Engineering Evaluation and Proposed Authority to Construct. Facility Name: Sacramento Power Authority (SPA). Application No. A/C 27118 (November 21, 2025).

SPA 2025. Sacramento Power Authority - Campbell Soup Generating Facility Static Frequency Converter and Static Excitation System Petition to Amend, California Energy Commission Docket No. 93-AFC-3C, Publication No. TN 267906 (December 12, 2025).