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| **Docket Number:** | 15-AFC-01 |
| **Project Title:** | Puente Power Project |
| **TN #:** | 205742 |
| **Document Title:** | Letter to local Building and Construction Trades Council |
| **Description:** | Letter to Tri Counties Building and Construction Trades Council regarding local high skilled labor and Puente Power Project's construction labor needs |
| **Filer:** | Lisa Worrall |
| **Organization:** | California Energy Commission |
| **Submitter Role:** | Commission Staff |
| **Submission Date:** | 8/14/2015 10:58:59 AM |
| **Docketed Date:** | 8/14/2015 |

CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET
SACRAMENTO, CA 95814-5512

August 14, 2015

Tony Skinner
Executive Secretary-Treasurer
Tri Counties Building and Construction Trades Council
3994 East Main Street
Ventura, CA 93006

RE: Construction Workforce for the Proposed Puente Power Project (P3) (15-AFC-1)

Dear Mr. Skinner:

The California Energy Commission is considering an application from NRG Oxnard Energy Center, LLC to construct, own, and operate the Puente Power Project (P3). The proposed location of P3 would be on approximately three acres of the existing 36-acre Mandalay Generating Station (MGS) site at 393 North Harbor Boulevard in Oxnard, Ventura County, California. The project would replace two gas-fired steam-generating units (Units 1 and 2) at MGS with a natural gas-fired, combustion turbine generator and associated auxiliaries. Full-load output under operating and ambient conditions would range from approximately 241 net megawatts (MW) to a peak of 271 net MW. The project would upgrade and repurpose existing maintenance, warehouse, transmission interconnections, and ancillary systems on the MGS site to the extent feasible. No offsite linear developments are currently proposed as part of the project. Construction laydown and parking areas would be within the MGS site. If P3 is approved and developed, MGS Units 1 and 2 would be retired by the completion of commissioning of the new facility. Demolition of MGS Units 1 and 2 is not proposed as part of the project.

The existing MGS power plant currently has two operating steam generating units (Units 1 and 2) and one operating gas combustion turbine unit (Unit 3). If approved by the Energy Commission, project construction would occur over a 21-month period from October 2018 through June 2020. Commercial operation of P3 is expected by June 2020.

The project applicant's entire Application For Certification (AFC) is available on the Energy Commission's website at: https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=15-AFC-01. Section 4.10 Socioeconomics would be the most pertinent section to review as well as Table 2.9-1 in Section 2.0 Project Description.

As part of the environmental review and licensing process for the proposed project, Energy Commission staff evaluates the potential for the construction workforce to impact population, housing, and public services (e.g., police protection) in the area where the project is proposed. Information on the construction workforce in the region is extremely useful in the

analysis of potential impacts to these resources. The applicant anticipates the construction workforce would most likely be drawn from Ventura and Los Angeles counties. The applicant also anticipates that the majority of construction workers (90 percent on average) would commute to the project site on a daily basis.

Project activities include construction of the proposed P3 facility and decommissioning of MGS Units 1 and 2. An average construction workforce of 48 workers is expected over the 21-month construction period. During peak-construction, month 8 (May 2019), the construction workforce would total about 90 workers (74 craft laborers plus 16 construction staff). The project labor needs by craft/trade during peak construction are presented in Table 2.9-1 of the Project Description of the AFC (see enclosure).

The applicant estimates that operation and maintenance of the project would require 17 skilled full-time employees which would be drawn from the existing MGS staff. Therefore, no additional operational workers would be hired.

Based on staff's research and communication with other building and construction trades councils, staff understands that construction workers will commute as much as two hours to construction sites from their homes and one hour during operations, rather than relocate. Staff also understands that construction workers do not move their families with them when working on a project. To better understand the commuting habits of construction workers in the local region, I have prepared a list of questions for your consideration and response. This information will be useful to me in evaluating the potential effects of the proposed P3 project on local population, housing, and public services:

1. Based on your experience and knowledge of the labor workforce in Ventura County, the project's construction workforce needs, labor availability, and the location and type of the project proposed, how much of the workforce would be likely to seek lodging closer to the project site?

2. Considering the construction period is 21 months, what, if any, concerns do you have or problems you foresee about the project and associated labor needs?

3. Are you aware of any other construction projects in the area that would affect labor availability?

Please provide your responses to the above questions and any comments you may have regarding the construction labor for the proposed project by September 14, 2015. Send your responses to my attention. Thank you in advance for your time and assistance.

Sincerely,

Original signed by

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Enclosures:
Map showing the approximate location of the project site (from the AFC)
Map showing the project site plan (from the AFC)
Construction workforce (peak month by craft) (created from the AFC)


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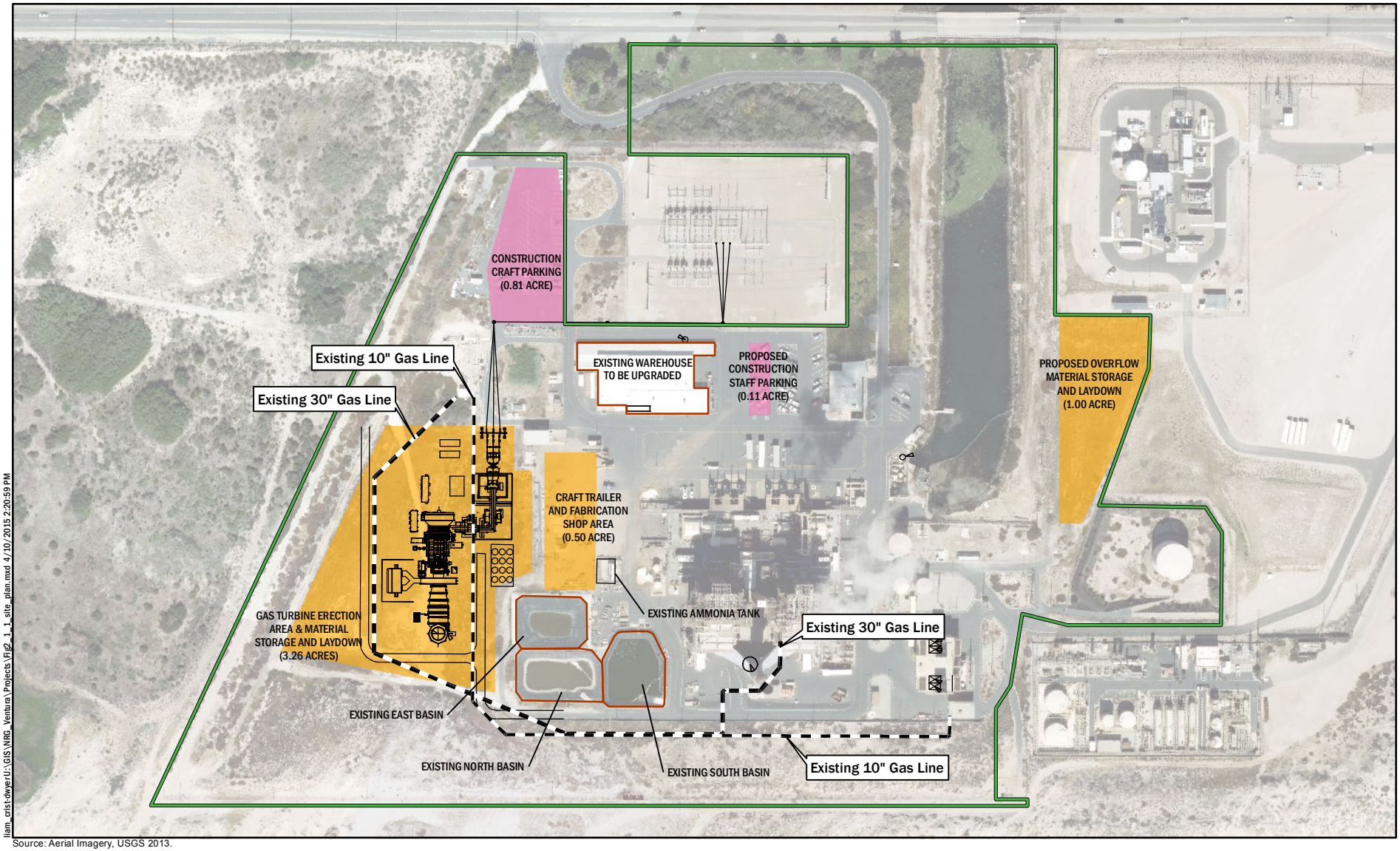
Source: ESRI Basemap

## SITE VICINITY MAP

Puente Power Project Site

NRG
Puente Power Project
April 2015 Oxnard, California

**FIGURE 1-1**




Source: Aerial Imagery, USGS 2013.

Mandalay Generating Station Property

Construction and Laydown Areas

Existing Parking Used During Construction

0 125 250 Feet

## SITE PLAN

NRG
Puente Power Project
April 2015 Oxnard, California

**FIGURE 2.1-1**

## Craft/Trade and Construction Staff Project Labor Needs

| Craft/Construction Staff | Project Labor Needs<br>Peak Construction Period<br>(May 2019, Month 8) |
|---|---|
| CRAFT | |
| Boilermaker | 0 (10) |
| Carpenter | 12 |
| Cement Finisher | 6 |
| Electrician | 10 |
| Ironworker | 8 |
| Laborer | 10 |
| Millwright | 8 |
| Operator | 6 |
| Painters and Insulators | 2 (8) |
| Pipefitter | 10 |
| Teamster | 2 |
| CONSTRUCTION STAFF | |
| Business Manager | 1 |
| Civil/Structural Engineer | 1 |
| Civil/Structural Superintendent | 1 |
| Construction Manager | 1 |
| Document Control | 1 |
| Electrical Engineer | 1 |
| Electrical Superintendent | 1 |
| Field Engineering Manager | 1 |
| Mechanical/Piping Engineer | 1 |
| Mechanical/ Piping Superintendent | 1 |
| Payroll Clerk | 1 |
| Procurement Manager | 1 |
| Project Controls Manager | 1 |
| Quality Control Manager | 1 |
| Receiving Manager | 1 |
| Safety Manager | 1 |
| Total | 90 |

**Note**: ( ) Number in parenthesis represents the peak workforce by trade type during construction.
**Source:** Puente Power Project AFC, Table 2.9-1, pg. 2-53 to 2-55.