

## DOCKETED

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<b>Project Title:</b>	Ivanpah Solar Electric Generating System (Compliance)
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<b>Document Title:</b>	Ivanpah Petition for Staff Approved Modification
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## **IVANPAH SOLAR ELECTRIC GENERATING SYSTEM (07-AFC-05C).**

### **PETITION FOR STAFF APPROVED MODIFICATION**

Pursuant to Section 1769 of the CEC Siting Regulations, each of Solar Partners I, LLC, Solar Partners II, LLC, and Solar Partners VIII, LLC (collectively, the “Petitioner”) petitions the California Energy Commission (“CEC”) for approval of an Insignificant Project Change to the Certification for the Ivanpah Solar Electric Generating System (“Ivanpah SEGS” or the “Project”) (07-AFC-05C).

**Pursuant to Section 1769 (a)(1)(A) and (B), this section provides a complete description of the proposed modifications, including new language for affected conditions, and the necessity for the modifications.**

The Petitioner proposes to modify operation and maintenance (O&M) activities to accommodate mirror washing during daylight hours in addition to the currently permitted night time hours. The proposed Insignificant Project Change does not require a revision to any Condition of Certification. The modifications are necessary to allow proper and safe functioning of mirror washing equipment. A description of the washing process is provided below.

The procedure for mirror washing will consist of positioning the heliostats to be washed. All mirrors will be placed to minimize glint and glare to occur off of the project site during the washing activities by placing heliostats in the mirror washing position (near vertical). Following washing, mirrors will be returned to service. The mirrors will be washed by one of two methods. The first method is to utilize mirror washing machines that have extendible brushes that wash the mirrors. The second is to utilize hand washing techniques. In both cases the use of water will be minimized and comply with the conditions of certification.

**Pursuant to Section 1769(a)(1)(C), a discussion is required if the modification is based on information that was known by the petitioner during the certification proceeding, and an explanation of why the issue was not raised at that time.**

The request for daytime mirror washing is based on information that became known to the Petitioner after the close of the Certification proceeding. Specifically, experience in the field during the construction and commissioning phase has demonstrated that daytime mirror washing facilitates the ability of equipment operators to accurately place the equipment to perform mirror washing.

**Pursuant to Section 1769(a)(1)(D), a discussion is required on whether the modification is based on new information that changes or undermines the assumptions, rationale, findings, or other bases of the final decision, and explanation of why the change should be permitted.**

The time of day that mirror washing is performed does not change or undermine the assumptions, rationale, findings, or other bases of the Final Decision. No Conditions of Certification are affected. The changes should be allowed for required facility maintenance.

**Pursuant to Section 1769(a)(1)(E), an analysis of the impacts the modifications may have on the environment and proposed measures to mitigate any significant adverse impacts is required.**

Daytime mirror washing as described above will not result in any impacts on the environment. No Conditions of Certification are affected, and thus no mitigation measures and no changes to Conditions of Certification are required. The potential impacts associated with mirror washing and heliostat positioning has previously been found to be less than significant. Accordingly, no mitigation measures are necessary.

**Pursuant to Section 1769(a)(1)(F), a discussion of the impact of the modification on the facility's ability to comply with applicable laws, ordinances, regulations, and standards is required.**

There are no applicable LORS related to daytime mirror washing. Thus, the Project will remain in compliance with all applicable LORS.

**Pursuant to Section 1769(a)(1)(G), a discussion of how the modifications affect the public is required.**

Daytime mirror washing will not result in any physical changes to human health or the environment, inside or outside the fence line of the Project. There are no significant adverse effects on the public or any surrounding property owners off-site of these BLM-managed lands that will result from daytime mirror washing.

**Pursuant to Section 1769(a)(1)(H), a list of property owners potentially affected by the modification is required.**

Pursuant to the requirements of Section 1769(a)(1)(H), the Petitioner is providing a list of property owners potentially affected by the modification. The property owner list created for the project AFC has not changed because no new property owners have moved within 1,000 feet of the project since the issuance of the CEC Final Decision. That list is reproduced and attached to this petition.

**Pursuant to Section 1769(a)(1)(I), a discussion of the potential effect on nearby property owners, the public and the parties in the application proceedings is required.**

Daytime mirror washing will have no significant environmental effects and will be in compliance with applicable LORS. Therefore, daytime mirror washing will have no impact on nearby property owners, the public, or any other parties.