

## DOCKETED

<b>Docket Number:</b>	07-AFC-06C
<b>Project Title:</b>	Carlsbad Energy Center - Compliance
<b>TN #:</b>	203088
<b>Document Title:</b>	Building and Construction Trades Council letter
<b>Description:</b>	Letter to San Diego BCTC regarding labor requirements for the amended CECP
<b>Filer:</b>	Lisa Worrall
<b>Organization:</b>	CEC/ Lisa Worrall
<b>Submitter Role:</b>	Commission Staff
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**CALIFORNIA ENERGY COMMISSION**1516 NINTH STREET  
SACRAMENTO, CA 95814-5512

September 22, 2014

Tom Lemmon  
Business Manager  
San Diego County Building and Construction Trades Council  
3737 Camino del Rio South, Suite 202  
San Diego, California 92108

RE: Construction and Operation Workforce for the Proposed amended Carlsbad Energy Center Project (07-AFC-06C)

Dear Mr. Lemmon:

The Warren-Alquist Act (Public Resources Code § 25000 et. seq.) gives the California Energy Commission (Energy Commission) the exclusive jurisdiction over the permitting of thermal power plants with a net generating capacity of 50 megawatts or larger and appurtenant related facilities to serve it. As part of this jurisdiction, the Energy Commission must evaluate a project's conformance with local, state, and federal laws, ordinances, regulations and standards.

The Energy Commission is considering the May 2, 2014, Petition to Amend (PTA) the Energy Commission's June 2012 Final Decision on the Carlsbad Energy Center Project (licensed CECP). The PTA was filed by Carlsbad Energy Center LLC, the project owner, who is an indirect wholly owned subsidiary of NRG Energy, Inc.

Prior to the May 2nd PTA submittal to the Energy Commission, the project owner filed a PTA on April 29, 2014 requesting to remove obsolete facilities to support the construction of the Carlsbad Energy Center Project. At this time, the two petitions are separate requests, but the Committee assigned to the project may combine the two petitions. The April 2014 PTA request to remove three above-ground storage tanks (numbers 1, 2 and 4), associated piping and oil sands under the tanks, and a berm between two tanks (numbers 4 and 5).

The amended CECP as described in the May 2014 PTA, would be located on a 30-acre parcel on the northeast corner of the Encina Power Station (EPS) in the city of Carlsbad, San Diego County. The new facility would be constructed on land occupied by the "east tank farm" and above ground storage tanks (ASTs) 4, 5, 6 and 7. The PTA also requests Energy Commission approval to decommission and demolish EPS generating Units 1-5.

The changes from the licensed CECP to the amended CECP relevant to labor requirements involve the construction and operations workforce numbers and duration of construction. Construction for the amended CECP would take 46 months (24 months for the amended CECP plant and 22 months for EPS demolition). For the amended CECP

plant construction and EPS demolition, an average of 120 workers would be employed. Construction of the amended CECP power plant would have a peak workforce of 279, and an average of 169 workers. EPS demolition would take have a peak workforce of 194, and an average workforce of 67.

The project owner estimates that construction of the amended CECP plant would begin in October 2015 and continue until November 2017 when the amended CECP facility would be commercially operational. The project owner estimates demolition of the EPS would begin in November 2018 with completion in November 2020.

The 18-person operations workforce for the amended CECP would come from the existing 50-member EPS operations workforce.

The Petition to Amend is available on the Energy Commission's website at:  
[http://docketpublic.energy.ca.gov/PublicDocuments/07-AFC-06C/TN202287-2\\_20140502T155806\\_CECP\\_Petition\\_to\\_Anend.pdf](http://docketpublic.energy.ca.gov/PublicDocuments/07-AFC-06C/TN202287-2_20140502T155806_CECP_Petition_to_Anend.pdf)

Section 2.0 Project Description and Section 5.10 Socioeconomics would be the most pertinent sections to review, as well as Section 1.0 Executive Summary and Section 5.12 Traffic and Transportation.

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 understand better the commuting habits of construction workers in the local region, staff has prepared a list of questions for your consideration and response. This information will be useful to staff in evaluating the potential effects and impacts of the proposed amended CECP on local population, housing, and public services.

1. Based on your experience and knowledge of the labor workforce in San Diego County, the project's construction demolition and operation workforce needs, labor availability, and location and type of the proposed project, how much of the workforce necessary to complete this project would be likely to seek lodging closer to the Carlsbad project site?
2. Considering the lengthy construction and demolition period (48 months between the 4<sup>th</sup> Quarter of 2015 and the 4<sup>th</sup> Quarter of 2020), what, if any, concerns do you have, or problems you foresee, regarding project and associated labor workforce needs?
3. Staff is aware of several projects proposed and approved in San Diego County that would likely employ similar high skilled workers, such as those required for the amended CECP. Some of the larger-scaled projects include the following:

- a. Interstate 5: Two HOV Lanes and soundwall from Manchester Avenue to SR 78 (Carlsbad and Encinitas)
- b. CIP – Vista/Carlsbad Interceptor Agua Hedionda Lift Station (VC 12) (Carlsbad)
- c. Buena Outfall Force Main Phase 3 (Carlsbad)
- d. Quarry Creek (Carlsbad)
- e. La Costa Town Center Renovation (Carlsbad)
- f. Sports Shinko Condominium Hotel #93-172 (Encinitas)
- g. ENV 13-0007 (Recycled Water Easterly Main Extension Project) (Escondido)
- h. Park Station at the Crossroads of La Mesa Specific Plan EIR (La Mesa)
- i. Shelter Island Boatyard Crane Replacement and Pier Addition Project
- j. Pacific Highlands Ranch, Units 23-28 - Applicant: Pardee Homes (San Diego)
- k. CP Kelco Cooling Tower Replacement (San Diego)
- l. Camino Del Rio Mixed Use (San Diego)
- m. Sunroad Harbor Island Hotel Project & East Harbor Island Subarea PMPA (UPD 83356-EIR-783) (San Diego)
- n. Ocotillo Wells Solar Major Use Permit (San Diego County)
- o. Pier 1 North Drydock, Future Real Estate Agreements & Removal of Cooling Tunnels (San Deigo)
- p. Soitec Solar Projects Program Environmental Impact Report (LanWest, LanEast, Rugged and Tiedrra Del Sol) (San Diego County)
- q. Vista Ridge PC14-293 (Vista)

If would appreciate learning if there are any other projects that staff has not included in the list that would likely use similar high skilled labor and have construction periods that coincide with the amended CECP. It would be most helpful if you could provide your responses to the above questions and any comments you may have regarding the construction and operation labor for the proposed project by October 6, 2014. Please send your responses to my attention. Thank you in advance for your time and assistance. Please call or email me if you have any questions about this request.

Sincerely,

Original signed by

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Enclosure: Map showing the approximate location of the project site  
cc. Mike Monasmith, California Energy Commission Project Manager  
Amanda Stennick, Planner III/Supervisor



Amended Carlsbad Energy Center Project - Project Site

