

DOCKETED

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Thursday, May 19, 2016

Mr. Leonidas Payne
Project Manager
Siting, Transmission and Environmental Protection (STEP) Division
California Energy Commission
1516 Ninth Street, MS-15
Sacramento, CA 95814

Via Certified US Mail and Email

Subject: Docket No 16-SPPE-01, Pomona Repower Project

Dear Mr. Payne:

Union Pacific Railroad notes that in your notice letter, the project referenced above contemplates installation of a General Electric LMS100PA combustion turbine generator near Union Pacific Railroad's tracks at milepost 512.85 of the Alhambra Subdivision.

Union Pacific Railroad objects to any installation within three hundred (300) feet of railroad right of way, measured from the centerline of our track. This objection is based upon the lack of detailed information to fully understand the project and the impact this high power generator may have on Union Pacific Railroad property. We ask that any consideration of the project be subject to a full mitigation study at the expense of AltaGas Pomona Energy, Inc. Any concerns resulting from the mitigation study must be addressed to avoid any damage to Union Pacific Railroad's signal and communication facilities.

Safety is the primary driver for this requested requirement. Unmitigated high voltage power lines in close proximity to railroad tracks can have an adverse affect upon railroad signals, especially grade crossing warning devices. In general, the more power that flows through the wires, the greater effect it has upon the railroad equipment. Union Pacific Railroad reviews proposed installations on or near its right of way by examining factors such as the distance between the installation and the rails and how far any power lines parallel the tracks to evaluate the potential for the power lines to affect the safe operation of railroad signaling equipment.

Other adverse affects on railroad equipment come from ground fault events. These events cause a great deal of energy to flow through the ground from the power company's towers and/or substations, through the rails, and directly into signal equipment. Such events can cause tens or hundreds of thousands of dollars worth of damages during a single event. These occurrences can cause the destruction of railroad equipment for several miles. In one area, well documented events have repeatedly destroyed grade crossing warning devices for several miles. In addition to the potential to cause damage to railroad equipment, railroad personnel or anyone else touching the rails can be subject to injury from electrical shock. Information and application forms concerning requests for encroachments may be found on Union Pacific Railroad's website at:

www.uprr.com/reus/encroach/procedur.shtml and www.uprr.com/reus/encroach/encguide.shtml.

By this letter, Union Pacific Railroad requests further information to permit it to evaluate the proposed installation and its effects in light of railroad engineering standards and other considerations. All rail service requests for this project should be directed to the Regional Manager Paul Marcinko, 562-566-4610. His contact information can be found at <http://www.up.com/customers/ind-dev/contacts/index.htm>

Union Pacific Railroad reserves its rights to present further comments and to seek any legal, administrative, and other remedies that may be necessary to preserve Union Pacific Railroad's franchise and property rights.

Cordially,



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