DOCKETED

Docket Number:	09-AFC-04C
Project Title:	Oakley Genrating Station COMPLIANCE
TN #:	211413
Document Title:	Petition for Project Modification- Support Tower Relocation
Description:	The requested modification is a minor change in the location of generator tie-line conductor support tower 2/21 and a corresponding minor modification to the generator tie-line alignment between tower 2/21 and tower 2/22. There are corresponding minor changes in the locations and shapes of the pull and work area sites that are located outside of the generator tie-line right-of-way and result in both deletions and additions of work areas. These changes result from minor refinements and additions to the generator tieline design and construction plan being finalized by PG&E. They are needed because the previously proposed location of the tower is no longer available for use.
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Organization:	California Energy Commission
Submitter Role:	Commission Staff
Submission Date:	5/9/2016 1:49:58 PM
Docketed Date:	5/9/2016

Generator Tie-Line Tower 2/21 Relocation

Petition to Modify
the
Oakley Generating Station
Oakley, California
(09-AFC-4C)

Submitted to the

California Energy Commission

May 2016

Prepared by

CCGS LLC

With Technical Assistance by:

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Contents

Figures

Table

SECTION 1

Introduction

1.1 Background

On May 18, 2011, the California Energy Commission (CEC) approved and licensed the Oakley Generating Station (OGS), owned by Contra Costa Generating Station LLC (CCGS LLC). The OGS will be a natural gas fired, combined-cycle electrical generating facility rated at a gross nominal generating capacity of 624 megawatts (MW). The facility is located at 6000 Bridgehead Road in Oakley, on a 21.95-acre parcel that was formerly part of a larger 210-acre parcel owned by E. I. du Pont de Nemours and Company (DuPont). The project site is located at the western city limits of the City of Oakley, adjacent to the eastern city limits of the City of Antioch in Contra Costa County.

The facility will tie into the regional electrical grid at Pacific Gas and Electric Company's (PG&E's) Contra Costa Substation in Antioch, California. Power will be transmitted to the grid through a 230-kV generation tie-line connecting to the substation, located 2.4 miles to the southwest of the OGS. The project will replace the existing 60-kV line, located within an existing 80-foot-wide PG&E easement, with a 230-kV line. Construction of the project commenced in June of 2011.

1.2 Description of Proposed Modification

The purpose of this filing is to request the CEC's approval for a minor modification of the OGS project's generator tie-line configuration. CCGS LLC is also working with the East Contra Costa County Habitat Conservancy to amend the project description to reflect this change in the agreement for coverage of the OGS under the East Contra Costa County Habitat Conservation Plan/Natural Communities Conservation Plan (HCP/NCCP).

The requested modification is a minor change in the location of generator tie-line conductor support tower 2/21 and a corresponding minor modification to the generator tie-line alignment between tower 2/21 and tower 2/22. There are corresponding minor changes in the locations and shapes of the pull and work area sites that are located outside of the generator tie-line right-of-way and result in both deletions and additions of work areas. These changes result from minor refinements and additions to the generator tie-line design and construction plan being finalized by PG&E. They are needed because the previously proposed location of the tower is no longer available for use.

1.3 Necessity of Proposed Changes

Sections 1769 (a)(1)(A), (B), and (C) of the CEC Siting Regulations require a discussion of the necessity for the proposed revisions to the OGS project and whether the revisions are based on information known by the petitioner during the certification proceeding. The proposed change was not known by the Applicant until after certification and is necessary to facilitate construction and reduce costs associated with construction of the new facilities, as described in further detail in Section 2.

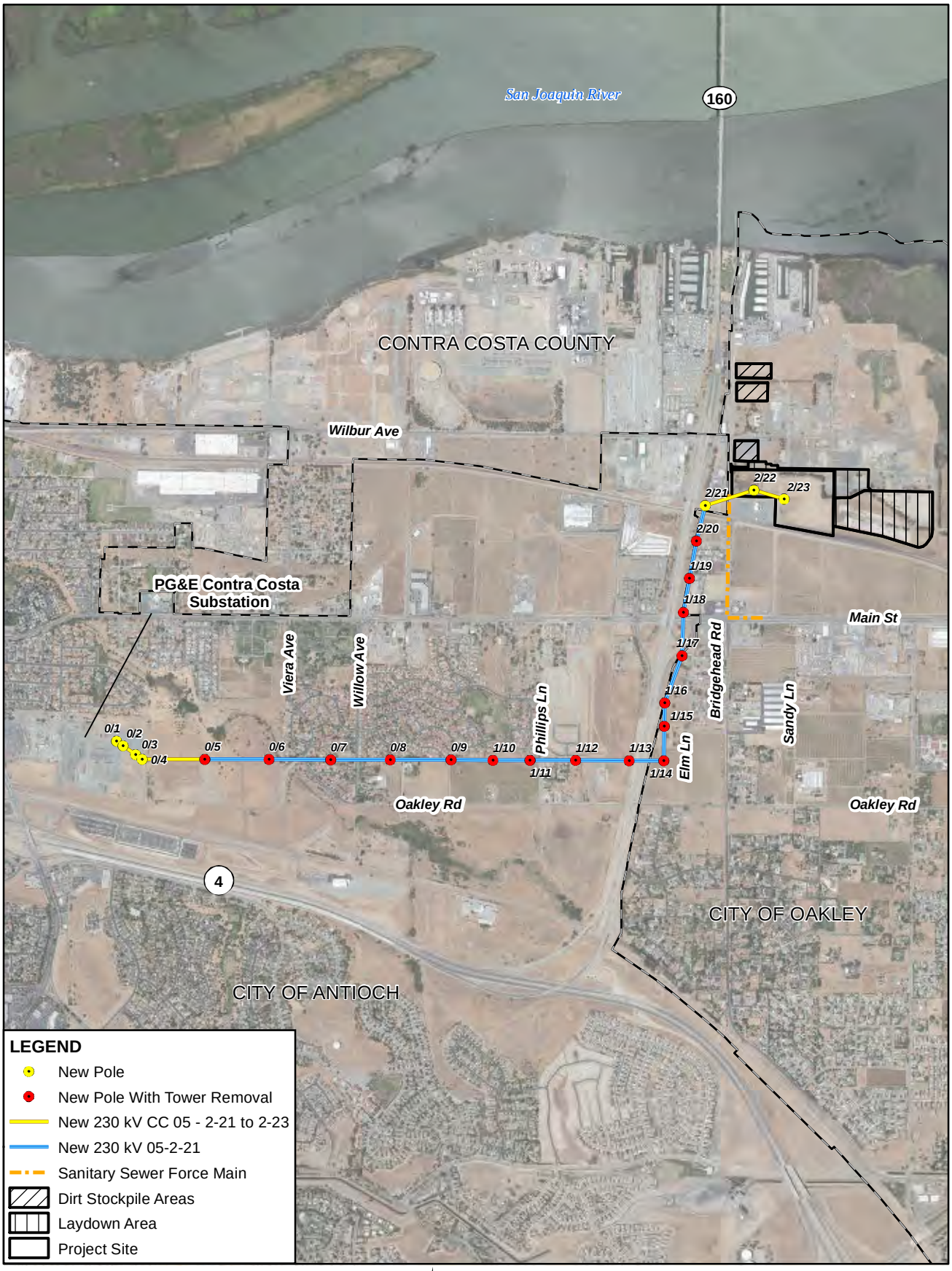
1.4 Summary of Environmental Impacts

Section 1769 (a)(1)(E) of the CEC Siting Regulations requires that an analysis be conducted to address impacts the proposed revisions may have on the environment and proposed measures to mitigate significant adverse impacts. Section 1769 (a)(1)(F) requires a discussion of the impacts of proposed

revisions on the facility's ability to comply with applicable laws, ordinances, regulations, and standards (LORS). Section 3 discusses the potential impacts of the proposed changes on the environment, as well as the proposed revisions' consistency with LORS.

1.5 Consistency of Changes with License

Section 1769 (a)(1)(D) of the CEC Siting Regulations requires a discussion of the consistency of each proposed project revision with the assumptions, rationale, findings, or other bases of the Final Decision and whether the revision is based on new information that changes or undermines the bases of the final decision. Also required is an explanation of why the changes should be permitted. As set forth in the following sections, the proposed revisions do not undermine the assumptions, rationale, findings, or other basis of the Final Decision for the project.



This map was compiled from various scale source data and maps and is intended for use as only an approximate representation of actual locations.

N

0 1,000 2,000

Feet

Figure 1
Transmission Tower Locations

Oakley Generating Station

Oakley, California

CH2MHILL

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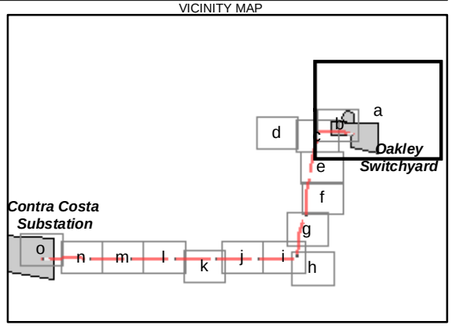
VICINITY MAP



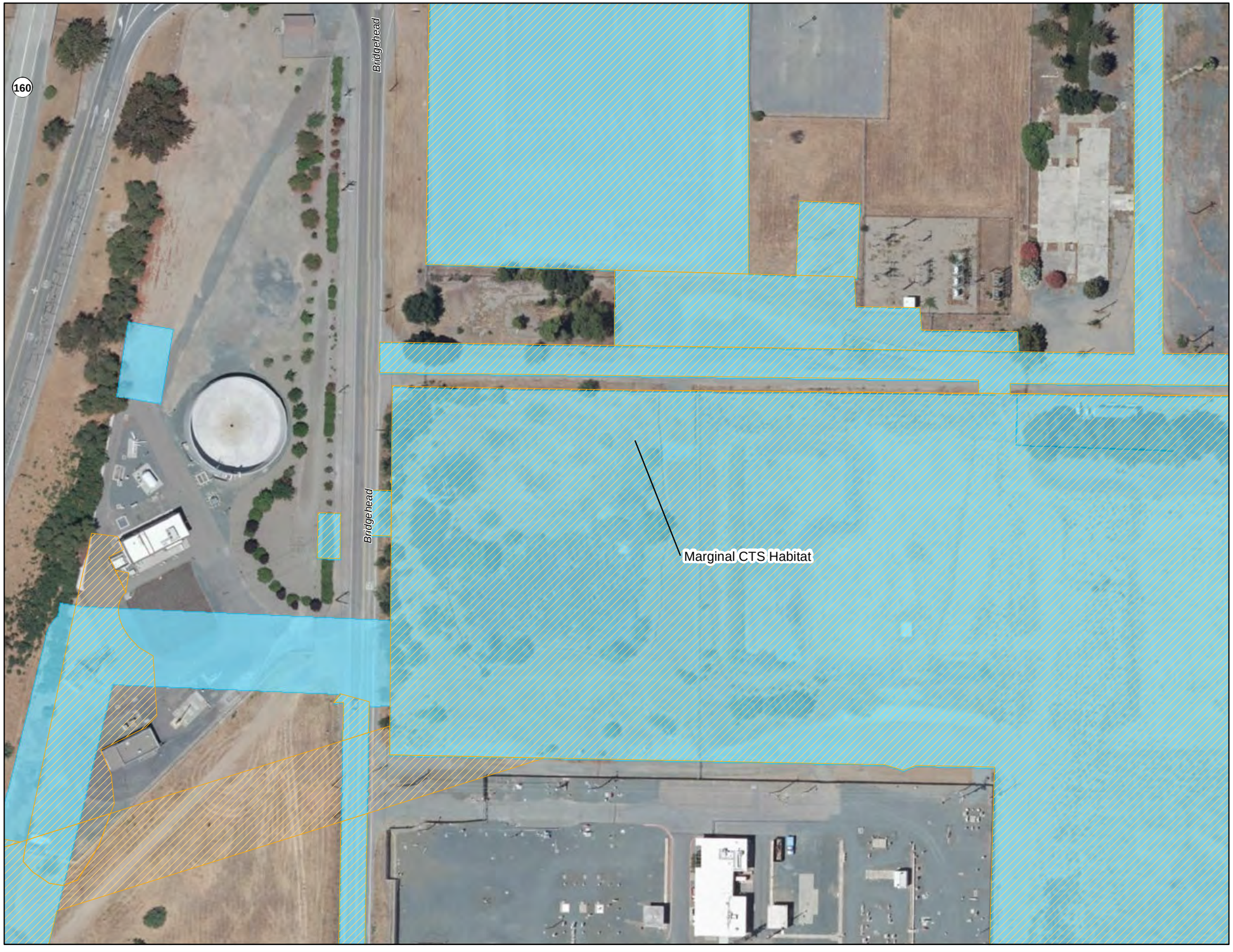
LEGEND

- Proposed Modification
- Existing Project

0 290 Feet

N

Figure 2a
Comparison of Existing and Proposed Facilities
Oakley Generating Station
Oakley, California



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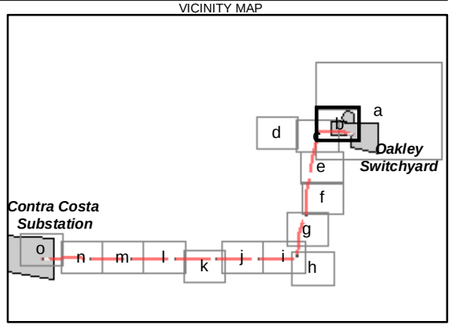


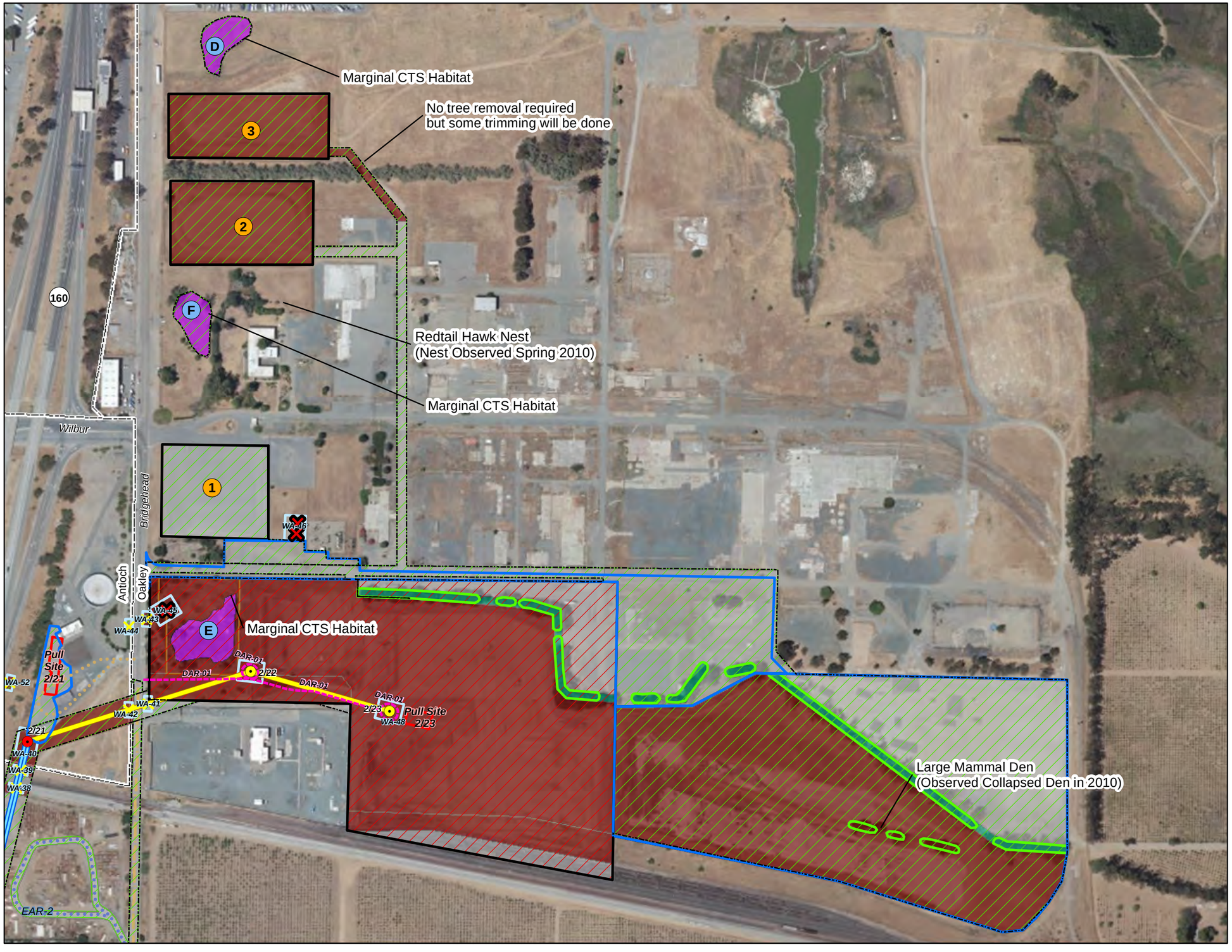
LEGEND

- Proposed Modification
- Existing Project

0 100 Feet

N

Figure 2b
Comparison of Existing and Proposed Facilities
Oakley Generating Station
Oakley, California



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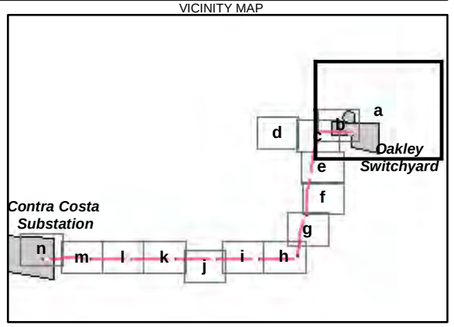


LEGEND

October 2013 Data

- New Pole
- New Pole With Tower Removal
- Existing Pole
- Crossing Structures Flagger
- Crossing Structures Invasive
- Crossing Structures Non-Invasive
- Demo Structure
- New Dirt Access Road
- Structure Work Areas
- Pull Site
- StagingArea
- New 230 kV CC 05 - 2-21 to 2-23
- New 230 kV 05-2-21

Land Cover Habitat Survey

- Non-native Woodland
- Ruderal
- Urban
- Vineyard
- Wetland
- Sanitary Sewer Force Main
- Existing Paved Access Road
- Existing Dirt Access Road
- ESA Fencing
- Wetland E Conservation Easement
- Project Site
- City Limits
- Soil Stockpile Area
- Wetland Area

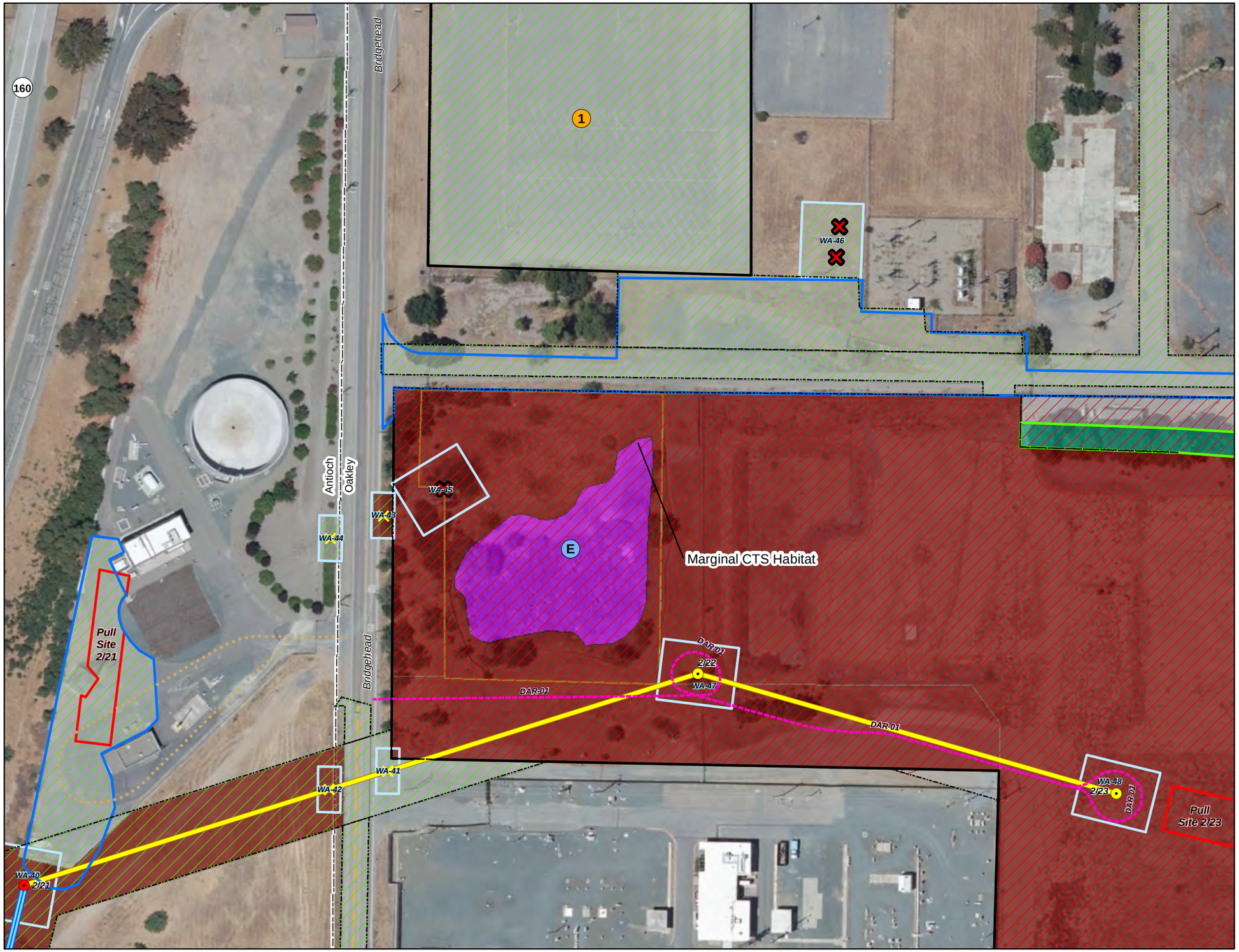
Impact

- Permanent
- Temporary

0 290 Feet

N

Figure 3-a, Rev 3
Land Cover Habitat Survey
Oakley Generating Station
Eastern Contra Costa County Habitat Conservation Plan
Oakley, California



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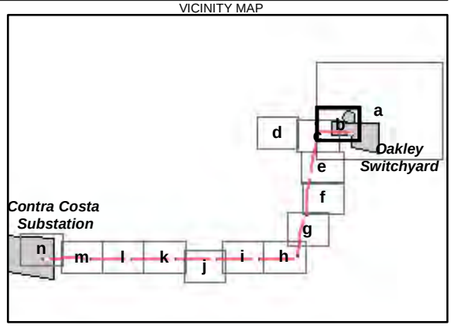

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Impact

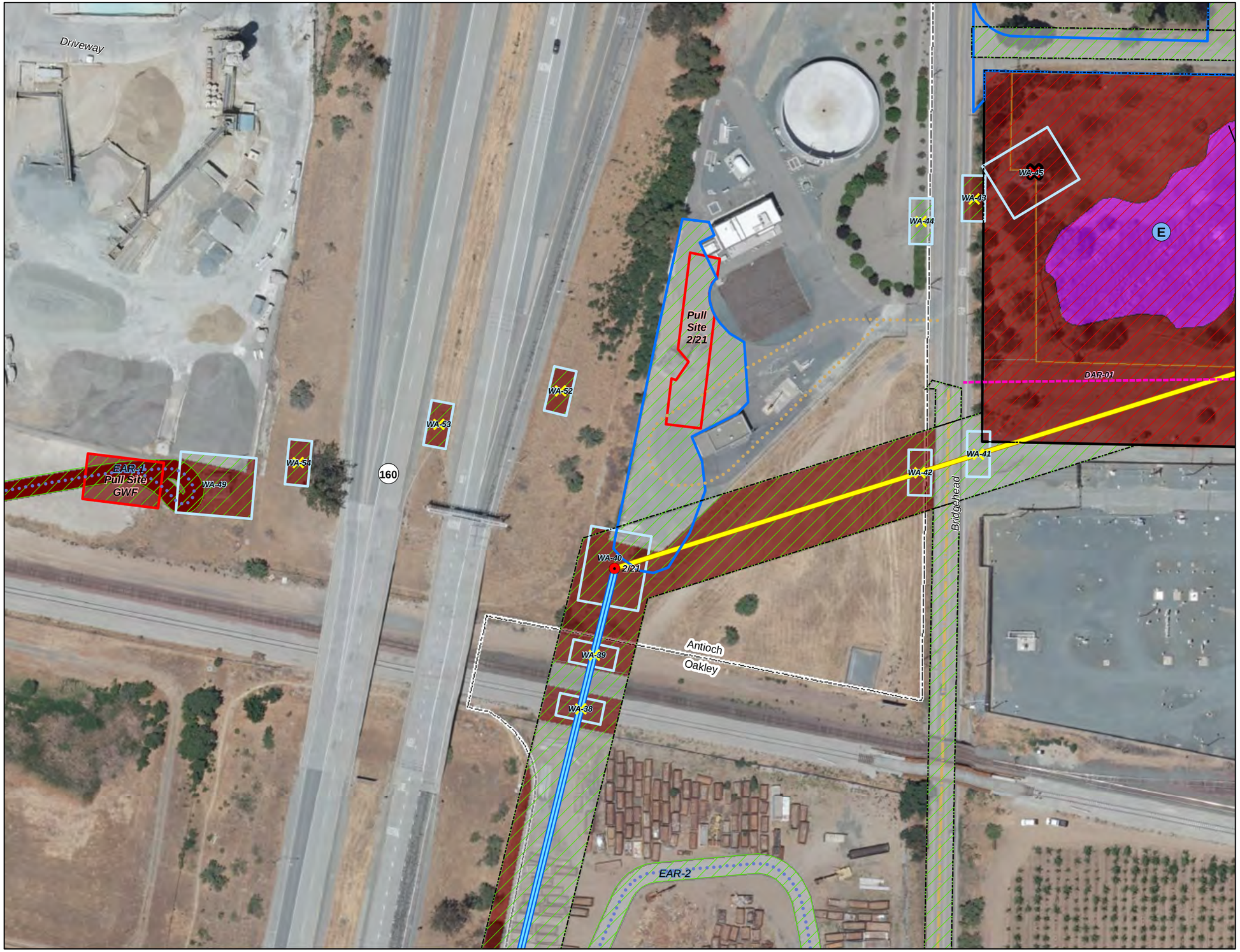
- Permanent
- Temporary

0 90 Feet

N

Figure 3-b, Rev 3
Land Cover Habitat Survey
Oakley Generating Station

Eastern Contra Costa County Habitat Conservation Plan
Oakley, California



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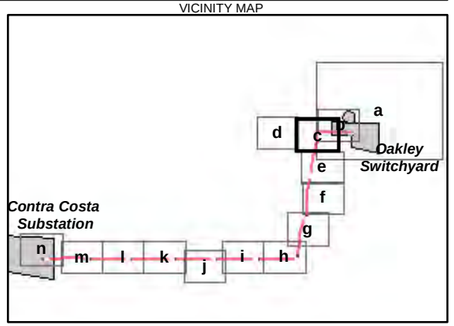

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Land Cover Habitat Survey

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- Wetland E Conservation Easement
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- Wetland Area

Impact

- Permanent
- Temporary

0 90 Feet N

Figure 3-c, Rev 3
Land Cover Habitat Survey
Oakley Generating Station

Eastern Contra Costa County Habitat Conservation Plan
Oakley, California

SECTION 2

Description of the Modification

Under the existing design, the generator tie-line leaves the OGS project site at Tower 2/22 and extends due west across Bridgehead Road to Tower 2/21, where the existing steel lattice tower would be replaced by a steel tubular tower and the line would turn south. Since the OGS was licensed, however, cell phone transponder equipment has been installed on the steel lattice tower, making it unavailable as an OGS generator tie-line tower site. Tower 2/21 will therefore be moved to the south approximately 225 feet within the same right-of-way, to a location just north of the railroad right-of-way. The associated pull sites and work areas outside of the right-of-way will be modified to match the new tower location. Table 1 shows project acreages under the current design for elements affected by the modification, the proposed new acreages under the modification for these elements, and the net change in project acreages of the modifications, taking into consideration both the increases and decreases in project element acreages that result from the proposed modification.

Table 1. Net Acreage Changes Resulting from Proposed Modifications

Project Element	Permanent Disturbance (Acres)	Temporary Disturbance (Acres)	Paved/Urban /Exempt (Acres)	Total
Acreages under Existing Design:				
T-Line ROW Modification/Addition	0	18.72	4.80	23.50
T-Line Pull Sites Outside T-Line ROW	0	0.44	0.11	0.55
Structure Work Areas Outside T-Line ROW	0	0.76	0.47	1.23
Subtotal	0	1.20	0.58	1.78
Acreages with This Proposed Modification:				
T-Line ROW Modifications/Additions	0	18.96	4.29	23.23
T-Line Pull Sites Outside T-Line ROW	0	0.44	0.02	0.46
Structure Work Areas Outside T-Line ROW	0	0.76	0.96	1.72
Subtotal	0	1.44	0.47	1.91
Net Changes in Acreages with Proposed Modifications:				
T-Line ROW Modifications/Additions	0	0.24	-0.51	-0.27
T-Line Pull Sites Outside T-Line ROW	0	0	-0.09	-0.09
Structure Work Areas Outside T-Line ROW	0	0	0.49	0.49
Total Net Changes	**0**	**0.24**	**-0.11**	**0.13**

Figure 1 shows the modification in the context of the project site and entire generator tie-line. Figure 2 compares the new and old configurations. Figure 3 shows the habitat classifications of the newly configured area.

SECTION 3

Environmental Analysis

An analysis of each of the environmental topics included in the Application for Certification (AFC) is presented below. Additionally, the applicable LORS contained in the AFC have been reviewed to confirm consistency with applicable LORS.

3.1 Topics Unaffected by the Additional Laydown area

Most of the subjects considered have little or no potential to be affected by the additional laydown area. These unaffected subjects include Air Quality, Geologic Resources and Hazards, Hazardous Materials Management, Land Use, Noise and Vibration, Public Health, Socioeconomics, Soils, Water Resources; Waste Management, and Worker Safety and Fire Protection.

3.2 Biological Resources

The effects of the modification on biological resources have been taken into consideration through a request for an addendum to the East Contra Costa County Habitat Conservation Plan (ECCCHCP) Participating Special Entity Planning Survey Report. This addendum includes a detailed analysis of the changes to the affected habitat acreages that would result from the modification. A copy of the approved Addendum will be provided to the CEC Staff after final approval by the East Contra Costa County Conservancy.

As shown previously Table 1 (previous section), there will be a net reduction in generator tie-line right-of-way and pull-site area acreages and a net increase in structure work areas outside of the right-of-way. Because there is a net increase in temporary disturbance of habitat (unpaved) areas, the ECCCHCP requires a minor increase in mitigation/habitat replacement fees due of $1,473.17.

Designated OGS biologist Richard Crowe has conducted a field visit to the site of the modifications to conduct habitat mapping of areas not previously part of the project and has determined that sensitive biological resources are not located in these areas. In addition, new elements associated with this modification do not introduce new species or impacts. There are no newly designated special status species in the region that are known to occur within or near the project boundary.

3.3 Cultural Resources

Ground disturbance associated with the modifications will take place only at the new tower location and within the pull site and work areas that are not currently paved. The new work areas, however, are entirely within the areas previously surveyed for cultural resources for the AFC as areas within the generator tie-line right-of-way. Most of these areas are currently paved, in addition (see Figures 2 and 3).

3.4 Paleontology

The modifications will not result in potential impacts greater than those analyzed in the AFC and will comply with applicable LORS. Because mitigation measures proposed in the AFC will be employed, any potential paleontological resource impacts will be less than significant given application of those mitigation measures. The new tower and work area locations are within the areas subjected to paleontological field reconnaissance within the existing generator tie-line right-of-way.

3.5 Visual Resources

The modifications will result in a minor change in the project's appearance but will not result in visual impacts. Tubular steel tower 2/21 will be in a location 225 feet south from the previously proposed location. This tower will not block or significantly change views from sensitive receptor locations and would not be visible from the nearest Key Observation Points (KOPs 1 and 2).

In addition, 17 existing steel lattice towers will be removed and replaced with more aesthetic tubular steel towers as part of this project (Figure 1). With these modifications, the number of tower replacements would be reduced by 1 to 16. This does not make a significant difference in terms of visual resources.

SECTION 4

Potential Effects on the Public and Property Owners

The proposed change described in this amendment will have no effect on the public and property owners beyond what was originally approved by the CEC[1].

The generator tie-line modifications will result in no greater impacts on the public and property owners than those analyzed during project licensing. Therefore, impacts on the public and property owners are expected to be the same than those analyzed during the license proceeding for the project. In addition, the existing site is located on property owned by the Delta-Diablo Sanitation District; the newly proposed tower location is on PG&E property.

[1] CEC Siting Regulations Section 1769(a)(1)(G) and (I)