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October 28, 2014

Eric Veerkamp
California Energy Commission
1516 Ninth Street, MS-2000
Sacramento, CA 95814

Re: Petition to Amend The Commission Decision For Genesis Solar Energy Center,
   Docket No. 09-AFC-8.

Dear Mr. Veerkamp,

Pursuant to Section 1769 of the California Energy Commission (CEC) Siting Regulations, NextEra Energy Resources hereby submits the attached Petition for a Staff Approved Project Change to Amend the Genesis Solar Energy Facility Docket No. 09-AFC-8. The requested changes do not affect the project description or any Conditions of Certification in the Commission Decision or subsequent amendments.

The petition is to allow the Genesis Solar Energy Facility to store a spare three-phase 25 MVA Auxiliary Transformer within the facility. The purpose of the proposed spare transformer is to minimize the outage period needed for replacement due to emergency failure of the on-line unit.

We have reviewed the Commission Decision (Docket No. 09-AFC-8), and we believe that the request is an insignificant project change and will not result in any new environmental impacts or require any modification to the existing Conditions of Certification contained in the Final Decision.

Thank you for your attention, and please feel free to call me at (561) 691-2232 should you have any questions or require any additional information.

Sincerely,

Charlyn M. Mosley
Charlyn Mosley
Senior Environmental Specialist
Genesis Solar Energy Project

cc: L. Goguts – Genesis
    R. Garcia – NEER
GENESIS SOLAR ENERGY FACILITY APPLICATION FOR STAFF APPROVED PROJECT CHANGE

As required by Section 1769 of the CEC Siting Regulations, NextEra Energy Resources (NEER) hereby submits the following information in support of a staff approved project change at the Genesis Solar Energy Facility (Genesis).

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 modifications.

The modification proposes to store one (1) spare three-phase 25 MVA Auxiliary Transformer at the Genesis site, which can be used as a replacement for the on-line unit in case of emergency failure. It will be mounted on a concrete foundation with secondary containment, to capture oil in case of spillage. Low power electrical supply will be provided for heating elements inside the control cabinet to prevent moisture build-up, and also to periodically check cooling fan operation. Attached are the spare foundation plans which include a Site Plan, transformer nameplate which provides product specifications, and the transformer outline. Genesis will use Bureau Veritas as the Chief Building Official (CBO) for the project.

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.

After review of the spare equipment strategy for Genesis, NEER recently determined that the Auxiliary Transformer is critical in maintaining the system's heat transfer fluid (HTS), and the Plant cannot operate without it. Should surprise failure occur, having the Spare Auxiliary Transformer would enable Genesis to quickly replace the unit within approximately one week and restore power. Without it, replacement would take approximately 6 months.

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 modification is based on recent review of the NEER spare equipment strategy. The installation of a Spare Auxiliary Transformer is a reliability measure that minimizes outage time needed for replacement of the on-line unit in the event of a surprise failure.

Pursuant to Section 17699(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.

The storage of the spare auxiliary transformer will have no significant adverse impacts on the environment. The spare transformer will use non-PCB insulating oil and the foundation will be provided with secondary containment to adequately capture any potential oil spillage. The facilities Spill Prevention, Containment and Countermeasure (SPCC) plan, Stormwater Pollution Prevention Plan (SWPPP), and Hazardous Materials Business Plan (HMBP) will be modified to capture the additional oil and controls resulting from the new spare auxiliary transformer. The spare transformer will use non-PCB insulating oil meeting.

Pursuant to Section 17699(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.
The proposed modification will not have an impact on the facility’s ability to comply with applicable laws, ordinances, regulations and standards.

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

The proposed upgrade will have no significant environmental effects and will be in compliance with applicable LORS, therefore there will be no effects to the public.

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

The proposed upgrade will have no significant environmental effects and will be in compliance with applicable LORS, therefore there will be no effects to the property owners.

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

The proposed upgrade will have no significant environmental effects and will be in compliance with applicable LORS, therefore there will be no effects to the property owners, the public or other properties.
GENERAL NOTES

SPECIAL TRANSFORMER SITE PREPARATION

GENESIS SOLAR SGN-7209

TECHNICAL SUPPORT

DRAWN BY: CC
DATE: 06/01/19
SCALE: 1/15
JOB NO.: 605-0714
SHEET: S-1
OF: 1

NOTE: ALL NOTES IN THIS SHEET SHALL APPLY TO EACH SHEET OF THE SET OF STRUCTURAL DRAWINGS.