

**Pacific Gas and
Electric Company**
Power Generation
Fossil Plant Construction

Gateway Generating Station
3225 Wilbur Ave.
Antioch, CA 94509
(925) 459-7200

February 4, 2008
GGS-L-00046C

GGS Compliance Log # 2008-003

Mr. Ron Yasny
California Energy Commission
1516 Ninth Street, MS-2000
Sacramento, CA 95814

DOCKET	
00-AFC-1C	
DATE	FEB 04 2008
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**Subject: Gateway Generating Station (Docket 00-AFC-1C)
Request for Insignificant Project Change**

Dear Mr. Yasny:

Enclosed is an original and 12 copies of Pacific Gas & Electric Company's request for an insignificant project change related to a proposed modification to the Gateway Generating Station Project's sewer line.

If you have any questions regarding this request, please contact me at (916) 780-1171.

Sincerely,

Andrea E. Grenier

Enclosure
AEG/aeg

cc: Tom Allen, GGS Project Manager
Scott Galati, Galati & Blek LLP
GGS Document Control

**Request for Insignificant Project Change to the
Gateway Generating Station Project
Sanitary Sewer Line Alignment**

Submitted to the
California Energy Commission

February 4, 2008

Submitted by
Pacific Gas and Electric Company

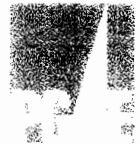


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1.0 Introduction

Pacific Gas and Electric Company (PG&E) is currently constructing the Gateway Generating Station Project in Antioch, California. Construction activities have been ongoing since early 2007 and significant progress has been made to date, not only on the components of the project that were originally approved by the California Energy Commission in 2001 (when the project was still under the ownership of Mirant Delta LLC), but also on the dry cooling system that was approved by the CEC in August 2007. Work on the project's linear features (a sanitary sewer line and water supply line, which were also approved as part of PG&E's dry cooling amendment) will begin soon. The purpose of this filing is to request a minor revision to the sanitary sewer line route to accommodate changes requested by the City of Antioch.

1.1 Background

The Gateway Generating Station Project is a nominal 530 MW combined cycle power plant located at 3225 Wilbur Avenue in the City of Antioch. The project, originally developed by Mirant Delta LLC as Contra Costa Power Plant Unit #8 (CC8), was certified by the California Energy Commission on May 30, 2001. Construction began in late 2001 but was suspended by Mirant in February 2002. In late 2006, Pacific Gas and Electric Company (PG&E) acquired the project through an Asset Transfer Agreement and renamed it the Gateway Generating Station (GGS). The CEC Compliance Project Manager issued a letter on January 19, 2007 authorizing PG&E to restart construction of the project. Construction activities on the power block were initiated soon thereafter, and work on the air cooled condenser system was begun during the summer of 2007. PG&E will be initiating work on the construction of the water supply and sewer pipelines soon. Commercial operation is targeted for February 2009.

1.2 Description of Proposed Modification

Wastewater from the Gateway project will be discharged to Delta Diablo Sanitation District's (DDSD) lift station located on Bridgehead Road via a new 3,000-foot long sewer pipeline. The new pipeline and route were described in PG&E's Dry Cooling Amendment, which the CEC approved in 2007. Since that time, the City of Antioch has requested that the last leg of the sewer line be modified. More information on the revised route is contained in Section 2.0.

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 GGS project and whether the revisions are based on information known by the petitioner during the certification proceeding. The necessity for each revision is addressed in Section 2. These changes are necessary to reflect the City of Antioch's request to modify the alignment of the sewer line.

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 3.0 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. None of the proposed revisions undermines the assumptions, rationale, findings, or other basis of the Commission Decision for the project.

2.0 Description of Project Changes

Consistent with the California Energy Commission Siting Regulations Section 1769(a) (1) (A), this section includes a description of the requested project modification, as well as the necessity for the changes.

2.1 Proposed Project Changes

Wastewater from the Gateway project will be discharged to Delta Diablo Sanitation District's (DDSD) lift station located on Bridgehead Road via a new 3,000-foot long gravity sewer pipeline. The new sewer line and route were described in PG&E's Dry Cooling Amendment, which the CEC approved in 2007. That route was as follows:

- ♦ The new sewer line exits from the southern project fence line of the GGS site into Wilbur Avenue, where it turns east following the centerline of the road.
- ♦ The route proceeds east along Wilbur Avenue for approximately 2,000 feet, passing under State Route 160, to Bridgehead Road.
- ♦ At Bridgehead Road, the sewer line turns south for approximately 750 feet before turning southwest into the DDSD lift station.

The alignment described above would be located in the jurisdiction of both the City of Antioch and the City of Oakley. PG&E has been working on the design of the new line for the past six months and was ready to move forward with soliciting bids for construction. However, the City of Antioch has notified PG&E that because the City of Antioch will ultimately own the new sewer line, the City prefers that the originally proposed route alignment be modified to avoid placement of the line in the City of Oakley's jurisdiction. This request has required a redesign of

the eastern most section of the line and negotiations with DDS D to place the line along the western edge of their property. PG&E's pipeline design engineer, Trident Engineering, has redesigned the last leg and has negotiated the necessary variances with the City of Antioch and DDS D to make the line work. The new route is as follows:

- ♦ The waste discharge pipeline will exit from the southern project fence line of the GGS site into Wilbur Avenue and turn east following the original alignment along the centerline of the existing roadway.
- ♦ The route will proceed east along Wilbur Avenue, pass under State Route 160, and continue to a point located approximately where the Highway 160 off ramp drops onto Wilbur Avenue.
- ♦ At this point, the pipeline turns south to parallel the western property line of the DDS D-owned parcel for approximately 400 feet. The line makes a jog around the control building and then connects directly into the existing DDS D lift station located on this parcel.

The revised pipeline route, as compared to the original route approved by the CEC in 2007, is shown in Figure 1.

2.2 Necessity of Proposed Change

Sections 1769 (a)(1)(B) and 1769(a)(1)(C) of the CEC Siting Regulations require a discussion of the necessity for the proposed changes to the project and whether this modification is based on information that was known by the petitioner during the certification proceeding. During the preparation of the dry cooling amendment, in which the new waste discharge line was first described, PG&E was unaware that the City of Antioch would subsequently request changes to the proposed linear route. The proposed change described herein will allow PG&E to meet the requirements set forth by the City of Antioch so that construction of the waste discharge line can proceed as scheduled.

3.0 Environmental Analysis of the Project Changes

PG&E has reviewed the modifications to the sewer line alignment to determine if the new leg will result in any environmental impacts that were not originally analyzed by the CEC when it approved the new line and route in 2007. The following disciplines will not be affected by the changes in this amendment and are not addressed: air quality, public health, land use, worker health and safety, noise, soils and water resources, waste management, hazardous materials management, geologic hazards and paleontological resources, and visual resources. Disciplines that have the potential for environmental effects, different from those addressed in the CEC's approval of PG&E's dry cooling amendment, are analyzed below.



Figure 1.

3.1 Biological Resources

PG&E's project biologist performed a reconnaissance survey of the modified portion of the waste discharge pipeline alignment on November 5, 2007. The new alignment will be located on DDSD property that has been undergoing significant construction work related to DDSD's addition of a new water tank and buildings. The area in which the pipeline will be constructed has been used by DDSD as a construction laydown area for its own construction activities and has been significantly disturbed (see Figure 2).



Figure 2.

The new pipeline will be constructed in this disturbed area along the western edge of the DDSD property (see red alignment marker on Figure 2). As can be seen in Figure 2, there are some trees and shrubs (Peruvian Pepper tree, Tree 'O' Heaven, Eucalyptus, and a few small coast live oaks) located just outside the DDSD western fence/property line in the Caltrans right-of-way associated with the Wilbur Avenue off ramp from Highway 160. The site was also surveyed for valley elderberry shrubs but none were found. Construction of the new pipeline will be located far enough away from the existing vegetation so as to not affect the area and will parallel underground utilities that already exist in the area. Therefore, no impacts to biological resources are expected to occur from the pipeline realignment.

3.2 Cultural Resources

As mentioned under Biological Resources, the proposed area for the modified pipeline alignment has been significantly disturbed as a result of recent construction activities by DDSD on the

parcel. Phil Reid, a cultural resources monitor for the GGS project, conducted a cultural resources survey of the area in November 2007 and did not observe any artifacts, other cultural resources, anthropogenic soils (midden) or historic features visible on any portion of the ground surface at the site. Other underground utilities are present in this area and significant disturbance has already occurred. The area near the vegetated areas was also surveyed, but this area was previously disturbed during construction of the Wilbur Avenue off ramp. Construction of the sewer line in this area is not likely to result in any cultural resource impacts. However, the cultural resources monitor will be onsite during the construction of the sewer line, as required by the approved Cultural Resources Implementation & Monitoring Plan.

3.3 Traffic and Transportation

In approving the new sewer line as part of PG&E's dry cooling amendment, CEC Staff did not identify any new impacts to traffic and transportation related to the new pipeline. By moving the pipeline route "off" a portion of Wilbur Avenue and off of Bridgehead Road completely, potential traffic impacts will be significantly reduced, as construction activities will be avoided in these sections of public road right of way.

3.4 Cumulative Impacts

No new significant cumulative impacts are expected from the proposed changes relative to those presented in the CEC Final Decision. These changes will not alter the assumptions or conclusions made in the Commission Decision for the CC8 project.

3.5 LORS

The proposed revisions will not change the discussion related to LORS as presented in the CEC Final Decision. PG&E has been working closely with the City of Antioch and DDS to ensure that the revised alignment complies with all applicable LORS. Any required permits or other administrative approvals will be documented in the project's Monthly Compliance Report.

4.0 Proposed Modifications to the Conditions of Certification

The proposed modification to the alignment of the sewer line will not require any changes to the Conditions of Certification for the GGS project, either as originally approved in the 2001 Final Decision or the CEC's approval of the PG&E dry cooling amendment.

5.0 Potential Effects on the Public

The proposed change to the sewer line route will have no effect on the public beyond what was originally approved by the CEC. As mentioned in Section 3.3, traffic impacts should be significantly reduced due to the fact the new alignment will eliminate the need for construction activities in portions of Wilbur Avenue and Bridgehead Road.

6.0 Request for Processing as an Insignificant Project Change

The modification to the sewer line as described herein will not result in any additional impacts that are not already described in the GGS Final Decision, nor will any Conditions of Certification need to be modified or added as a result of the requested change. Therefore, PG&E respectfully requests that the CEC Compliance Project Manager process and approve this request as an Insignificant Project Change as quickly as possible so that construction can continue as planned.