

**PETITION FOR CHANGE OF THE PROJECT DESCRIPTION IN THE FINAL
DECISION TO EXPAND AN EXISTING SWITCH GEAR ENCLOSURE AT
PALOMAR ENERGY CENTER
(O1-AFC-24C)**

DOCKET	
01-AFC-24C	
DATE	<u>NOV 15 2011</u>
RECD.	<u>NOV 15 2011</u>

By:

**SAN DIEGO GAS & ELECTRIC COMPANY
SAN DIEGO, CALIFORNIA**

Submitted to:

CALIFORNIA ENERGY COMMISSION

November 15, 2011

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1.0 INTRODUCTION

San Diego Gas & Electric Company (SDG&E) is filing this petition for a proposed amendment of the project design as described in the Final Decision for the Palomar Energy Center (PEC), Docket 01-AFC-24 pursuant to 20 Cal. Code Regs. Section 1769(a)(1). San Diego Gas & Electric (SDG&E or "the applicant") is proposing to expand the 36'X14' existing switch gear enclosure to provide safe access to the switch gear and motor control center for maintenance and repair. The current enclosure houses the central electric distribution hub for the cooling tower complex and is critical to the daily operations of the plant. No changes in Conditions of Certification are necessary.

2.0 DESCRIPTION OF PROPOSED MODIFICATION (Sec. 1769(a)(1)(A))

Further details of the proposed facilities are as follows:

Cooling Tower Switch Gear Structure Improvement. SDG&E is proposing to add two 6'X22' expansions (one on each side of the building) to the existing switch gear enclosure. The expansion will improve lighting, improve access and location of electrical outlets, and improve access to equipment housed in the enclosure. The expansion will also be fitted with a 12'X8' roll-up door and a man door for accessibility to the housed equipment. The addition of the usable work space will ensure a safe working environment when performing maintenance, repairs, and/or inspections of the equipment. The outer surfaces of the building will be painted the plant color (SW 1022 Cubist grey). Plot plans showing the location of the building and visual simulations are attached in Appendix 1.

3.0 NECESSITY (Sec. 1769(a)(1)(B))

The expansion of the switch gear building will improve facility reliability, efficiency, and convenience to access equipment housed in the structure.

4.0 TIMING (Sec. 1769(a)(1)(C) and (D))

SDG&E assumed ownership of the PEC about three years after issuance of the Final Decision and certification to Palomar Energy, LLC. Since taking ownership of the plant in 2006, SDG&E has continued to review the engineering and design of the plant in order to better serve the needs of SDG&E ratepayers. SDG&E has also benefited from experience gained operating the plant since assuming ownership. This “fine tuning” could not have taken place during the licensing proceeding because SDG&E was not the applicant, the plant was not yet operating, and Palomar Energy brought its own objectives to the development of the project for the merchant market. The addition of this expansion does not change or undermine the assumptions, rationale, findings, or other bases of the Final Decision. The change complies with all laws, ordinances, regulations and standards and does not have a significant environmental impact, as further described below.

5.0 ANALYSIS OF THE EFFECT OF THE MODIFICATIONS ON THE ENVIRONMENT (Sec. 1769(a)(1)(E))

The requested equipment change will have no significant effects on any of the technical areas analyzed in the August 2003 Final Commission Decision. Please see Table 1 below.

Table 1
Review of Effects of Installation and Operation of Emergency Engine

TECHNICAL AREA	SIGNIFICANT ENVIRONMENTAL IMPACT (Y/N)?		NOTES
AIR QUALITY		N	no change
CULTURAL RESOURCES		N	Area for construction is prior filled area
EFFICIENCY		N	No impact
GEOLOGICAL HAZARDS		N	No change
HAZARDOUS MATERIALS HANDLING		N	No change
LAND USE		N	No change
NOISE		N	No Change
PALEONTOLOGICAL RESOURCES		N	Area for construction is prior filled area
BIOLOGICAL RESOURCES		N	Area previously disturbed.

TECHNICAL AREA	SIGNIFICANT ENVIRONMENTAL IMPACT (Y/N)?		NOTES
PUBLIC HEALTH		N	no change
RELIABILITY		N	No change
SOCIOECONOMICS		N	No change
SOILS		N	No change
TRAFFIC AND TRANSPORTATION		N	Construction traffic minimal
T-LINE SAFETY AND NUISANCE		N	No change
TRANSMISSION SYSTEM ENGINEERING		N	No change
VISUAL RESOURCES		N	Structures will meet painting and visual requirements of Final Decision; See plot plan and visual simulations in Appendices 1.
WASTE MANAGEMENT		N	No change
WATER RESOURCES		N	No change
WORKER SAFETY		N	No change

6.0 COMPLIANCE WITH LAWS, ORDINANCES, REGULATIONS AND STANDARDS (LORS) (Sec. 1769(a)(1)(F))

The proposed building expansion and improvements will not affect compliance with any other LORS requirement. Therefore, the proposed modification is not anticipated to impact SDG&E's ability to comply with the applicable LORS, as listed in Appendix A of the Commission Final Decision.

7.0 POTENTIAL EFFECTS ON PUBLIC AND NEARBY PROPERTY OWNERS (Sec. 1769(a)(1)(G and I))

The requested expansion will not have any environmental impacts and will comply with all applicable LORS. Thus, the proposed equipment change is not anticipated to affect nearby property owners or parties in the application proceedings or the public

8.0 LIST OF PROPERTY OWNERS (Sec. 1769(a)(1)(H))

A list of property owners 1,000 feet of the plant site has previously been provided to the Commission CPM.

9.0 SUMMARY OF REQUEST

As demonstrated above, construction and use of the expanded building will not have an adverse effect on the public or the environment. The change will not affect compliance with applicable LORS. Accordingly, SDG&E requests that the Energy Commission Staff expedite review of this petition, and request Commission approval of the proposed modified conditions in accordance with Title 20 CCR Section 1769.

Petition for Change of Equipment (Cooling Tower Switch Gear Structure Improvement)
August, 2010
Page 7 of 8

Respectfully Submitted,

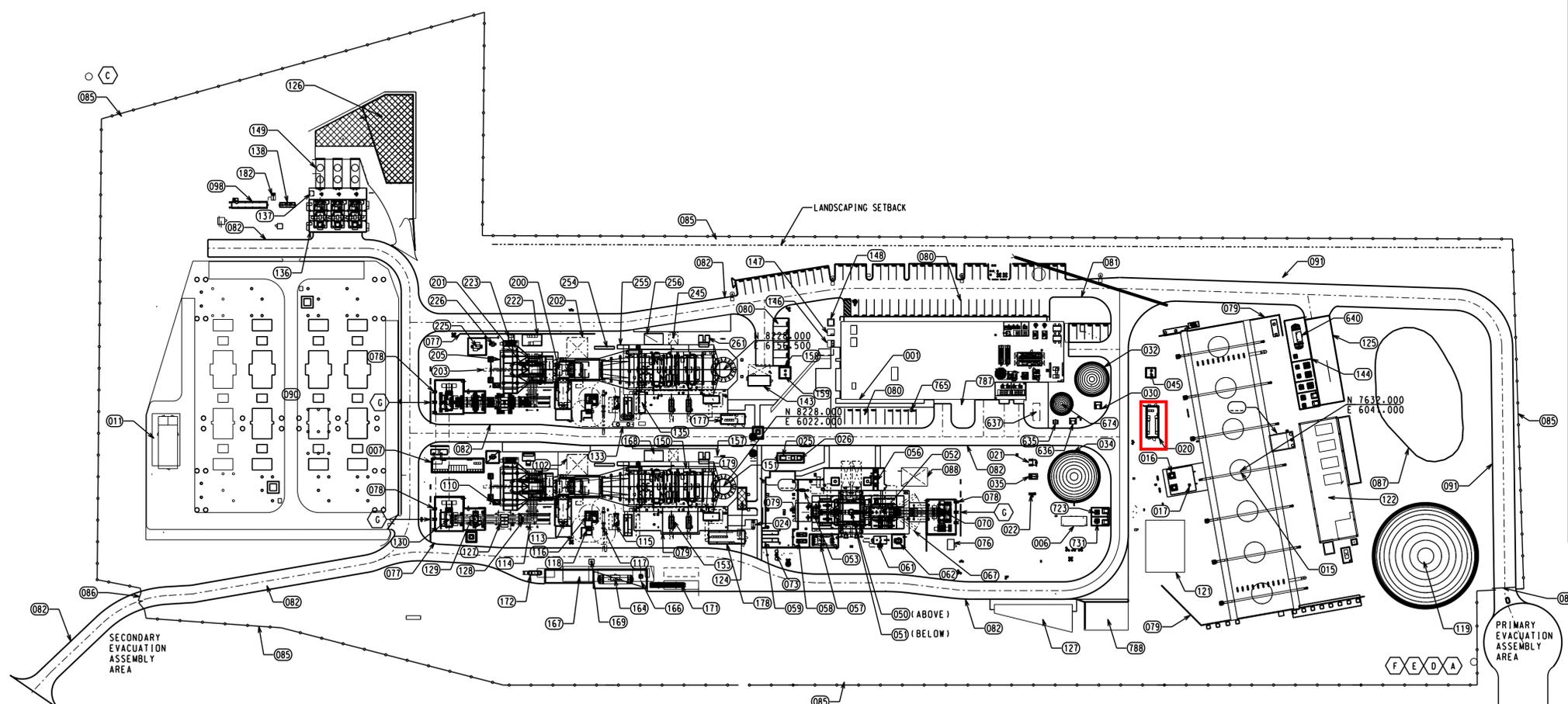
A handwritten signature in black ink, appearing to read "Jason T. Dobbs", written over a horizontal line that extends to the right.

Jason T. Dobbs
Compliance Administrator

Dated: NOVEMBER 15, 2011

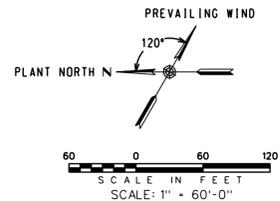
APPENDIX 1

**SITE MAP, FLOOR PLANS, AND VISUAL SIMULATIONS OF PROPOSED
BUILDING EXPANSION**



NO	EQUIPMENT TITLE	NO	EQUIPMENT TITLE
001	ADMINISTRATION BUILDING	127	GENERATOR BREAKER
006	FIRE PUMP MODULE	128	ISO PHASE BUS DUCT
007	SKV MODULE	129	AUXILIARY TRANSFORMER
011	SWITCHYARD CONTROL BUILDING (BY OTHERS)	130	CTG STEP-UP TRANSFORMER
015	COOLING TOWER	133	WATER WASH DRAINS TANK
016	CIRCULATING WATER PUMPS	135	WATER WASH SKID
017	AUXILIARY CIRCULATING WATER PUMP	136	FUEL GAS COMPRESSORS ENCLOSURE
020	COOLING TOWER ELECTRICAL MODULE	137	FUEL GAS COMPRESSOR DRAINS TANK
021	SERVICE WATER PUMP SKID	138	FUEL GAS REGULATING SKID
022	BACKUP CIRCULATING WATER MAKEUP PUMP	143	CYCLE CHEMICAL FEED ENCLOSURE
024	CLOSED COOLING WATER HEAD TANK	144	COOLING TOWER CHEMICAL FEED AREA
025	OIL/WATER SEPARATOR	146	FUTURE EMERGENCY DIESEL GENERATOR (BY OWNER)
026	OIL/WATER SEPARATOR LIFT PUMPS	147	12KV DISTRIBUTION EMERGENCY TRANSFORMER
030	DEMIN WATER PUMP SKID	148	HIGH VOLTAGE DISCONNECT SWITCH FOR 12KV DIST TRANSFORMER (BY OWNER)
032	DEMIN WATER STORAGE TANK	149	AIR COOLED AFTER COOLERS
034	RAW WATER STORAGE TANK	150	HRSG UNIT 1
035	RO SUPPLY PUMP SKID	151	HRSG STACK
045	WASTE WATER COLLECTION AND TRANSFER SUMP	153	BOILER FEEDWATER PUMPS
050	STEAM TURBINE	157	BLOWDOWN TANK
051	SURFACE CONDENSER	158	BLOWDOWN DRAIN SUMP
052	STEAM TURBINE GENERATOR	159	BLOWDOWN DRAIN SUMP PUMPS
053	GLAND STEAM CONDENSER	164	AQUEOUS AMMONIA STORAGE TANK
056	CONDENSATE PUMPS	166	AMMONIA FORWARDING PUMPS
057	STG LUBE OIL MODULE	167	AMMONIA CONTAINMENT AREA
058	CLOSED COOLING WATER PUMPS	168	AMMONIA INJECTION SKID
059	CLOSED COOLING WATER HEAT EXCHANGERS	169	AMMONIA UNLOADING CONTAINMENT AREA
061	STG EXCITATION UNIT EQUIPMENT (GEC)	171	H2 BULK TRAILER STORAGE
062	STG EXCITATION TRANSFORMER	172	CO2 BULK TRAILER STORAGE
067	STG ROTOR REMOVAL AREA	177	HRSG 2 MCC MODULE
070	STG STEP-UP TRANSFORMER	178	HRSG 1/STG MCC MODULE
073	DUPLEX BASKET STRAINER	179	SAMPLE PANEL
076	STEAM TURBINE FIRE PROTECTION VALVE HOUSE	182	FUEL GAS SCRUBBER SKID
077	SOUND BARRIER (OPTIONAL)	200	COMBUSTION TURBINE UNIT 2
078	DEADEND STRUCTURE	201	COMBUSTION TURBINE GENERATOR
079	SOUND BARRIER	202	TURBINE ROTOR REMOVAL AREA
080	PARKING AREA	203	GENERATOR REMOVAL AREA
081	CURB	205	AIR INLET FILTER
082	ROADWAY-20' WIDE	222	UNIT EXCITATION/LCI EQUIPMENT
085	SITE FENCE	223	DC LINK REACTOR
086	GATE	225	GE LCI ISOLATION TRANSFORMER
087	STORM WATER POND	226	EXCITATION TRANSFORMER
088	STG MAINTENANCE AREA	245	SCR REMOVAL AREA
090	PLANT SWITCHYARD (BY OTHERS)	254	DUCT BURNER PRESSURE REDUCING SKID
091	ROADWAY 25' WIDE	255	HRSG DUCT BURNER VALVE SKID
092	TEMPORARY CRANE FOUNDATIONS	256	HRSG2 SCANNER COOLING AIR BLOWER SKID
098	FUEL GAS CHROMATOGRAPH AND METERING ASSEMBLY	261	HRSG FEEDWATER PREHEATER PUMPS
102	TURBINE ROTOR REMOVAL AREA	635	DEMIN RO FEED PUMP SKID
110	AIR PROCESS SKID	636	CTG EVAP COOLER MAKE UP WATER PUMP SKID
113	LUBE OIL/GAS VALVE MODULE (ACCESSORY MODULE)	637	FUTURE MIXED BED
114	PACKAGED ELECTRICAL ELECTRONIC CONTROL CENTER	640	CIRCULATING WATER SULFURIC ACID TANK
115	CO2 FIRE PROTECTION SKID	674	RO PERMEATE STORAGE TANK
116	FUEL GAS KNOCKOUT TANK AND FILTER/SEPARATOR SKID	723	RAW WATER STORAGE SODIUM HYPOCHLORITE PUMP SKID
117	FUEL GAS HEAT EXCHANGER	731	RAW WATER STORAGE SODIUM BROMIDE PUMP SKID
118	FUEL GAS STARTUP HEATER	765	SANITARY SUMP PUMP
119	TES TANK	---	---
---	SUMP	---	---
121	PUMP LAYDOWN	---	---
122	CHILLER BUILDING	---	---
---	METAL CANOPY	---	---
124	LUBE OIL AND GREASE STORAGE	787	MANLIFT PARKING
125	UNLOADING RAMP	788	HAZARDOUS MATERIAL STORAGE
126	SPECIAL EQUIP. STORAGE & CANOPY COVER	---	HAZARDOUS
127	TOOL STORAGE BUILDING	790	METAL CANOPY

- TIE-IN LOCATIONS
- (A) POTABLE WATER TIE-IN
 - (C) FUEL GAS TIE-IN
 - (D) RECLAIM WATER AND FIRE PROTECTION TIE-IN
 - (E) SANITARY SEWER
 - (F) BRINE RETURN
 - (G) EPC/SWITCHYARD CONTRACT 230KV CABLE INTERFACE POINT



REV	APP	DATE
4	BJM	11-30-09
3	GM TL	05-27-09
2	RLM MAL SJL	08-24-06
1	DNL MAL SJL	05-22-06
0	PAA PDW SJL	03-14-05

SAN DIEGO GAS & ELECTRIC

PALOMAR ENERGY CENTER
ESCONDIDO, CALIFORNIA

PLOT PLAN

DESIGNED	DATE	DRAWING NUMBER
by PAA	02-02-04	2004-005-PP-001
DRAWN PAA	02-02-04	
CHECKED PDW	03-10-05	
APPROVED SJL	03-10-05	

ORIGINAL DRAWING BY
Bibb and associates
8455 Lenexa Drive
Lenexa, Kansas 66214

SDG&E PALOMAR ENERGY CENTER
SOUTH SWITCHGEAR
PHOTO-SIMULATION 1
10/18/11



BEFORE



AFTER



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