

DOCKETED

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Project Title:	Compliance - Application for Certification of the (BAF) American I Cogeneration Project AFC
TN #:	227364
Document Title:	Minor Corrections to Staff Analysis of Petition for Modification to Remove Engineering COC1
Description:	N/A
Filer:	Deric Wittenborn
Organization:	Ellison Schneider Harris & Donlan LLP
Submitter Role:	Applicant
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March 20, 2019

Mr. Anwar Ali
Compliance Project Manager
1516 Ninth Street
Sacramento, CA 95814
Anwar.ali@energy.ca.gov

RE: King City Cogeneration (85-AFC-05C): Minor Corrections to Staff Analysis of Petition for Modification to Remove Engineering Condition of Certification-1

Dear Mr. Ali:

On behalf of Calpine King City CoGen, LLC (“Project Owner”), attached are minor clarifications to the introduction and project location/description sections of the *Staff Analysis of Petition for Modification to Remove Engineering Condition of Certification-1*. (TN#: 227290) These clarifications are necessary to correct information regarding the thermal host, and do not affect Staff’s analysis. The Project Owner has no other comments on the analysis, and agrees with Staff’s recommendation that the petition be approved at the April 10, 2019 Business Meeting.

If you have any questions, please contact either Barbara McBride at (925) 570-0849 or Barbara.McBride@calpine.com, or me at (916) 447-2166.

Sincerely,

/s/
Samantha G. Neumyer
Jeffery D. Harris
Ellison Schneider Harris & Donlan LLP
2600 Capitol Avenue, Suite 400
Sacramento, CA 95816
Email: sgn@eslawfirm.com

Attachment

ATTACHMENT 1

Minor Corrections to Staff Analysis of Petition for Modification to Remove Engineering
Condition of Certification-1

CALIFORNIA ENERGY COMMISSION

1516 NINTH STREET
SACRAMENTO, CA 95814-5512
www.energy.ca.gov



DATE: March 7, 2019

To: Interested Parties

FROM: Anwar Ali, Compliance Project Manager

SUBJECT: King City Cogeneration (85-AFC-OSC)
Staff Analysis of Petition for Modification to Remove
Engineering Condition of Certification-1

On December 21, 2018, Calpine King City CoGen, LLC, filed a petition for modification with the California Energy Commission (Energy Commission) requesting removal of the Engineering Condition of Certification-1 (COC-1) from the Final Decision for the King City Cogeneration facility.

The 130-megawatt Basic American Foods' American 1 Cogeneration Project (Basic) was certified by the Energy Commission in June 1987, and began commercial operation in 1989. In the mid-1990s, Calpine acquired the cogeneration unit of the Basic and renamed it as King City Cogeneration (KCC). The KCC facility currently continues to provides steam to the Rava Business Park, Inc. (ultimate successor to Basic) for its processes~~International, formerly known as Basic~~. The KCC facility is located in King City, Monterey County, California.

The petition for modification was based on the Senate Bill 110 (Stats. 1999, ch. 581), which eliminated the requirement that the Energy Commission perform an Integrated Assessment of Need. The proposed modification would remove the requirement that the facility operate as a gas-fired cogeneration system and produce thermal energy for a steam host in addition to electrical energy. The proposed modification is necessary to accommodate the facility's intended operations in 2019 when its contract with its thermal host ends. The KCC would still be available to meet reliability and system needs without requiring the facility to provide thermal energy to a steam host.

Because this condition of certification is no longer applicable or necessary to ensure KCC's compliance with laws, ordinances, regulations, and standards (LORS), the petition for modification requests removal of this condition.

Energy Commission staff has reviewed the petition pursuant to Title 20, California Code of Regulations, section 1769(a) (Change In Project Design, Operation, or Performance Requirements) and has concluded that removal of COC-1 would not result in a significant impact on the environment, or cause the project to not comply with applicable laws, ordinances, regulations, and standards. Staff intends to recommend approval of the petition at the April 10, 2019 Business Meeting of the Energy Commission.

KING CITY COGENERATION PROJECT (85-AFC-OSC)
Petition for Modification to Remove Engineering Condition of Certification
EXECUTIVE SUMMARY

Anwar Ali, Ph.D.

INTRODUCTION

On December 21, 2018, Calpine King City CoGen, LLC (Calpine), filed a petition for modification with the California Energy Commission (Energy Commission) requesting removal of the Engineering Condition of Certification-1 (COC-1) from the 1987 Final Decision for the King City Cogeneration (KCC) facility.

The 130-megawatt Basic American Foods' American 1 Cogeneration Project (Basic) was certified by the Energy Commission in June 1987, and began commercial operation in 1989. In mid-1990s, Calpine acquired the cogeneration unit of the Basic and renamed it as King City Cogeneration (KCC). The KCC facility currently continues to provide steam to the Rava Business Park, Inc. (ultimate successor to Basic) for its processes~~International, formerly known as Basic~~. The KCC facility is located in the King City, Monterey County, California.

The petition for modification was necessary because the Senate Bill 110 (Stats. 1999, ch. 581) repealed the requirement that the Energy Commission perform an Integrated Assessment of Need. Because this condition of certification is no longer applicable or necessary to ensure KCC's compliance with laws, ordinances, regulations, and standards (LORS), the petition for modification requests removal of this outdated condition.

The purpose of the Energy Commission's review process is to assess whether the proposed amendment would have a significant impact on the environment or cause the project to not comply with applicable laws, ordinances, regulations, and standards (LORS) (Cal. Code Regs., tit. 20, § 1769).

Energy Commission staff has completed its review of all materials received. The Staff Analysis below is staff's assessment of the project owner's proposal to remove COC-1.

PROJECT LOCATION AND DESCRIPTION

The 130-megawatt natural gas-fired power plant was certified by the Energy Commission in June 1987 and began commercial operation in November 1989. The facility is located in the King City in Monterey County, California.

The project uses groundwater from onsite wells for all industrial purposes including evaporative cooling and steam generation for the steam host. Wastewater consisting primarily of blowdown from the cooling towers, as well as wastewater from the food processing plant (Rava International), is discharged to the King City's Industrial Publicly- Owned Treatment Works for treatment and disposal.