

DOCKETED

Docket Number:	81-AFC-01C
Project Title:	Compliance - Application for Certification of the Occidental Plant # 1
TN #:	227620
Document Title:	Calistoga Geothermal Project Unit 19 - Petition for Modification
Description:	N/A
Filer:	Eric Janssen
Organization:	Ellison Schneider Harris & Donlan LLP
Submitter Role:	Applicant Representative
Submission Date:	4/11/2019 3:01:08 PM
Docketed Date:	4/11/2019



April 11, 2019

Mr. Eric Veerkamp
Compliance Project Manager
Siting, Transmission and
Environmental Protection (STEP) Division
California Energy Commission
1516 Ninth Street, MS-2000
Sacramento, CA 95814
E-mail: Eric.Veerkamp@energy.ca.gov

RE: Calistoga Geothermal Project (Unit 19) (81-AFC-01C): Petition for Modification

Dear Mr. Veerkamp:

In accordance with Section 1769 of the California Energy Commission's regulations, enclosed is a Petition for Modification ("Petition") for the Calistoga Geothermal Power Plant ("Calistoga") submitted on behalf of the Geysers Power Company, LLC ("Project Owner"). The Project Owner proposes to replace the existing underground 21 kilovolt standby circuit with an aboveground line, which is critically needed to ensure safe and reliable operation of the facility. Because the proposed modification does not require a change to an existing condition of certification, will not cause any significant environment impacts, and will not affect the facility's compliance with applicable laws, ordinances, regulations, or standards, the Project Owner requests that Staff approve the Petition by May 17, 2019.

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

Sincerely,

/s/

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Calistoga Geothermal Power Plant

(81-AFC-01C)

Petition for Modification To Replace 21kV Standby Circuit

Submitted by
Geysers Power Company, LLC.



April 11, 2019

CALISTOGA GEOTHERMAL POWER PLANT (“UNIT 19”)

81-AFC-01C

PETITION FOR MODIFICATION

Pursuant to Section 1769 of the California Energy Commission’s Siting Regulations, Geysers Power Company, LLC (“Project Owner”) hereby submits this *Petition for Modification to Replace 21kV Standby Circuit* (the “Petition”) for the Calistoga Geothermal Power Plant (“Calistoga” or “Project”). The Project Owner requests that California Energy Commission (“Commission”) Staff approve this Petition by May 17, 2019

As set forth below, the modification requested will replace the existing underground 21-kilovolt (“kV”) standby circuit with an aboveground line. The proposed modification will not affect any conditions of certification, will not have a significant effect on the environment, and will not affect the Project’s ability to continue to comply with applicable laws, ordinances, regulations, or standards (“LORS”).

I. Section 1769(a)(1)(A): Description of the proposed change, including new language for affected conditions of certification.

Due to subsidence issues at Calistoga, the Project Owner is proposing to replace the existing underground 21-kV standby circuit with an aboveground line. This standby circuit, installed during detailed design, is used only when the plant is down and provides standby power to the plant.

Due to subsidence concerns, the Project Owner proposes to install a replacement line, consisting of new conduit and cable that would be installed through a new underground route from Pole 00403 outside the plant yard to a new pole (PP2). (See Attachment 1, “Pole Schedule”.) The replacement line would then transition to an aerial primary attached to poles for four spans and directly feed the existing transformer from overhead at the North end of the switchyard, also shown in the attached drawing. The existing line would be abandoned in place.

No conditions of certification are affected by this Petition.

II. Section 1769(a)(1)(B): Discussion of the necessity for the change and explanation of why the change should be permitted.

Subsidence issues at the facility are compromising the safety of the existing standby circuit. The proposed modification is needed and should be permitted to facilitate continued maintenance and standby capabilities for the Project by re-routing the existing standby line from being entirely underground to being both underground and aboveground, as described in section I, above.

III. Section 1769(a)(1)(C): A description of any new information or change in circumstances that necessitated the change.

Please see sections I and II above. The modification is proposed to address subsidence issues that have arisen post-certification and should be approved to ensure the continued safe and reliable operation of the Project.

IV. Section 1769(a)(1)(D): An analysis of the effects that the proposed change to the project may have on the environment and proposed measures to mitigate any significant environmental effects.

The proposed modification would not have any impacts on the environment, as all work would occur in areas that have been previously disturbed and are used for current facility operations. Further, the replacement of the existing standby line would require only a minor alteration to equipment on site to accommodate the new route for the standby line. Compliance with existing conditions and best management practices governing construction and maintenance activities on site will ensure that there are no significant adverse impacts.

V. Section 1769(a)(1)(E): An analysis of how the proposed change would affect the project's compliance with applicable laws, ordinances, regulations, and standards.

The proposed modification will not impact the Project's ability to comply with all applicable LORS.

VI. Section 1769(a)(1)(F): A discussion of how the proposed change would affect the public.

The proposed modification will not adversely affect the public. No changes to permitted emissions limits are proposed. The modification will not negatively impact air quality or public health. Therefore, there are no potentially significant adverse effects on property owners that will result from the proposed modification.

VII. Section 1769(a)(1)(G): A list of current assessor's parcel numbers and owners' names and addresses for all parcels within 500 feet of any affected project linears and 1000 feet of the project site.

A list of current assessor's parcel numbers and owners' names and addresses for all parcels within 500 feet of the project site will be provided directly to the Compliance Project Manager.

VIII. Section 1769(a)(1)(H): A discussion of the potential effect of the proposed change on nearby property owners, residents, and the public.

The proposed modification will have no potentially significant environmental effects and will be in compliance with all applicable LORS. Therefore, the proposed changes will have no adverse impacts on property owners, the public, or any parties in the application proceeding.

The proposed modification will have no potentially significant environmental impacts and will be in compliance with applicable LORS. There are no physical changes to the facility proposed, and no changes to permitted emissions limits are proposed. Therefore, no property owners will be affected by the modification, and a list is not necessary as part of this Petition.

IX. Section 1769(a)(1)(I): A discussion of any exemptions from the California Environmental Quality Act, commencing with section 21000 of the Public Resources Code, that the project owner believes may apply to approval of the proposed change.

The proposed modification is statutorily exempt from the California Environmental Quality Act (“CEQA”) as described in Title 14, section 15269(b) of the California Code of Regulations as an emergency repair necessary to maintain service essential to public health and safety. The proposed modification is also categorically exempt pursuant to Title 14, Section 15301 of the California Code of Regulations as an activity that constitutes a minor alteration of the existing Project that involves no expansion of an existing use. The proposed modification is also categorically exempt pursuant to Section 15302 as a replacement or reconstruction of existing structures and facilities, as the new line will be located on the same site as the replaced line, and will have substantially the same purpose and capacity as the structure replaced.