

DOCKETED

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CALIFORNIA ENERGY COMMISSION

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CEC-57 (Revised 1/19)



STATEMENT OF STAFF APPROVAL OF PROPOSED CHANGE

POST CERTIFICATION PROJECT CHANGE SMUD COGENERATION PIPELINE PROJECT (92-AFC-02PC)

On December 5, 2019, the Sacramento Municipal Utility District (SMUD) filed a petition with the California Energy Commission (CEC) requesting approval to modify the SMUD Cogeneration Pipeline Project (SMUD Pipeline) to allow for the installation of two service connections on the SMUD Pipeline near the Procter & Gamble Cogeneration Project (PGCP) site.

The SMUD Pipeline is a two-segment (lines 700A and 700B), 50-mile natural gas pipeline that connects to two Pacific Gas & Electric Company (PG&E) natural gas pipelines (#400 and #401), originating north of Winters, California.

The SMUD Pipeline provides natural gas to SMUD's Sacramento County cogeneration facilities (Campbell Soup, Carson Ice-Gen, and Procter and Gamble). A separate natural gas pipeline segment was installed in 2006 to extend the SMUD Pipeline to the Cosumnes Power Plant. This segment, line 800C, is connected at the Carson Ice-Gen facility and was constructed under the CEC's certification and license for the Cosumnes Power Plant (01-AFC-19).

DESCRIPTION OF PROPOSED CHANGE

The modifications proposed in this petition include the following:

- Installation of two natural gas service connections in the area of the PGCP.
 1. The first service connection would be located on the PGCP project site to convey supplier-owned natural gas to the customer, Procter & Gamble, using a 4-inch connection from the SMUD Pipeline at the metering/regulation station that supplies natural gas to the PGCP.
 2. The second service connection would occur within 83rd Street, adjacent to PGCP, just south of the PGCP entrance. This service connection would provide natural gas to the Air Products plant located on the east side of 83rd Street using a 4-inch pipeline.

The CEC's webpage for this facility, [SMUD Cogeneration Pipeline Project](#), has a link to the petition and the Staff Analysis on the right side of the webpage in the box labeled "Compliance Proceeding." Click on the "Documents for this Proceeding (Docket Log)" option.

ENERGY COMMISSION STAFF REVIEW AND CONCLUSIONS

Title 20, California Code of Regulations, section 1769, states that a project owner shall petition the CEC for approval of any change it proposes to the project design, operation, or performance of a previously certified facility.

CEC technical staff reviewed the petition for potential environmental effects and consistency with applicable laws, ordinances, regulations, and standards (LORS). Staff has determined that the technical or environmental areas of Facility Design, Geological Hazards and Resources, Land Use, Power Plant Efficiency, Power Plant Reliability, Public Health, Socioeconomics, Visual Resources, and Waste Management, are not affected by the proposed changes.

For the technical areas of Air Quality, Biological Resources, Cultural Resources, Hazardous Materials Management, Noise, Soil and Water Resources, Traffic and Transportation, and Worker Safety and Fire Protection, staff has determined the project would continue to comply with applicable LORS, and the proposed changes would not result in any significant adverse environmental impacts nor require a change to any conditions of certification.

Staff notes the following for these technical areas affected by the proposed change:

- **AIR QUALITY.** Staff notes that the pipeline project would continue to comply with applicable laws, ordinances, regulations, and standards. The short-term, unavoidable construction emissions would be less than significant with the implementation of existing Condition of Certification AQ-1.
- **BIOLOGICAL RESOURCES.** The proposed project changes would occur in previously disturbed and developed areas used for current facility operations and within 83rd street. Because there are landscaping trees and shrubs in the vicinity for birds to nest in, the project owner has proposed conducting a preconstruction nesting bird survey and implementing Conditions of Certification BIO-1 through BIO-4 in the Commission Decision. Implementation of preconstruction nesting bird surveys and Conditions of Certification BIO-1 through BIO-4 would reduce any potential impacts to less than significant. The proposed project changes would comply with applicable LORS and would not require any changes to the existing biological resources conditions of certification.
- **CULTURAL RESOURCES.** There are no known cultural resources or tribal cultural resources in the locations of the new pipeline service connections and related facilities. In the event that buried cultural resources or tribal cultural resources are encountered during ground disturbance or excavation for the new pipeline service connections, implementation of Conditions of Certification CUL-1

through CUL-7 in the Decision would mitigate any potentially adverse impacts to less than significant.

Mitigation specified in the petition and incorporated into the project proposal in the form of design measures (DM-1 through DM-6) provides updated mitigation measures in line with current CEC standards. DM-1 through DM-6 are consistent with the existing conditions of certification and related activities would be enacted and reported for compliance purposes within the existing conditions' verifications.

Conditions of Certification CUL-1 through CUL-7, and design measures DM-1 through DM-6, were developed to ensure that if cultural resources are encountered during construction, adequate measures would be in place to mitigate any project-level impacts to less than significant and in conformance with the City of Sacramento General Plan Policy HCR 2.1.16 (City of Sacramento 2015).

- **FACILITY DESIGN.** Installation of the pipeline connections must comply with the latest edition of the California Building Code. Implementation of the existing Facility Design conditions of certification would ensure this.
- **HAZARDOUS MATERIALS MANAGEMENT.** During the installation of the two new gas service connections, several hazardous materials would be used that are associated with normal construction activities. These hazardous materials would include solvents, gasoline, lubricants, welding gases, gasket sealers and rust inhibitor coatings. Therefore, with SMUD's continued compliance with existing Conditions of Certification HAZMAT-2, HAZMAT-3, HAZMAT-6, and HAZMAT-7, the proposed changes would not have a significant effect on the environment, and the project would continue to comply with all applicable LORS.
- **NOISE.** Construction work associated with this petition would be temporary and would occur during the daytime hours. Given the project vicinity's industrial nature and the nearest residence being located over ½ mile away, construction noise is not expected to result in significant noise impacts. Construction noise impacts would be further reduced by the implementation of the existing Conditions of Certification NOISE-1 through NOISE-4, which require publicly noticing the construction work, investigating and resolving noise complaints, restricting construction hours to daytime, and evaluating construction worker noise exposure levels to determine the necessary noise attenuation measures. Construction work would create a less-than-significant noise impact.
- **SOIL RESOURCES.** The proposed construction of the two service connections would not result in significant erosion or sedimentation impacts with continued implementation of Condition of Certification SOIL-1. Additionally, construction activities are expected to comply with all applicable LORS. No changes to the conditions of certification are required to address soil resources.

- **TRAFFIC AND TRANSPORTATION.** The project modification would cause less than significant impacts to traffic and transportation. Road and sidewalk work would be temporary, taking place over approximately three weeks, and facilities would be restored after installation of the new service connections. Construction worker and truck trips would be minimal and temporary and would not generate significant vehicle miles travelled. The project owner would work with the City of Sacramento to minimize impacts to the public from the detour. All other project activities would be on-site and would not interfere with any traffic or transportation systems. Impacts would remain less than significant with implementation of the applicable conditions of certification set forth in the Commission Decision. Condition of Certification TRANS-1 requires that the necessary transportation permits from cities, counties, and Caltrans be obtained; TRANS-2 requires that the necessary encroachment permits from cities, counties, and Caltrans be obtained; and Condition of Certification TRANS-9 requires that traffic mitigation plans be developed with the applicable local agencies (in this case, the City of Sacramento.)
- **WATER RESOURCES AND WATER QUALITY.** The proposed construction of the two service connections is expected to require up to 200 gallons of water. This water would be used for the hydrostatic testing of the new service connection piping. The waste water would be collected and returned to the project owner's corporate offices for disposal in accordance with applicable LORS. No discharge or impact to water resources is expected from hydrostatic testing. Existing conditions of certification are adequate to ensure there would be no unmitigated impacts.
- **WORKER SAFETY AND FIRE PROTECTION.** By continuing to comply with the existing conditions of certification, the installation of two new service connections to the existing gas pipeline would not have a significant effect on the environment, and the project would continue to comply with all applicable LORS. Activities to be performed during construction of the new gas service connections would include some excavation of the ground and installation of the pipe. The installation of the proposed new gas service connections would comply with worker safety and fire safety requirements already contained in health and safety plans utilized for construction Condition of Certification SAFETY-1.

ENVIRONMENTAL JUSTICE

Environmental Justice – Figure 1 shows 2010 census blocks in the six-mile radius of the SMUD Cogeneration Pipeline Project with a minority population greater than or equal to 50 percent. The population in these census blocks represents an environmental justice (EJ) population based on race and ethnicity as defined in the United States Environmental Protection Agency's *Guidance on Considering Environmental Justice During the Development of Regulatory Actions*. Staff

conservatively obtains demographic data within a six-mile radius around a project site based on the parameters for dispersion modeling used in staff’s air quality analysis. Air quality impacts are generally the type of project impacts that extend the furthest from a project site. Beyond a six-mile radius, air emissions have either settled out of the air column or mixed with surrounding air to the extent the potential impacts are less than significant. The area of potential impacts would not extend this far from the project site for most other technical areas included in staff’s EJ analysis.

Based on California Department of Education data in the **Environmental Justice – Table 1**, staff concluded that the percentage of those living in the Sacramento City Unified School District (in a six-mile radius of the project site) and enrolled in the free or reduced price meal program is larger than those in the reference geography, and thus is considered an EJ population based on low income as defined in *Guidance on Considering Environmental Justice During the Development of Regulatory Actions*. **Environmental Justice – Figure 2** shows where the boundaries of the school district are in relation to the six-mile radius around the SMUD Cogeneration Pipeline Project site.

Environmental Justice – Table 1
Low Income Data within the Project Area

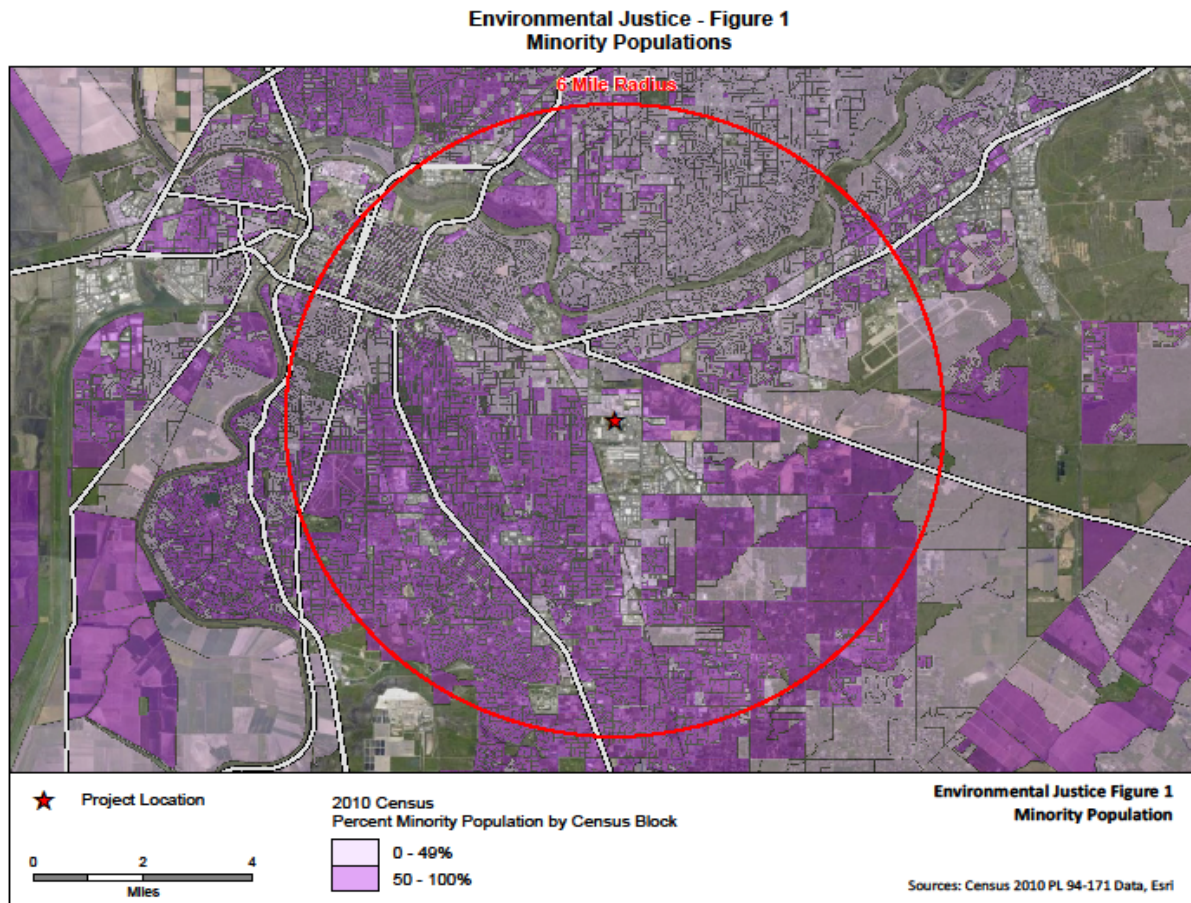
SCHOOL DISTRICTS IN SIX-MILE RADIUS	Enrollment Used for Meals	Free or Reduced Price Meals	Percentage Free or Reduced Price Meals
Elk Grove Unified	63,297	34,107	53.9%
Sacramento City Unified	46,595	32,513	69.8%
San Juan Unified	50,044	26,717	53.4%
REFERENCE GEOGRAPHY			
Sacramento County	245,910	148,221	60.3%

Source: CDE 2018. California Department of Education, DataQuest, Free or Reduced Price Meals, District level data for the year 2017-2018, <<http://dq.cde.ca.gov/dataquest/>>.

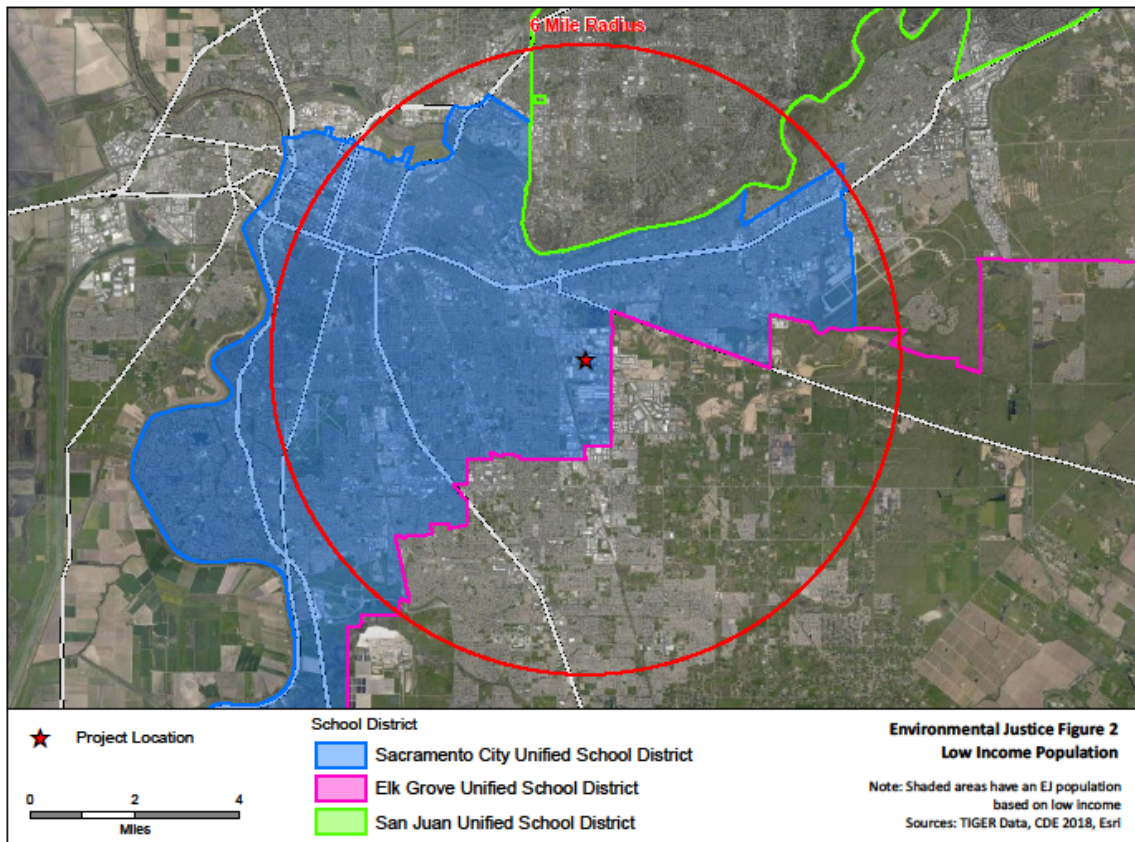
The following technical areas (if affected) consider impacts to EJ populations: Air Quality, Cultural Resources (indigenous people), Hazardous Materials Management, Land Use, Noise and Vibration, Public Health, Socioeconomics, Soil and Water resources, Traffic and Transportation, Transmission Line Safety and Nuisance, Visual Resources, and Waste Management.

Environmental Justice Conclusions

CEC staff identified less than significant impacts in each of the technical areas listed above with the implementation of existing conditions of certification. Therefore, impacts would be less than significant for any population in the project's six-mile radius, including the EJ population represented in **Environmental Justice - Figures 1 and 2**, and **Table 1**.



Environmental Justice - Figure 2
Low Income Population



ENERGY COMMISSION STAFF DETERMINATION

Pursuant to Title 20, California Code of Regulations, section 1769(a)(3)(A), CEC staff has determined for this petition that approval by the Commission at a noticed business meeting or hearing is not required and the proposed changes meet the criteria for approval by staff because:

- i. there is no possibility that the change may have a significant impact on the environment;
- ii. the change would not cause the project to fail to comply with any applicable laws, ordinances, regulations, or standards; and
- iii. the change will not require a change to, or deletion of, a condition of certification adopted by the commission in the final decision or subsequent amendments.

Staff also concludes that the proposed changes do not meet the criteria requiring production of subsequent or supplemental review as specified in Title 14, California Code of Regulations, section 15162(a).

WRITTEN COMMENTS

This Statement of Staff Approval of the proposed project changes has been filed in the docket for this project. Pursuant to section 1769(a)(3)(C), any person may file an objection to staff's determination within 14 days of the filing of this statement on the grounds that the project change does not meet the criteria set forth in sections 1769(a)(3)(A). Absent any objections as specified in 1769(a)(3)(C), this petition will be approved 14 days after this statement is filed.

Written comments or objections to staff's determination may be submitted using the CEC's e-Commenting feature, as follows: Go to the CEC's project webpage and click on either the "Comment on this Proceeding," or "Submit e-Comment" link. When your comments are filed, you will receive an email with a link to them.

Written comments or objections may also be mailed or hand-delivered to:

California Energy Commission
Docket Unit, MS-4
Docket No. **92-AFC-02PC**
1516 Ninth Street
Sacramento, CA 95814-5512

All comments and materials filed with the Dockets Unit will be added to the facility Docket Log and be publically accessible on the CEC's webpage for the facility.

If you have questions about this notice, please contact Chris Davis, Compliance Office Manager, at (916) 654-4842, or by fax to (916) 654-3882, or via e-mail at chris.davis@energy.ca.gov.

For information on public participation, please contact the Public Advisor, at (916) 654-4489 or (800) 822-6228 (toll-free in California) or send your e-mail to publicadvisor@energy.ca.gov.

News media inquiries should be directed to the CEC Media Office at (916) 654-4989, or by e-mail at mediaoffice@energy.ca.gov.

List Serve: SMUD Cogeneration Pipeline Project