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Docket Stamp Updated:	9/8/2021 9:53:20 AM
Docket Number:	21-TPG-01
Project Title:	Roseville Energy Park Temporary Power Generators
TN #:	239616
Document Title:	CEC Staff's Recommendation to License
Description:	STAFF'S RECOMMENDATION TO GRANT LICENSE FOR ROSEVILLE STATE POWER AUGMENTATION POWER SITE (21-TPG-01)
Filer:	Steve Kerr
Organization:	California Energy Commission
Submitter Role:	Commission Staff
Submission Date:	9/8/2021 9:42:41 AM
Docketed Date:	9/8/2021

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Docketed Date:	9/8/2021

Memorandum

To: Drew Bohan, Executive Director

Date: September 8, 2021

From: California Energy Commission
715 P Street
Sacramento, CA 95814-5512

Shawn Pittard
Deputy Director
(916) 661-8213

Subject: STAFF'S RECOMMENDATION TO GRANT LICENSE FOR ROSEVILLE STATE POWER AUGMENTATION POWER SITE (21-TPG-01)

The California Energy Commission's (CEC) Siting, Transmission, and Environmental Protection Division staff hereby submits this recommendation to the Executive Director to grant a license for two temporary power generators at the Roseville State Power Augmentation Power Site (RSPAPS) in accordance with Governor Newsom's Proclamation of State of Emergency issued on July 30, 2021 (Emergency Proclamation), and the CEC's August 17, 2021, Order number 21-0817-2 regarding the process for licensing new emergency and temporary generators.^{1,2}

On September 2, 2021, the city of Roseville, Roseville Electric Utility filed a self-certification application with the CEC requesting a license to temporarily host and operate two 30 megawatt (MW) General Electric Company (GE) TM2500-G4 gas turbine package units [criterion (a)(1)]. The approximately 60-MW natural gas-fired simple cycle electric generating facility would be located adjacent to and on the east side of Roseville Electric Utility's existing Roseville Energy Park (REP) in the city of Roseville, Placer County. The REP is a 160 MW natural gas-fired, combined-cycle electrical generating facility that was certified by the CEC (03-AFC-01) on April 13, 2005 and began commercial operation on November 5, 2007. The California Department of Water Resources (CDWR) has contracted with GE and Kiewit Power Contractors, Inc for the procurement, design, construction, and commissioning of the natural gas-fired temporary power generators (TPGs). The TPGs at this site are planned to commence commercial operation on September 17, 2021, if licensed. Based on the information available at the time of review, the project would deliver net peak energy by October 31, 2021 [criterion (a)(2)].

1 Governor Newsom's July 30, 2021 Emergency Proclamation can be viewed here: <https://www.gov.ca.gov/wp-content/uploads/2021/07/Energy-Emergency-Proc-7-30-21.pdf>

2 CEC's August 17, 2021 Order No. 21-0817-2 can be viewed here: <https://www.energy.ca.gov/filebrowser/download/3659>

The TPGs would be available to be deployed during a grid emergency due to a sudden energy supply shortage in California resulting from an extreme heat wave or wildfire event, as designated and directed by the California Independent System Operator (CAISO). The TPGs would reduce the strain on energy infrastructure, increase energy capacity, and make energy supply more resilient this year to protect the health and safety of Californians.

Staff reviewed the self-certification filed by the Roseville Electric Utility and provides the summary below to support the Executive Director's verification that the self-certification is complete and meets the requirements of section (a) of CEC Order number 21-0817-2. Therefore, staff recommends that the Executive Director file a decision granting the license subject to the conditions and reporting requirements in **Attachment 1**.

Installation

The TPGs would be installed behind two existing water tanks located near the south-eastern corner of the REP site along Phillip Road (see **Figure 1**). Aerial images from 2006 and photographs provided by the applicant show the site was previously disturbed for use as a parking lot and laydown area for the original construction of REP between 2005-2007 [criterion (a)(3)]. The RSPAPS total area is approximately 1.4 square acre. The nearest residence is on an unnamed road, approximately 1,500 feet northeast of the project site.

REP's existing electrical, natural gas, and water infrastructure would be modified to integrate the new TPGs. Site preparation includes the placement of gravel and approximately 1,250 feet of aboveground pipe for natural gas and water connections. For electric connection both TPGs would be connected via an existing generator step-up transformer, located at a spare bay in the REP switchyard, to interconnect into REP's existing 60 kilovolt (kV) transmission lines, which would provide power to the city of Roseville-controlled grid [criterion (a)(1) and (a)(3)iv]. Installation of two new transmission poles located in the northwestern corner of the REP is required for interconnection. The TPGs would utilize Pacific Gas and Electric's existing natural gas line, located west of the site, to interconnect and receive natural gas from REP via above ground piping [criterion (a)(3)ii]. Recycled water from the REP would be pumped, via flex pipe, to the site and processed through a demineralized water treatment module and stored in two 15,000-gallon tanks. A demineralized water forwarding pump skid would then supply the water to the TPGs, as required [criterion (a)(3)iii].

As described below, the TPGs will be retrofitted with a selective catalytic reduction (SCR) system and catalytic oxidation system as soon as practicable. CDWR has indicated that the SCR system would be available and installed by late 2022. [criterion (a)(4)]

Air Quality

The natural gas-fired TPGs are expected to operate very infrequently and during grid emergencies only, as designated and directed by the CAISO, until they meet all local, state,

and federal regulatory requirements. Because the TPGs will only operate under emergency conditions for a limited time, this emergency operation is not expected to result in a significant emissions increase (an increase in emissions that is significant for that pollutant that is defined and regulated under the United States Environmental Protection Agency's (U.S. EPA) New Source Review program).

As required by the Emergency Proclamation, the California Air Resources Board (CARB) is developing a mitigation strategy to offset emissions associated with emergency operations. The mitigation plan must include investments to improve air quality in communities, with a particular focus on disadvantaged communities, and to reduce risk to sensitive populations. Details of mitigation options will be determined through a public process. To the extent feasible, CARB will gather local perspectives on how best to mitigate the effects of local increases of emissions to potential and historically affected parties.

Projected Emissions

Emissions guarantees are valid for the ambient temperature range from 9°F to 118°F and a gas turbine generator (GTG) load between 50% and 100% of capacity as defined in steady state conditions. Emission guarantees are as follows:

- NO_x: 25 ppmvd at 15% O₂,
- CO: 203 ppmvd at 15% O₂.

Current best available control technology (BACT) limits for these TPGs under air district rules and regulations are as follows:

- NO_x: 5 ppmvd at 15% O₂,
- CO: 6 ppmvd at 15% O₂,
- VOC: 2 ppmvd at 15% O₂.

The TPGs would comply with PM₁₀ and SO₂ BACT requirements by using pipeline quality natural gas.

The selective catalytic reduction (SCR) and oxidation catalyst are advanced active emission control technology systems that are not off-the-shelf products and require custom engineering design before manufacture, delivery, and installation. There would be a 10 to 12-month lead time for delivery and it would take an additional 1 to 2 months for installation. In September 2021, CDWR will start negotiations with GE to procure the SCR for the RSPAPS [criterion (a)(4)]. SCR commissioning is anticipated by late 2022. Once these post combustion controls are installed on the TPGs, a BACT determination will be made by the Placer County Air Pollution Control District (PCAPCD) to ensure the TPGs are in compliance with permit requirements. The SCR and oxidation catalyst are expected to bring the remaining criteria pollutants (i.e., NO_x, CO, and VOCs) into compliance with BACT.

PCAPCD is in the process of granting Authority to Construct (ATC) and Permit to Operate (PTO) permits to the TPGs. The PTOs would rely on the Emergency Proclamation and the United States Department of Energy's (DOE) Section 202(c) order, which would temporarily waive federal permitting requirements, such as the National Ambient Air Quality Standards under the Clean Air Act, as the TPGs are unable to comply without the SCRs. The project operator would report emissions from the TPGs in excess of federal air permits to the CEC for transmittal to the CARB [criterion (d)]. The operators are expected to bring the TPGs into compliance with all regulatory requirements by the earliest feasible opportunity.

Ambient Temp	F	100	100	100	100	100	100
GTG Load	%	100	90	80	70	60	50
NOx	lb/hr	26.7	26.7	26.7	26.7	26.7	26.7
CO	lb/hr	33.2	34.9	33.1	30.8	26.5	30.4
VOC	lb/hr	2.3	2.4	2.3	2.1	1.8	2.1
PM10/PM2.5	lb/hr	4	4	4	4	4	4
SOx	lb/hr	0.2	0.19	0.17	0.16	0.14	0.12

Event	Duration (min)	Heat Input (MMBtu - HHV)	NOx (lb)	CO (lb)	VOC (lb)	PM10/PM2.5 (lb)	SOx (lb)
Startup	10.0	19.6	3.1	19.4	0.8	0.5	0.1
Shutdown	9.0	23.4	3.4	21.6	0.9	0.6	0.3

Stack Information

Exhaust parameters vary with ambient conditions. Since the TPGs are only expected to operate during grid emergencies, which are expected to occur on hot days, the following stack information and parameters reflect those for a 100-degree day:

- Stack Height: 26' 1-1/4"
- Exhaust Velocity: 190 ft/s
- Exhaust Temperature: 982.7 °F
- Exhaust Flow: 178.1 lb/s

Testing Requirements

GE has provided emission guarantees for NOx and CO based on the following EPA source test methods:

- NOx: EPA METHOD 20 (25 ppmvd at 15% O₂)
- CO: EPA METHOD 10 (203 ppmvd at 15% O₂)

- PM10/2.5 and SO₂ emissions would meet BACT requirements through the use of natural gas fuel.

Additional source testing verification is not proposed as TPGs are expected to operate very infrequently and during grid emergencies only, as designated and directed by the CAISO, until they meet all local, state, and federal regulatory requirements. Performing additional source testing would require the TPGs to operate for prolonged periods of time that they would not otherwise experience.

Biological Resources

The site of the TPGs at RSPAPS has been surveyed for the presence of biological resources as recently as August 2021. The site was previously disturbed and developed and allowed to regrow naturally, resulting in a mix of vegetation that is considered ruderal/annual grassland. As no permanent habitat loss is associated with the proposed project on disturbed land, no direct impacts such as loss of state- or federally-protected plants, wildlife, or habitat is expected. Additionally, no loss of denning or nesting wildlife would be associated with the project as there are no onsite trees or shrubs, and results of the 2021 survey revealed no presence or sign of sensitive species, such as burrowing owl, on or adjacent to the project site. Indirect impacts such as lighting, installation and operational noise, and storm water runoff are expected to be minimal and temporary. Wildlife likely have habituated to such activities at adjacent industrial facilities like the REP.

NO_x emissions from operation of the TPGs would result in nitrogen deposition from the atmosphere to the biosphere. Excessive nitrogen deposition can act as a fertilizer and promote the growth of non-native vegetation. The increased dominance and growth of invasive annual vegetation is especially prevalent in low-biomass vegetation communities that are naturally nitrogen-limited, but other vegetation communities could also be affected, particularly those with a closed nutrient cycle. Based on CEC staff's best estimate, the TPGs would run infrequently and during grid emergencies only, as designated and directed by the CAISO, and therefore it is not expected that this low production would adversely influence surrounding sensitive habitat. Deposition of nitrogen oxides is not expected to adversely affect state or federally protected species or habitat; therefore, no mitigation is required.

As required by CEC, the city of Roseville will implement a Workers Environmental Awareness Program (WEAP) based on the REP's existing WEAP to educate and train on-site staff to recognize, avoid, and report biological resources. Other measures include placement of straw waddles to limit stormwater runoff and avoidance flagging of sensitive areas adjacent to the site. [criterion (a)(5)]

Cultural Resources

The site of TPGs at RSPAPS has been surveyed for the presence of cultural resources six times between 2001 and 2003. The surveyors did not identify any cultural resources at the site of

the TPGs. The package unit project site is situated in an area that formerly supported concrete foundations and buildings, all of which was demolished around 2007 or 2008. The ground surface in this area is disturbed and discovery of cultural resources during installation of the TPGs is not expectable.

If excavation of utility trenches or other ground disturbance is required to install the TPGs, the city of Roseville will implement responsible best management practices as required by CEC to prevent or ameliorate the impact of inadvertent cultural resource discoveries. These practices are based on the REP's existing WEAP. For cultural resource concerns, the best practices will consist of retaining an environmental coordinator to oversee compliance with mitigation requirements; including procedures for responding to inadvertent discoveries of cultural resources or human remains in the WEAP; and implementing stop-work, assessment, and reporting procedures in the unlikely event of an inadvertent discovery. [criterion (a)(5)]

Environmental Justice

CEC staff reviewed and applied the environmental justice methodology used by DOE—the Federal Interagency Working Group on Environmental Justice and NEPA Committee's Community Guide to Environmental Justice and NEPA Methods—to determine whether the project is located in an environmental justice community. CEC staff also used the methodology in the U. S. EPA's Guidance on Considering Environmental Justice During the Development of Regulatory Actions, which is consistent with the DOE's methodology. Based on these methodologies, CEC staff used the most current data available, which is from the U.S Census, to determine whether the population in the census tract in which the project is located (06061021322) is considered an environmental justice community based on minority (race and ethnicity) or low-income status. CEC used 2019 5 Year American Community Survey data at the Census tract level, specifically, DP05 ACS Demographic and Housing Estimates for minority data and S1701 Poverty Status in the Past 12 Months for low-income data. Based on this data, CEC staff determined that the population within the project's census tract is not considered an environmental justice population based on minority or low-income status.

In addition to identifying whether the population residing within the project area (census tract in which the project is located) is considered an environmental justice community, CEC staff also looked to the current environmental setting in which the project is proposed to determine whether the project's census tract can be considered environmentally burdened. This consideration is separate from whether a population is considered an environmental justice population, or not. This additive consideration can provide more environmental information on metrics such as air pollution, water pollution, wastewater discharges, hazardous waste presence, versus an environment with low pollution levels and few contaminated properties.

At the Federal level, the tool to conduct this analysis is EJSCREEN. CEC staff used this public online screening tool which can be used to better understand the demographic and environmental risk indicators in a geographic area (project's census tract) to ensure that community concerns are not overlooked. It presents demographic and environmental

information for a selected geography. The individual indicators have a score. CEC staff compared the environmental indicators with all of those in California. There is no overall score, unlike the overall score provided by the CalEnviroScreen tool. CEC staff interprets percentiles at 90 or above, compared with statewide levels, to be worth noting when considering how a project would impact a community. None of the EJ Indexes in which RSPAPS is located had percentiles at 90 or above. The highest percentile, 15, was for the lead paint indicator.

At the California State level, the tool to conduct this analysis is CalEnviroScreen 3.0. Staff used this public online screening tool to determine if the site is located within a disadvantaged community (DAC) and confirmed the census tract within which the RSPAPS site is located has an overall CalEnviroScreen percentile of 21.58 and thus is not considered a DAC. Scores are presented for the individual indicators and a total overall score is presented. The scores are compared with all the scores throughout California's roughly 8,000 census tracts. An overall score in the 75th percentile or above, is considered a DAC.³

Therefore, staff does not anticipate that the installation and operation of the TPGs at the proposed site would overburden or disproportionately impact an EJ population. CARB is responsible for developing and implementing a State-funded plan to mitigate the effects of additional emissions authorized by Emergency Proclamation beyond ordinarily permitted levels. The mitigation plan will include plans to invest in programs to improve air quality in communities and to reduce the risk to sensitive populations.

Facility Design

The CEC would verify that design and construction of the facility complies with the applicable California Building Code through a third-party California-licensed delegated chief building official (DCBO) contractor. Verification would include review of materials and methods documentation of the facility design and construction to be submitted by the project operator, followed by onsite inspections by the DCBO and CEC staff [criterion (a)(6) and (a)(8)]. If any significant code-violation items are found, the DCBO would include them in a report as punch-list items and will follow up to ensure that they are resolved.

Hazardous Materials

No acutely toxic hazardous materials would be used at RSPAPS during operation, and none of the proposed-for-use materials would pose significant risk of off-site impacts because of the quantities on site, their relative toxicity, their physical state, or their environmental mobility. The hazardous materials to be used for the TPGs would also be added to the REP's Hazardous Materials Business Plan to inform first responders during any emergency. The REP's Emergency Action Plan would include any required emergency response actions, including facility evacuation, hazardous material spill clean-up, and fire prevention. The proposed project would

³ CalEPA 2017 – California Environmental Protection Agency (Cal/EPA). Designation of Disadvantaged Communities Pursuant to Senate Bill 535 (De Leon), April 2017. Available online at:
<https://calepa.ca.gov/wp-content/uploads/sites/6/2017/04/SB-535-Designation-Final.pdf>

have a less than significant impact to the public and meets the self-certification requirements related to Hazardous Materials. [criterion (a)(5)]

Hydrology and Water Quality

The RSPAPS TPGs would be located on a 1.4-acre previously disturbed land adjacent to the site of the REP. If a project would disturb a total of 1.0 acre or more of land, it would have to file for coverage under the Construction General Permit (CGP) The CGP is a National Pollutant Discharge Elimination System (NPDES) permit administered by the State Water Resources Control Board (State Water Board) which includes filing a construction Stormwater Pollution Prevention Plan (SWPPP). However, according to communication between CDWR and the State Water Board staff, the State Water Board allows for emergency projects to start construction before a CGP has been issued provided that the project operator files for coverage within 30 days of start of construction. CDWR was informed by the State Water Board through email communication that because of the low rain erosivity of the project site the requirements of a CGP/SWPPP could be waived. The rain erosivity for the site is low primarily because it is unlikely that the site would receive any significant rain since construction would occur outside the rainy season (October-May). CDWR asked and the State Water Board issued a waiver for the requirements of a construction SWPPP through WDID 5S31W005183. The waiver is valid through November 1st, 2021. If construction is expected to last beyond November 1st, the project operator would have to recalculate a new rain erosivity factor and revise the data submitted to the State Water Board. If the rain erosivity factor remains low (under 5), the waiver would be extended. However, if the erosivity factor increases to more than 5 because significant rain is more likely to occur during November, the project operator would be required to file for coverage under the construction SWPPP.

The State Water Board informed the project operator that for the industrial SWPPP the project would be considered an extension of the REP and instructed the operator to update the existing industrial SWPPP to include the new addition. A consultant for the project operator has started the process to update and file the industrial SWPPP. While the industrial SWPPP would not be in effect until after construction has been completed, the consultant anticipates that the new industrial SWPPP should be updated and filed in approximately seven business days.

Demineralized water for NO_x control would be produced using a trailer mounted mixed-bed polishing system. The demineralized water would be stored in two 15,000-gallon trailer-mounted tanks. Water used to produce the demineralized water would be Title 22 recycled water obtained from REP. The amount of water needed for the temporary generators would be minimal and is not expected to cause REP to exceed its permitted annual water consumption.

The proposed project would have a less-than-significant impact to the public and it meets the self-certification requirements related to Hydrology and Water Quality. [criterion (a)(3)iii and (a)(5)]

Land Use

The proposed project meets the self-certification requirements related to Land Use. The city of Roseville provided copies of a Grant Deed and property report with their self-certification exhibiting control over the site [criterion (a)(3)]. When the REP was designed and constructed, the original approximately 40-acre property, which the RSPAPS is within, was planned as a hub for various generating technologies. Accordingly, the site can accommodate additional generating capacity. CDWR identified the RSPAPS/REP site as one of a very few in California capable of rapidly developing generation capacity. On August 16, 2021, the City Council of Roseville adopted a resolution authorizing Right of Entry and authorizing negotiations of at least three separate agreements between Roseville and CDWR: Site Use and Installation Agreement; Operation and Maintenance Agreement; and an Energy Services Agreement.⁴ The City Council approved the site use and installation agreement at their September 1, 2021 meeting, and the remaining two agreements will be presented to for City Council consideration at a later date.⁵

The project site is zoned Public/Quasi-Public. The project site is not mapped or zoned as Farmland, agriculture, forest land, or timberland, and is not located in an area designated by the California Public Utilities Commission as Fire Threat. Additionally, the project would not remove healthy, mature scenic trees.

Transmission Systems

The proposed interconnection to the existing switchyard including the step-up transformer and breakers appear to be adequately sized. Roseville Electric Utility has initiated the generator interconnection process with the transmission owner, the Western Area Power Administration. The proposed project meets the self-certification requirements related to receiving authorization to interconnect the TPGs to the transmission grid. [criterion (a)(7)]

Noise

The expected sound emissions from the TPGs at the RSPAPS were modeled using an industry-accepted sound prediction model. The structures associated with the existing REP were included in the model to take into account their effect on sound propagation in various

⁴ City of Roseville City Council Meeting Agenda for August 16, 2021 can be viewed here:

<https://roseville.novusagenda.com/AgendaPublic/MeetingView.aspx?MeetingID=1536&MinutesMeetingID=1183&doctype=Agenda>

⁵ City of Roseville City Council Meeting Agenda for September 1, 2021 can be viewed here:

<https://roseville.novusagenda.com/AgendaPublic/MeetingView.aspx?MeetingID=1393&MinutesMeetingID=1189&doctype=Agenda>

directions. Based on this modeling, the noise levels would not exceed 68 dBA at the project boundaries, would be 45-48 dBA at the nearest residential receptors to the east and east/northeast, 52 dBA at the nearest residence to the north, and 46 dBA at the residences west/southwest.⁶ For residential receptors, the EPA's recommended threshold is 55 dBA for daytime hours of 7 a.m. to 10 p.m. and 45 dBA for the nighttime hours of 10 p.m. to 7 a.m. The project's noise levels would be within the EPA's daytime threshold. Any nighttime operation, when it would be desirable to keep the sound level at or below 45 dBA, would be unlikely or rare. The project's noise impact to the public would be less than significant and the project meets the self-certification requirements related to noise [criterion (a)(6)].

Modeling results are usually accurate and CEC staff does not anticipate any noise-related concerns. However, to ensure the public can report any undesirable noise conditions associated with the project, staff has included a noise complaint reporting and resolution process in **Attachment 1**.

⁶ 50 dBA is equivalent to rain, car driving at approximately 25 mph at 100 feet or quiet conversation. 70 dBA is equivalent to a gas lawnmower at 100 feet, or car driving at 65 miles/hour at 50 feet.

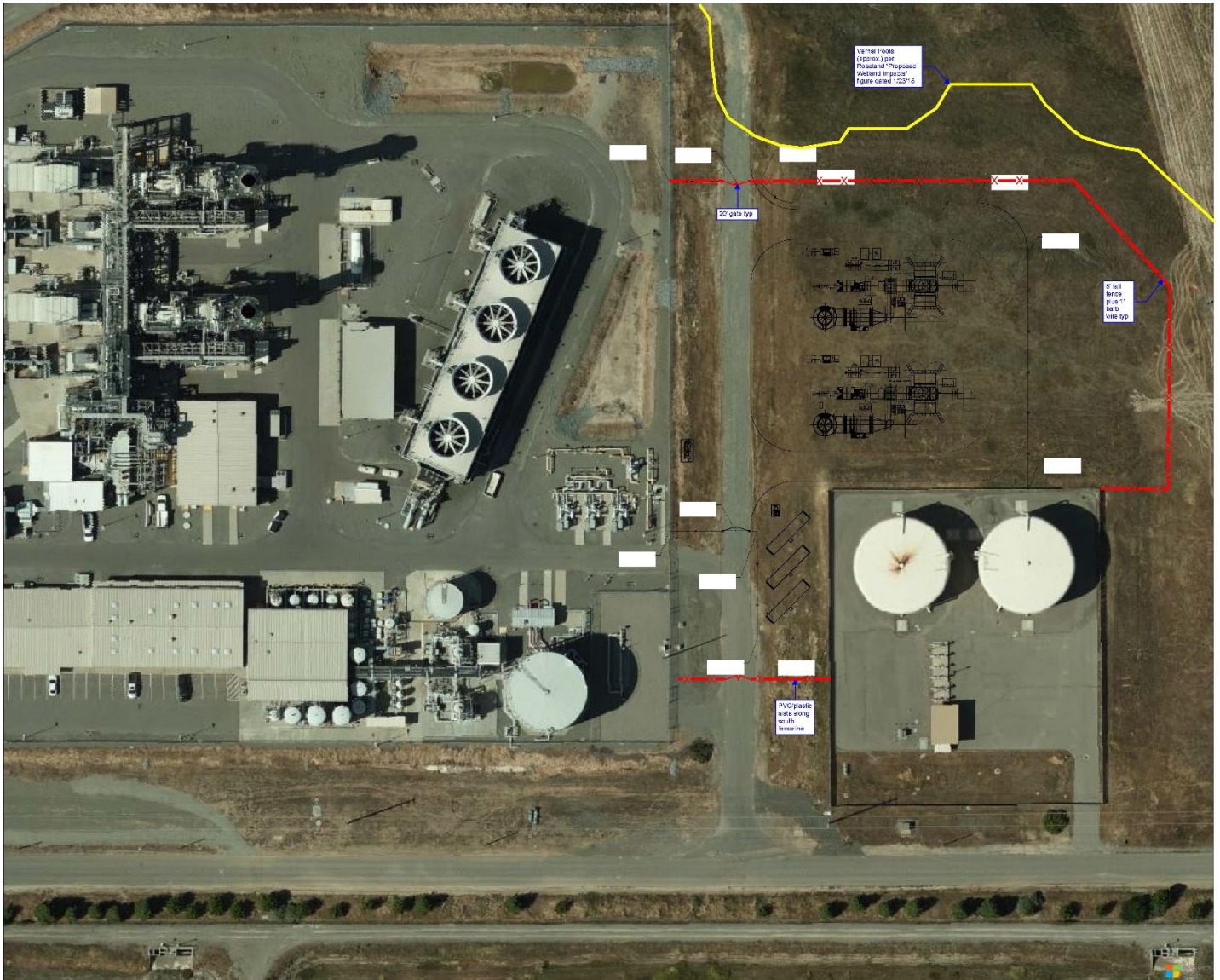
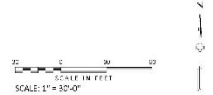


Figure 1: Site Plan
Source: TN239574 Roseville's CEC Permit Application - Part 1



ATTACHMENT 1:
ROSEVILLE STATE POWER AUGMENTATION POWER SITE (21-TPG-01)
CONDITIONS AND REPORTING REQUIREMENTS (CRR)

CRR-1: The project operator shall provide a quarterly compliance report to the CEC Compliance Project Manager (CPM) including a record of the number of persons who have completed the Workers Environmental Awareness Program training in the prior quarter and a running total of all persons who have completed the training to date. The signed training acknowledgement forms from construction shall be kept on file by the project operator for a period of at least 6 months after the start of commercial operation. During project operation, signed statements for active project operational personnel shall be kept on file for 6 months following the termination of an individual's employment.

CRR-2: If a cultural resource is found during installation of the project, the project operator shall provide the following documentation to the CPM:

- A description of the cultural resource, the circumstances surrounding its discovery, actions taken to protect the resource, and the disposition of any artifacts or features that came into the project operator's possession
- A confidential map of the discovery location on an aerial photograph or project plans
- Photographs of the cultural resource and constituent artifacts or features

If human remains are found during installation of the project, the project operator shall document the discovery as described in the bulleted list above and demonstrate compliance with California Health and Safety Code, Section 7050.5(b). Demonstration of compliance may include:

- Telephone conversation logs
- Copies of email exchanges
- Minutes from field meetings

The project operator shall provide the documentation described in the previous paragraphs with the reports required under CRR-1, in a confidential appendix. The project operator shall keep this documentation on file for at least 6 months following the start of commercial operation.

CRR-3: The Environmental Coordinator (EC) shall be retained by the project operator. The EC will have the authority to review and approve the following materials and assume the following duties:

- Per CCR-4, design the Worker Environmental Awareness Program;
- issue stop-work orders as per CCR-4;
- Report to the CPM, CDFW or USFWS any take of special status plants, wildlife, or habitat (per CCR-6);
- the EC shall have the following qualifications: at minimum, will hold a bachelors degree in in Environmental Science, Environmental Planning, Urban Planning, or a

related field, as well as a minimum of 3 years of applicable, relevant experience;
and

- the EC shall be available to the CPM or their CEC staff-designee, for consult and updates upon request.

CRR-4: The project operator shall implement a Worker Environmental Awareness Program (WEAP) in which each of its employees, as well as employees of contractors and subcontractors who work on the project site or any related facilities during site mobilization, ground disturbance, grading, construction, operation and closure, is informed about sensitive biological and cultural resources associated with the project.

The WEAP must:

- be developed by or in consultation with the Environmental Coordinator and consist of an on-site or training center presentation in which supporting written material and electronic media are made available to all participants;
- discuss the locations and types of known sensitive biological resources on the project site and adjacent areas;
- present the reasons for protecting these resources;
- A discussion of applicable laws and penalties under law;
- Samples or visuals of artifacts that might be found in the project vicinity;
- A discussion of what such artifacts may look like when partially buried, or wholly buried and then freshly exposed;
- A discussion of what prehistoric and historical archaeological deposits look like at the surface and when exposed during construction, and the range of variation in the appearance of such deposits;
- present the meaning of various temporary and permanent habitat protection measures;
- identify whom to contact if there are further comments and questions about the material discussed in the program;
- Instruction that work crews are to halt work in the vicinity of a potential cultural resources discovery, and shall contact their supervisor, and that redirection of work would be determined by the Environmental Coordinator and the CPM; and
- include a training acknowledgment form to be signed by each worker indicating that he/she received training and shall abide by the guidelines.

Verification: The project operator shall provide a quarterly compliance report to the CPM a record of the number of persons who have completed the training in the prior

months and a running total of all persons who have completed the training to date. The signed training acknowledgement forms from construction shall be kept on file by the project operator for a period of at least 6 months after the start of commercial operation. During project operation, signed statements for active project operational personnel shall be kept on file for 6 months following the termination of an individual's employment.

CRR-5: The project operator shall undertake the following:

- Provide representative schematics, diagrams, or shapefiles of the final package unit configuration and linear connections;
- the project operator shall design, install, and maintain project-related features such as access roads and storage and parking areas to avoid identified sensitive resources;
- Stake or fence the limits of the work zone and access roads, and prohibit any offsite use or impacts;
- eliminate from landscaping or revegetation plans any List A California exotic pest plants of concern as defined by the California Exotic Pest Plant Council;
- prescribe a road sealant that is non-toxic to wildlife and plants; and
- design, install, and maintain any additional necessary facility lighting to prevent side casting of light toward native habitat.

Verification: Implementation of the measures will be reported in the quarterly compliance reports by the project operator.

CRR-6: The project operator shall implement the following measures to manage its construction site (and related facilities) in a manner to avoid or minimize impacts to local biological and cultural resources:

- Install temporary fencing and provide wildlife escape ramps for construction areas that contain steep-walled holes or trenches if outside an approved, permanent exclusionary fence. The temporary fence shall be hardware cloth or similar material that is approved by the CPM, and CDFW;
- ensure that all food-related trash is disposed of in closed containers and removed at least once a week;
- prohibit feeding of wildlife by staff and subcontractors;
- prohibit non-security-related firearms or weapons on site;
- prohibit pets on site;

- report all inadvertent deaths of sensitive species to the Environmental Coordinator, who will, within 24 hours, notify the CPM, CDFW or United States Fish and Wildlife Service, as appropriate; and
- minimize use of rodenticides and herbicides in the project area.

Verification: Implementation of the measures shall be reported in the quarterly compliance reports by the Environmental Coordinator. Within 30 days after completion of project deployment, the project operator shall provide to the CPM, for review and approval, a written construction termination report identifying how environmental resource measures have been completed. This report may or may not be coincidental with the quarterly monitoring report.

CRR-7: The project has been issued a waiver of the requirements of a construction stormwater pollution prevention plan (SWPPP) by the State Water Resources Control Board based on the low rain erosivity of the site. However, the project operator shall implement stormwater best management practices (BMPs) to ensure that no contaminated water is discharged off-site. Examples of contaminated water include dust suppression water, equipment wash water, and contact stormwater or sediment laden stormwater in the unlikely event that significant rain falls on the project site during construction.

CRR-8: Prior to operation of the temporary power generators, the project operator shall notify the residences within 2500 feet from the project site, by mail or by other effective means, of the commencement of project operation. The notification shall include a telephone number for use by the public to report any undesirable noise conditions during the operation of the project. Within five business days, project personnel shall notify the CPM that the above notification has been sent.

If the project receives a noise complaint, project personnel shall document and investigate the complaint to determine the source of the noise. If the investigation determines that the noise is project related, project personnel shall attempt to resolve the complaint to the satisfaction of the complainant.

The project operator shall use the attached Noise Complaint Resolution Form or a functionally equivalent procedure, to document and respond to the noise complaint. The completed form shall be submitted to the CPM within three business days following its completion.

If project personnel and complainant cannot reach consensus, project personnel shall notify the CPM.

CRR-9: After construction is complete, the project operator shall submit Semi-Annual Compliance Reports; the project may be required to submit additional compliance reports as mandated by the technical areas. The reports are due to the CPM at a date

agreed to by the CPM. Each Semi-annual Compliance Report shall identify the reporting period and shall contain the following:

- An updated compliance matrix, in a spreadsheet format. The compliance matrix must identify the following:
 - the technical area and number of the conditions and reporting requirements;
 - a brief description of the submittal required;
 - the date when the submittal is required and the expected or actual submittal date; and
 - the compliance status of each condition and reporting requirement.
- A summary of the current project operating status and an explanation of any significant changes to facility operations;
- Documents required by specific conditions and reporting requirements to be submitted along with the Semi-Annual Compliance Report as attachments; and
- A listing of filings made to, or permits issued by, other governmental agencies during the year.

CRR-10: The project operator shall report and provide copies of all incidents, complaints, notices of violation, notices of fines, official warnings, and citations, within seven days of receipt or occurrence, to the CPM. Complaints shall be logged and numbered.

CRR-11: At the end of the life of the permit, to ensure that a planned facility closure does not create adverse environmental, health, and safety impacts, the project operator shall submit a facility closure plan to the CEC for review and approval at least 6 months (or other time period agreed to by the CPM) prior to commencement of closure activities.

CRR-12: The project operator shall comply with the terms and conditions of the Authority to Construct (ATC) and the Permit to Operate (PTO) issued by the Placer County Air Pollution Control District (PCAPCD).

In the event that the air district finds the project to be out of compliance with the terms and conditions of the ATC/PTO, the project operator shall notify the CPM of the violation, and the measures taken to return to compliance, within five days.

CRR-13: The project operator shall provide an emissions reporting protocol to the CPM for review and approval. The emissions reporting protocol shall explain the procedures for estimating criteria pollutant emissions during emergency operation and reliability testing. The protocol shall list the calculation methodologies, operational parameters used to quantify emissions (e.g., fuel flow, gross calorific value of fuel, predetermined emission factors, water injection, megawatts, etc.), and any assumptions made in the estimate. The protocol shall be submitted at the end of each operating quarter for approval.

Upon approval of the protocol, the operational emissions shall be reported using and presenting the same calculation methodologies, operational parameters and assumptions used to quantify emissions. Emissions shall be reported to the CPM quarterly. In addition to emissions reporting, the reported data shall include fuel use, hours of operation and times of operation, and energy produced by that use and operation.

CCR-14: Unless determined necessary on an ongoing basis, improvements to the site such as concrete pads, gravel lining, and temporary or permanent fencing must be removed.

Verification: Within one month of cessation of operation, the project operator must provide a final report documenting removal of project facilities (this may or may not be coincidental to the quarterly report).

NOISE COMPLAINT RESOLUTION FORM

Roseville State Power Augmentation Power Site

NOISE COMPLAINT LOG NUMBER _____

Complainant's name and address:

Phone number: _____

Date complaint received: _____

Time complaint received: _____

Nature of noise complaint:

Definition of problem after investigation by plant personnel:

Date complainant first contacted: _____

Description of corrective measures taken:

Complainant's signature: _____ Date: _____

This information is certified to be correct:

Plant Manager's Signature: _____

ATTACHMENT 2: SELF-CERTIFICATION CHECKLIST

TEMPLATE FOR LICENSING NEW EMERGENCY AND TEMPORARY POWER GENERATORS						
LICENSE APPLICANT ENTITY: Roseville Electric Utility		APPLICANT PRIMARY CONTACT NAME: Petra Wallace		EMAIL ADDRESS: PWallace@roseville.ca.us		PHONE NUMBER: 916-595-8327
<i>COLUMNS BELOW FOR CEC STAFF USE ONLY</i>						
	SELF-CERTIFICATION YES OR NO	PROVIDE WITH CHECKLIST	DOCUMENTATION PROVIDED AS ATTACHMENT	ADEQUATE YES OR NO	INFORMATION NEEDED TO MAKE ADEQUATE	APPLICABLE ENVIRONMENTAL CONDITIONS
Cover Letter	N/A	Letter dated and signed by each applicant attesting under penalty of perjury to the application's truth and accuracy.	YES, 1.19.20 Roseville Statement of Agreements	YES	N/A	N/A
General Project Description	N/A	Provide a general description of the proposed temporary power generator site and a site map delineating the fence line.	YES, 2. Project Description and Map	YES	N/A	N/A
<u>III. CRITERIA AND PROCEDURES</u>						
(a)(1) The power generator(s) will deliver 10 MW or more on a single grid intertie.	YES	Unit description, manufacturer specifications and cut sheets for engine-generator package.	13. DWR Attestation to Provide As-Built Drawings and Manufacture's Cut Sheets	YES	N/A	N/A
	YES	Description and one-line diagram showing the generating unit's proposed intertie to the substation, including GSU, breakers and switches.	YES, 4. Intertie diagram and description	YES	N/A	N/A
(a)(2) the power generator(s) will deliver net peak energy no later than October 31, 2021.	YES	Schedule showing estimated major milestones including generator delivery, interconnection agreements, fuel and	YES, 5. Project Timeline.Roseville	YES	N/A	N/A

		demin water availability.				
(a)(3) The owner or operator has control over the site, and	YES	Copy of proof of site control (e.g., certificate of title, a deed, ALTA survey, lease agreement or other legal document specifying ownership).	YES, 6. Grant Deed and 6. Property Report	YES	N/A	N/A
(a)(3)i. generation will be located in a previously disturbed site;	YES	Date-stamped photographs, aerial photographs, maps, or documents that show the site consists-or consisted of- a concrete pad, pavement, gravel, previously excavated, compacted, or otherwise improved area.	YES, 7. Proof of Disturbed Area	YES	N/A	N/A
	YES	A description of previous disturbances or development of the candidate site.	YES, 7. Proof of Disturbed Area	YES	N/A	N/A
(a)(3)ii. generation will use natural gas as soon after construction as practicable;	YES	Initial fuel plan if not natural gas, and description of plan and schedule for conversion to natural gas.	N/A, Initial fuel plan is NG	YES	N/A	N/A
(a)(3)iii. there is a secure water supply for the project; and	YES	Description of planned demin water supply including source, storage and replenishment methods.	YES, 10. Demineralized Water Supply, 10. SWPPP Waiver-Roseville and, 10. Email-Water Board-Waiver	YES	N/A	N/A
(a)(3)iv. there is an available grid interconnection.		See (a)(7) below.				
(a)(4) The power generator(s) can accommodate best available control technology (BACT) and the owner or operator will install BACT as soon as practicable. Operators of sites on which generators and equipment	YES	Description of plan for how and when the engine-generator will be made BACT compliant as soon as practicable.	YES, 11. BACT Compliant	YES	N/A	N/A

procured by DWR have been located shall collaborate with DWR on the installation of BACT.						
(a)(5) The owner or operator will implement best management practices and a worker environmental awareness program, as appropriate, during installation and removal of the power generators to protect any environmental resources.	YES	Copy of worker environmental awareness program, storm water pollution prevention, if applicable, and other associated best management practices that will be implemented at the site.	YES, 12. Environmental Awareness Program. Roseville and 12. Best Management Practice Letter	YES	N/A	CRR-1 CRR-2 CRR-3 CRR-4 CRR-5 CRR-6 CRR-7
(a)(6) The installation of the power generator(s) will be consistent with manufacturer specifications and safety codes and standards.	YES	Attestation letter with agreement to provide completed engineering drawings for installation of the power generator package and all associated appurtenances after commissioning.	YES, 13. Proof of Installation and 13. DWR Attestation to Provide As-Built Drawings and Manufacture's Cut Sheets	YES	N/A	N/A
		Manufacturer cut sheet(s) for all balance of plant appurtenances related to the power generator(s) package	YES, 13. DWR Attestation to Provide As-Built Drawings and Manufacture's Cut Sheets	YES	N/A	N/A
	YES	Manufacturer cut sheet(s) for the step-up transformer, if applicable	YES, 15. Step-up Transformer	YES	N/A	N/A
	YES	Manufacturer's cut sheet showing noise specification(s) for the turbine(s), gas compressor(s), and step-up transformer(s). Distance from the project fence lines to the turbine(s), gas compressor(s), and step-up transformer(s).	YES, 16. Noise Study and 16. Noise Map	YES	N/A	CRR-8

	YES	Proof of contract and contact information for the party who will do the installation, and a copy of their Injury and Illness Prevention Plan.	YES, 17. Contactor's Safety Plan and 17. Proof of Installation	YES	N/A	N/A
(a)(7) The owner or operator has received authorization to interconnect the power generator(s) to the distribution or transmission grid by the relevant grid authority.	YES	Documentation from the California Independent System Operator or Interconnecting Utility indicating preliminary approval of the interconnection of the additional generation. And, when available, provide the Federal Energy Regulatory Commission approved generator interconnection agreement or modified existing interconnection agreement for the emergency generators.	YES, 18. WAPA LOA (Funding Agrmt) CDWR Emergency Gen Project 18. WAPA LOA (Proj Agrmt)- CDWR Emergency Gen Project LOA 21-SNR-02610 21-SNR-02611	YES	N/A	N/A
(a)(8) The owner or operator will provide access to CEC for inspection of the power generating equipment and site, and provide all available documentation regarding the equipment and site as requested by the CEC.	YES	Statement of agreement that owner or operator will provide access to CEC for inspection and provide all available documentation requested by CEC.	YES, 1.19.20 Roseville Statement of Agreements	YES	N/A	CRR-9 CRR-10 CRR-11 CRR-14
(b) Within 10 days after an owner or operator files a self-certification, the Executive Director shall verify that the self-certification is complete and meets the requirements of section (a) and that, based on the information available at the time of review, the project will deliver net peak energy by October 31, 2021. The Executive Director shall file a decision on the self-certification granting or denying		N/A				

the license and may impose conditions or reporting requirements on the license as appropriate. The decision of the Executive Director is final and not subject to further consideration or appeal.						
(c) The owner or operator is authorized to operate the power generators up to 5 years from the date that the Executive Director grants the license.		N/A				
(d) To support the Emergency Proclamation's directive to the California Air Resources Board to develop and promptly implement a State-funded plan to mitigate the effects of additional emissions authorized by the Emergency Proclamation beyond permitted levels, all owners or operators of new and temporary power generators shall report emissions in excess of federal air permits to the CEC for transmittal to the California Air Resources Board.	YES	Statement of agreement that the owner or operator will report emissions data to the CEC.	YES, 1.19.20 Roseville Statement of Agreements	YES	N/A	CRR-12 CRR-13