

**DOCKETED**

<b>Docket Number:</b>	79-AFC-02C
<b>Project Title:</b>	NCPA/Shell Geothermal Project #2 (78-NOI-5) - Compliance
<b>TN #:</b>	240061
<b>Document Title:</b>	Petition to Amend (PTA) the Commission Decision - 230 kV Transmission Intertie Connection
<b>Description:</b>	Petition to Amend (PTA) the Commission Decision - Establishment of 230 kV Transmission Intertie Connection for NCPA-1 and NCPA-2
<b>Filer:</b>	Anwar Ali
<b>Organization:</b>	NCPA - Northern California Power Agency
<b>Submitter Role:</b>	Applicant
<b>Submission Date:</b>	10/13/2021 12:55:50 PM
<b>Docketed Date:</b>	10/13/2021



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September 27, 2021

Mr. Anwar Ali  
Compliance Project Manager  
Siting, Transmission and Environmental Protection Division  
Compliance Monitoring and Enforcement Office  
California Energy Commission  
1516 Ninth Street, MS-15  
Sacramento, CA 95814

**RE: PETITION TO AMEND NCPA GEOTHERMAL PROJECT NO. 2'S  
FINAL DECISION  
Docket Number 079-AFC-02C**

Dear Mr. Ali:

Pursuant to Section 1769 of the California Energy Commission (CEC) Siting Regulations, NCPA Geothermal Project NO. 2 (NCPA-2), hereby submits the attached Petition to amend the CEC's Final Decision approving the Application for Certification (AFC) for NCPA-2.

Please contact me at (707) 809-6017 if you have any questions regarding this submittal.

Sincerely,

Shaun Robinson  
Plant Engineer  
NCPA Geothermal

cc: Marc Pelletier  
Anthony Allegra  
Jane Luckhardt

## **PETITION FOR INSIGNIFICANT AMENDMENTS TO OPERATIONS CONDITIONS OF CERTIFICATION**

As required by Section 1769 of the CEC Siting Regulations, NCPA Geothermal Project #2 (NCPA-2) hereby submits the following discussion to amend the California Energy Commission's (CEC) Final Decision approving the Application for Certification (AFC) for the NCPA Geothermal Project #2. (Certification 079-AFC-02C) Here, in this Petition, NCPA-2 requests a necessary modification to the project description which will resolve transmission difficulties encountered by both NCPA-2 and NCPA-3.

### **INTRODUCTION**

In 2019 the Northern California Power Agency (NCPA) geothermal facility was impacted by the Kincadee wildfire and had lost the ability to fully output generation through its normally established transmission line connections. NCPA experienced the curtailment of approximately 98 MW of renewable, baseload, geothermal power to vulnerable communities during that event.

The purpose of this modification is to establish a 230kV intertie connection between the NCPA gen-tie transmission lines, NCPA #2 and NCPA #3. The 230kV intertie connection would allow NCPA-2 and NCPA-3 to generate onto whichever gen-tie line is available. The 230kV intertie will not parallel the lines or be used if the two transmission lines are energized concurrently. The modification will include the installation of a 230kV non-load break disconnect switch, in NCPA-2's switchyard. The modification will be engineered and designed by Professional Engineer licensed to perform in the State of California.

The proposed modification includes the relocation of the un-used NCPA Unit 3 230kV vertical break, gang-operated, manual disconnect switch that will be installed at NCPA-2's switchyard by a separate contractor, hired by NCPA. Additional items include structures required for adequate conductor alignment and clearance in the eventual switch installation design. NCPA will work with WAPA and agree on all aspects of the intertie switch installation prior to work commencement, following receipt of Engineer of Record's design.

**Pursuant to CCR Title 20, Section 1769 (a)(1)(A) and (B), a description of the proposed modifications, including new language for affected conditions and the necessity for the modifications is required.**

To mitigate the impact of PG&E 230kV transmission line outages used by the NCPA Geothermal Facility, a switch will be installed in the NCPA-2 switchyard. The installation of the switch will allow the ability for both NCPA-2 and NCPA-3 to export generation onto the same transmission line during operation. Reliability will be greatly improved by allowing the facility to export generation during a Lakeville or Fulton 230kV line outage.

**Pursuant to CCR Title 20, Section 1769 (a)(1)(C), a description of any new information or change in circumstances that necessitated the change is required.**

The installation of the intertie switch allows continued operation of both NCPA Geothermal Plants in the event of a wildfire, Public Safety Power Shutoff (PSPS), or other transmission line outage. These events are becoming more and more frequent and NCPA is trying to adapt to changing operational methodologies.

**Pursuant to CCR Title 20, 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 is required.**

The proposed changes to the project description does not result in any significant adverse environmental impact. During normal conditions, the NCPA Geothermal Facility will operate and export similar to past configurations and the existing project description including the Conditions of Certification (COC). The intertie switch will be installed on existing disturbed land within the existing NCPA-2 switchyard that is located within the NCPA-2 plant boundary.

**Pursuant to CCR Title 20, 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 is required.**

The proposed amendment will have no impact on the facility's ability to comply with applicable laws, ordinances, regulations, and standards. The NCPA Geothermal Facility will continue to meet all applicable Conditions of Certification. This proposed amendment will not require any changes to the Conditions of Certification.

**Pursuant to CCR Title 20, Section 1769 (a)(1)(F), a discussion of how the proposed change would affect the public is required.**

NCPA asserts that the proposed modification to the project description will not adversely affect the public.

**Pursuant to CCR Title 20, Section 1769 (a)(1)(G), a list of property owners potentially affected by the modification is required.**

The proposed amendment will not change the manner in which the NCPA Geothermal Facility is operated, therefore no property owners will be affected by the modification. The switchyard configuration change will only be on existing NCPA property. The NCPA Geothermal Facility is wholly surrounded by Bureau of Land Management (BLM) land.

**Pursuant to CCR Title 20, Section 1769 (a)(1)(H), a discussion of the potential effect of the proposed change on nearby property owners, residents, and the public is required.**

The proposed amendment will have no impact on property owners, residents, the public or any other parties.

**Pursuant to CCR Title 20, 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 is required.**

The project that is the subject of this requested amendment is exempt from CEQA under the CEQA Guidelines, 14 C.C.R §15301(b), under Class 1 minor alterations to publicly-owned utilities. This project will be completed entirely within an existing switchyard that itself is located entirely within an existing power plant boundary on disturbed land. This project simply allows electricity produced by geothermal plants to flow entirely on either generation tie line to the CAISO controlled grid when one transmission line is unavailable.

## **CONCLUSION**

Based on the forgoing analysis, NCPA respectfully requests the Commission approve this necessary modification to the project description which will resolve transmission difficulties encountered by the project.