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*Petition for Post-certification License
Amendment*

Temporary Simple Cycle Operation

for the

Cosumnes Power Plant

Sacramento, California

(01-AFC-19C)

Submitted to the:

California Energy Commission

Submitted by:

Sacramento Municipal Utility District Financing Authority

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With Assistance by:

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Acronyms and Abbreviations

AFC	Application for Certification
CCR	California Code of Regulations
CEC	California Energy Commission
CEQA	California Environmental Quality Act
COC	Condition of Certification
CPP	Cosumnes Power Plant
GHG	greenhouse gas
HRSG	heat recovery steam generator
LORS	laws, ordinances, regulations, and standards
SFA	Sacramento Municipal Utility District Financing Authority
SMUD	Sacramento Municipal Utility District

Executive Summary

The Sacramento Municipal Utility District (SMUD) Financing Authority (SFA) respectfully submits this petition to the California Energy Commission (CEC) for post-certification license modification for the Cosumnes Power Plant (CPP) (01-AFC-19C). This petition for post-certification license amendment (Petition to Amend) proposes to allow the simple cycle operation of the CPP combustion turbines due to a failed steam turbine generator stator bus bar, rendering the steam turbine generator inoperable. SFA proposes to continue to operate CPP in a simple-cycle configuration until the steam turbine generator is repaired. Due to supply chain issues, the repair is expected to be completed November 2022 to January 2023.

The proposed operation of the CPP combustion turbines in simple-cycle configuration will not require the physical alteration of the combustion turbines, heat recovery steam generators (HRSG), or air emission control systems. The combustion turbines and HRSG will continue to operate the same as before the steam turbine failure, but at lower than base load operating rates (the maximum expected 2 on 0 operating rate is estimated at 80 percent of base load). Steam generated in the HRSG will bypass the steam turbine generator and will be sent directly to the condenser. Out of an abundance of caution, SFA removed the low-pressure steam turbine rotor to eliminate the possibility of damaging the steam turbine. The operation of the CPP combustion turbines simple-cycle configuration is a technology modification and all other characteristics and operations of the project remain unchanged.

This Petition to Amend does not require any CEC Conditions of Certification to be modified at this time as no change in fuel consumption or air emissions are proposed. The environmental impacts assessment presented in Section 3.0 concludes that there will be no significant environmental impacts associated with the implementation of the actions specified in this Petition to Amend, and that the project will continue to comply with all applicable laws, ordinances, regulations, and standards.

Introduction

1.1 Background

The California Energy Commission (CEC or Commission) approved the Cosumnes Power Plant (CPP) project in September 2003 (CEC, 2003a). The project is located adjacent to the former Rancho Seco Nuclear Plant in southern Sacramento County. Submitted in September 2001, the Application for Certification (AFC) for the CPP analyzed the impacts associated with four General Electric (GE) Model 7241FA gas turbines exhausting into four unfired heat recovery steam generator (HRSG) units (01-AFC-19) (SMUD, 2001). The initial operation of Phase 1 of the CPP (two gas turbines, two HRSGs, one condensing steam turbine, one cooling tower) began in October 2005 and this phase of the project has been in commercial operation since February 2006.

The Sacramento Municipal Utility District (SMUD) Financing Authority (SFA) submitted a Petition to Amend the CEC license in November 2007. The purpose of the Amendment was to make the CPP project description and air quality Conditions of Certification (COC) consistent with the modified cooling tower specifications and operating parameters. The CEC approved that Petition to Amend in June 2008 (CEC, 2008).

SFA submitted a Petition to Amend in February 2009 to address increased total suspended and dissolved solids in the water supply. The CEC approved that Petition to Amend in April 2009 (CEC, 2009).

SFA submitted a Petition to Amend in December 2010 to allow the use of digester gas in the natural gas supply line serving CPP, refine the total dissolved solids levels in the cooling tower recirculation water to match the water filtration system's performance, and to remove the peak flow condition from the Conditions of Certification. The CEC approved that Petition to Amend in November 2011 (CEC, 2011).

SFA submitted a Petition to Amend in September 2018 to install upgraded advanced gas path components as part of a scheduled maintenance event. The CEC approved that Petition to Amend in January 2019 and the components were installed shortly thereafter (CEC, 2019).

This petition for post-certification license amendment (Petition to Amend) proposes to allow the simple cycle operation of the CPP combustion turbines due to a failed steam turbine generator stator bus bar, rendering the steam turbine generator inoperable. SFA proposes to continue to operate CPP in a simple-cycle configuration until the steam turbine generator is repaired. Due to supply chain issues, the repair is expected to be completed November 2022 to January 2023.

The proposed operation of the CPP combustion turbines in simple-cycle configuration will not require the physical alteration of the combustion turbines, heat recovery steam generators (HRSG), or air emission control systems. The combustion turbines and HRSG will continue to operate as before the steam turbine failure, but at lower than base load operating rates (the maximum expected 2 on 0 operating rate is estimated at 80 percent of

base load). Steam generated in the HRSG will bypass the steam turbine generator and go directly to the condenser. Out of an abundance of caution, SFA removed the low-pressure steam turbine rotor to eliminate the possibility of damaging the steam turbine. The operation of the CPP combustion turbines simple-cycle configuration is a technology modification and all other characteristics and operations of the project remain unchanged.

Detailed descriptions of the proposed modifications are included in Section 2.0. The potential environmental impacts associated with the proposed change are evaluated in Section 3.0.

This Petition to Amend contains the information required pursuant to the CEC's Siting Regulations (California Code of Regulations [CCR] Title 20, Section 1769, Post Certification Amendments and Changes). The information necessary to fulfill the requirements of Section 1769 is contained in Sections 1.0 through 6.0 as summarized in Table 1-1.

TABLE 1-1
Informational Requirements for Post-Certification Modifications

Section 1769 Requirement	Section of Petition Fulfilling Requirement
(A) A complete description of the proposed change, including new language for any conditions of certification that will be affected;	Section 2.0—Description of Proposed Amendments
(B) A discussion of the necessity for the proposed change and an explanation of why it should be permitted;	Section 1.3—Necessity of Proposed Changes
(C) A description of any new information or change in circumstances that necessitated the change;	Section 1.3—Necessity of Proposed Changes
(D) An analysis of the effects that the proposed change to project may have on the environment and proposed measures to mitigate any significant environmental effects;	Sections 3.0—Environmental Analysis of Proposed Amendments
(E) An analysis of how the proposed change would affect the project's compliance with applicable laws, ordinances, regulations, and standards;	Sections 1.4 and 3.0—Consistency of Changes with Certification and Environmental Analysis of Proposed Amendments
(F) A discussion of how the proposed change would affect the public;	Section 4.0—Potential Effects on the Public
(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;	Section 5.0—List of Property Owners
(H) A discussion of the potential effect of the proposed change on nearby property owners, residents, and the public; and	Section 6.0— Potential Effects on Property Owners, the Public, and Parties in the Proceeding
(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.	Section 7.0 – CEQA Exemptions

1.2 Ownership of the Facility Property

The CPP is owned and operated by the SFA.

1.3 Necessity of Proposed Changes

The CEC Siting Regulations require a discussion of the necessity for the proposed change and an explanation of why the change should be permitted, including a description of any new information or change in circumstances that necessitated the change (Title 20, CCR, Sections 1769 (a)(1)(B), and (C)). This Petition to Amend proposes no changes to any Conditions of Certification (COC).

The proposed changes are required due to a failed steam turbine generator stator bus bar, rendering the steam turbine generator inoperable. SFA proposes to continue to operate CPP in a simple-cycle configuration until the steam turbine generator is repaired. Due to supply chain issues, the repair is expected to be completed November 2022 to January 2023. The proposed change to simple cycle operation during the steam turbine generator outage is needed in order to continue generating electricity during the summer peak electrical period. In simple-cycle mode, CPP can generate electricity at a lower than base load operating rates (estimated at 80 percent of base load) which is critically needed during the summer peak electrical period to militate against system load vulnerability and instability for the SMUD service area.

1.4 Consistency of Changes with Certification

The CEC Siting Regulations also require an analysis of how the proposed change would affect the project's compliance with applicable laws, ordinances, regulations, and standards (LORS) (Title 20, CCR Section 1769 (a)(1)(E)). The proposed project operational modification is consistent with applicable LORS, as discussed in Section 3.0.

1.5 Summary of Environmental Impacts

The CEC Siting Regulations require an analysis of the effects that the proposed change to the project may have on the environment and propose measures to mitigate any significant environmental effects (Title 20, CCR, Section 1769 (a)(1)(D)). The regulations also require a discussion of the impact of the modification on the facility's ability to comply with applicable LORS (Section 1769 (1)(a)(E)). Section 3.0 of this Petition to Amend includes a discussion of the potential environmental effects associated with the modifications as well as a discussion of the consistency of the modification with LORS. Section 3.0 concludes that there will be no significant environmental impacts associated with implementing the actions specified in this Petition to Amend and that the project, as modified, will comply with all applicable LORS.

1.6 Conditions of Certification

This Petition to Amend proposes no changes to the COCs.

SECTION 2.0

Description of Proposed Amendments

This section includes a description of the proposed project modifications, consistent with CEC Siting Regulations (Title 20, CCR, Section 1769 (a)(1)(A)).

This Petition to Amend proposes to allow the simple cycle operation of the CPP combustion turbines due to a failed steam turbine generator stator bus bar, rendering the steam turbine generator inoperable. SFA proposes to continue to operate CPP in a simple-cycle configuration until the steam turbine generator is repaired. Due to supply chain issues, the repair is expected to be completed November 2022 to January 2023.

The proposed operation of the CPP combustion turbines in simple-cycle configuration will not require the physical alteration of the combustion turbines, heat recovery steam generators (HRSG), or air emission control systems. The combustion turbines and HRSG will continue to operate as they did prior to the steam turbine failure at lower than base load operating rates. The expected combustion turbine operating rate will be approximately 80 percent of base load. Steam generated in the HRSGs will bypass the steam turbine generator and will be sent directly to the condenser. Out of an abundance of caution, SFA removed the low-pressure steam turbine rotor to eliminate the possibility of damaging the steam turbine.

All proposed modifications would be associated with existing facilities at CPP and no excavation activities are required as part of this Petition to Amend. Furthermore, restoring the steam turbine generator to operational status will require contract maintenance workforce, in significantly smaller numbers than were required for the original project construction or other routine maintenance events at CPP.

SECTION 3.0

Environmental Analysis of Proposed Amendments

The change to CPP's operations does not change the conclusions reached during the original licensing of the facility, nor any of the approved Petitions to Amend. However, for completeness, a review of the impacts and LORS compliance is provided for all topic areas.

The following subsections present a discussion of the potential impacts that the proposed changes may have on the environmental analysis as presented in the Final Decision. Each discussion includes an environmental analysis, an assessment of compliance with applicable LORS, proposed mitigation measures, and, if applicable, proposed changes to the COCs that are necessary as a result of project modifications.

3.1 Air Quality and Greenhouse Gases

3.1.1 Environmental Baseline Information

This Petition to Amend does not require changes to the air quality or greenhouse gases (GHG) environmental baseline information as described in the Final Decision or approved Petitions to Amend.

3.1.2 Environmental Consequences

No construction air quality impacts are expected as a result of the proposed modification. The restoration of the steam turbine generator to an operational condition will require contract maintenance workforce, but in significantly smaller numbers than were required for the original project construction or other routine maintenance events.

The combustion turbines are capable of operating in simple cycle mode in compliance with applicable COCs and LORS. The emission control systems are not affected by the steam turbine generator outage or the fact that the combustion turbines will be operated at approximately 80 percent load during the simple cycle operation.

The simple cycle operation of the combustion turbines is not expected to result in any changes to the exhaust gas composition or temperature, nor will it affect the existing continuous emissions monitoring systems from precisely and accurately monitoring the exhaust gases for concentrations of oxides of nitrogen, carbon monoxide, and oxygen.

Operation of the CPP combustion turbines in simple cycle mode will result in an increase in GHG emissions on a pound per unit energy basis (either British thermal unit or megawatt). However, a review of the air quality COCs shows that the project does not have a GHG emission limitation. A review of the federal GHG regulations (Title 40, Code of Federal Regulations, Subpart TTTT - Standards of Performance for Greenhouse Gas Emissions For Electric Generating Units) is applicable to emission units installed after January 8, 2014. The CPP began commercial operation in February 2006 and is not subject to Subpart TTTT.

California adopted an emission performance standard (EPS), based on Senate Bill 1368, that limits the state's utilities from entering into long-term investment for base load power plants with GHG emissions that exceed those of a combined cycle combustion turbine project. SFA is not entering into a long-term investment into a power plant but is making repairs on a failed component at CPP. The proposed project will not increase generation capacity over design conditions, is not intended to extend the life of CPP, and is not intended to convert a non-base load plant into a base load plant. Therefore, EPS is not applicable to CPP.

3.1.3 Mitigation Measures

The proposed CPP modifications will not create a significant air quality or GHG impact and will not require additional mitigation measures.

3.1.4 Consistency with LORS

The simple cycle operation of CPP is expected to conform to applicable LORS related to air quality and GHGs.

3.1.5 Conditions of Certification

The proposed modification to the CPP operation does not require changes to the COCs for air quality or GHG.

3.2 Biological Resources

3.2.1 Environmental Baseline Information

This Petition to Amend does not require changes to the Biological Resources environmental baseline information as described in the AFC.

3.2.2 Environmental Consequences

The repair work proposed in this Petition to Amend is consistent with previous CPP maintenance outages and the proposed project will occur completely within the CPP site. Additionally, the change in CPP's combustion turbine operation will not result in an increase in criteria air pollutants. Therefore, no impacts to biological resources are expected.

3.2.3 Mitigation Measures

The proposed CPP modifications will not create a significant biological resource impact and will not require additional mitigation measures.

3.2.4 Consistency with LORS

The project conforms to applicable LORS related to biological resources.

3.2.5 Conditions of Certification

The proposed modification does not require changes to the COCs for biological resources.

3.3 Cultural Resources

3.3.1 Environmental Baseline Information

This Petition to Amend does not require changes to the cultural resources environmental baseline information as described in the AFC.

3.3.2 Environmental Consequences

The repair work proposed in this Petition to Amend is consistent with previous CPP maintenance outages and the proposed project will occur completely within the CPP site. No excavations or earth moving are expected and no project feature onsite is over 45 years old. Therefore, no impacts to cultural resources are expected.

3.3.3 Mitigation Measures

The proposed CPP modifications will not create a significant cultural resource impact and will not require additional mitigation measures.

3.3.4 Consistency with LORS

The project conforms to applicable LORS related to cultural resources.

3.3.5 Conditions of Certification

The proposed modification does not require changes to the COCs for cultural resources.

3.4 Geologic Hazards and Resources

3.4.1 Environmental Baseline Information

This Petition to Amend does not require changes to the geologic hazards and resources environmental baseline information as described in the AFC.

3.4.2 Environmental Consequences

The repair work proposed in this Petition to Amend will occur completely within the CPP site and requires no excavations, earth moving, or foundation installation. No additional geologic resources or geologic hazards have been identified in the project area. Therefore, no impacts to geologic hazards and resources are expected.

3.4.3 Mitigation Measures

The proposed modification will not create a significant impact to geologic resources, and new geologic hazards have not been identified that require additional mitigation measures.

3.4.4 Consistency with LORS

The project conforms to applicable LORS related to geologic hazards and resources.

3.4.5 Conditions of Certification

The proposed modification does not require changes to the COCs for geologic hazards and resources.

3.5 Hazardous Materials Handling

3.5.1 Environmental Baseline Information

This Petition to Amend does not require changes to the hazardous materials handling environmental baseline information as described in the AFC.

3.5.2 Environmental Consequences

The proposed CPP modifications will require the use of hazardous material during the steam turbine generation repair process. These may include coatings, lubricants, and welding materials. These hazardous materials are routinely handled, used, and stored onsite. Therefore, no impacts from hazardous materials handling are expected.

3.5.3 Mitigation Measures

The proposed CPP modification will not create a significant impact from hazardous materials handling that will require additional mitigation measures.

3.5.4 Consistency with LORS

The project conforms to applicable LORS related to hazardous materials handling.

3.5.5 Conditions of Certification

The proposed modification does not require changes to the COCs for hazardous materials handling.

3.6 Land Use

3.6.1 Environmental Baseline Information

This Petition to Amend does not require changes to the land use environmental baseline information as described in the AFC.

3.6.2 Environmental Consequences

The proposed CPP modifications do not result in additional project features being developed on the project site. All work is being performed on or within existing project equipment and will not be visible once completed. Furthermore, the proposed modifications are consistent with the existing land use and zoning. Therefore, no impacts to land use are expected.

3.6.3 Mitigation Measures

The proposed CPP modification will not create a significant impact to land use that requires additional mitigation measures.

3.6.4 Consistency with LORS

The project conforms to applicable LORS related to land use.

3.6.5 Conditions of Certification

The proposed modification does not require changes to the COCs for land use.

3.7 Noise and Vibration

3.7.1 Environmental Baseline Information

This Petition to Amend does not require changes to the noise and vibration environmental baseline information as described in the AFC.

3.7.2 Environmental Consequences

The repair of the steam turbine generator will be consistent with other routine maintenance events and will be performed consistent with COC Noise-6. Therefore, noise and vibration impacts are expected to be less than significant.

The operation of the CPP combustion turbines in simple cycle mode is not expected to result in higher noise or vibration impacts than those analyzed during the licensing of the facility. Therefore, no impacts to noise and vibration are expected.

3.7.3 Mitigation Measures

The proposed CPP modification will not create a significant impact to noise and vibration that requires additional mitigation measures.

3.7.4 Consistency with LORS

The project conforms to applicable LORS related to noise and vibration.

3.7.5 Conditions of Certification

The proposed modification does not require changes to the COCs for noise and vibration.

3.8 Paleontological Resources

3.8.1 Environmental Baseline Information

This Petition to Amend does not require changes to the paleontological resources environmental baseline information as described in the AFC.

3.8.2 Environmental Consequences

The repair work proposed in this Petition to Amend is consistent with previous CPP maintenance outages and the proposed project will occur completely within the CPP site. No excavations or earth moving are expected. Therefore, no impacts to paleontological resources are expected.

The operational change proposed in this condition does not include ground disturbance and is not expected to result in additional paleontological resources.

3.8.3 Mitigation Measures

The proposed CPP modification will not create a significant paleontological resource impact and will not require additional mitigation measures.

3.8.4 Consistency with LORS

The project conforms to applicable LORS related to paleontological resources.

3.8.5 Conditions of Certification

The proposed modification does not require changes to the COCs for paleontological resources.

3.9 Public Health

3.9.1 Environmental Baseline Information

This Petition to Amend does not require changes to the Public Health environmental baseline information as described in the AFC.

3.9.2 Environmental Consequences

The repair work proposed in this Petition to Amend is consistent with previous CPP maintenance outages and the proposed project will occur completely within the CPP site. Therefore, increase in construction public health impacts are not expected.

The proposed CPP modification does not result in an increase in fuel consumption or cooling tower operation. Therefore, no increase in toxic air contaminants is expected and no impacts to public health are expected.

3.9.3 Mitigation Measures

The proposed CPP modification will not create significant public health impacts and will not require additional mitigation measures.

3.9.4 Consistency with LORS

The project conforms to applicable LORS related to public health.

3.9.5 Conditions of Certification

The proposed modification does not require changes to the COCs for public health.

3.10 Socioeconomics

3.10.1 Environmental Baseline Information

This Petition to Amend does not require changes to the socioeconomic environmental baseline information as described in the AFC.

3.10.2 Environmental Consequences

The proposed repairs to the steam turbine generator will not result in significant expenditures, nor require a substantial maintenance workforce. Therefore, socioeconomic impact from the repair work is expected to be less than significant.

The proposed operation of the combustion turbines in simple cycle mode will not result in greater air, noise, water resources, or other environmental impacts. Therefore, the operational impacts to socioeconomics is expected to be less than significant.

3.10.3 Mitigation Measures

The proposed CPP modification will not create a significant, negative impact to socioeconomics that requires additional mitigation measures.

3.10.4 Consistency with LORS

The project conforms to applicable LORS related to socioeconomics.

3.10.5 Conditions of Certification

The Commission Decision did not include COCs for socioeconomics.

3.11 Soils and Agriculture

3.11.1 Environmental Baseline Information

This Petition to Amend does not require changes to the soils and agricultural environmental baseline information as described in the AFC.

3.11.2 Environmental Consequences

The proposed CPP modification does not result in any ground disturbance or excavations and occur entirely within the developed project site. Therefore, no impacts to soils or agriculture are expected.

The proposed operation of the combustion turbines in simple cycle mode will not result in ground disturbance. Therefore, the operational impacts to soils and agricultural is expected to be less than significant.

3.11.3 Mitigation Measures

The proposed CPP modification will not create a significant impact to soils or agriculture that requires additional mitigation measures.

3.11.4 Consistency with LORS

The project conforms to applicable LORS related to soils and agriculture.

3.11.5 Conditions of Certification

The proposed modification does not require changes to the COCs for soils and agriculture.

3.12 Traffic and Transportation

3.12.1 Environmental Baseline Information

This Petition to Amend does not require changes to the traffic and transportation environmental baseline information as described in the AFC.

3.12.2 Environmental Consequences

As stated previously, SFA conducts routine maintenance activities with the same level of workforce and truck deliveries as will be required to repair the steam turbine generator. Therefore, the proposed modification is not expected to result in a significant traffic or transportation impact.

The proposed operation of the combustion turbines in simple cycle mode will not result in additional vehicle trips to the site. Therefore, the operational impacts to traffic and transportation are expected to be less than significant.

3.12.3 Mitigation Measures

The proposed CPP modification will not create a significant impact to traffic or transportation that requires additional mitigation measures.

3.12.4 Consistency with LORS

The project conforms to applicable LORS related to traffic and transportation.

3.12.5 Conditions of Certification

The proposed modification does not require changes to the COCs for traffic and transportation.

3.13 Visual Resources

3.13.1 Environmental Baseline Information

This Petition to Amend does not require changes to the visual resources environmental baseline information as described in the AFC.

3.13.2 Environmental Consequences

The repair of the steam turbine generator will not be visible to the public. Therefore, visual resource impacts are not expected.

Operation of the combustion turbines in simple cycle mode are not expected to result in any changes to the exhaust stack or cooling tower visible plumes. Therefore, no visual impacts are expected.

3.13.3 Mitigation Measures

The proposed CPP modifications will not create a significant impact to visual resources that requires additional mitigation measures.

3.13.4 Consistency with LORS

The project conforms to applicable LORS related to visual resources.

3.13.5 Conditions of Certification

The proposed modification does not require changes to the COCs for visual resources.

3.14 Waste Management

3.14.1 Environmental Baseline Information

This Petition to Amend does not require changes to the waste management environmental baseline information as described in the AFC.

3.14.2 Environmental Consequences

The proposed CPP modification does not result in an increase in hazardous materials use or waste generation at the site, beyond the normal construction waste generated during a maintenance outage. Therefore, no impacts to waste management are expected.

The proposed operation of the combustion turbines in simple cycle mode will not result in the generation of additional waste. Therefore, the operational impacts to waste management are expected to be less than significant.

3.14.3 Mitigation Measures

The proposed CPP modifications will not create a significant waste management impact and will not require additional mitigation measures.

3.14.4 Consistency with LORS

The project conforms to applicable LORS related to waste management.

3.14.5 Conditions of Certification

The proposed modification does not require changes to the COCs for waste management.

3.15 Water Resources

3.15.1 Environmental Baseline Information

This Petition to Amend does not require changes to the water resources environmental baseline information as described in the Final Decision or approved Petitions to Amend.

3.15.2 Environmental Consequences

The proposed CPP modifications will not result in an increase in water use during the repair work or simple cycle operation and will not alter storm water drainage onsite. Therefore, no impacts to water resources are expected.

3.15.3 Mitigation Measures

The CPP impacts on water resources with the proposed modifications are less than significant, and therefore, will not require additional mitigation measures.

3.15.4 Consistency with LORS

The project conforms to applicable LORS related to water resources.

3.15.5 Conditions of Certification

The proposed modification does not require changes to the COCs for water resources.

SECTION 4.0

Potential Effects on the Public

This section discusses the potential effects on the public that may result from the modifications proposed in this Petition to Amend, in accordance with CEC Siting Regulations (Title 20, CCR, Section 1769(a)(1)(F)).

With the implementation of the modifications proposed, the project would have no adverse effect on the public. As previously mentioned, the construction activity associated with the modifications is consistent with routine maintenance occurring periodically on the project site. Therefore, no adverse effects on the public will occur because of the changes to the project as proposed in this Petition to Amend. The proposed modifications will in fact benefit the public through continued support of local and system grid reliability needs during the critical peak summer months.

SECTION 5.0

List of Property Owners

This section lists the property owners in accordance with the CEC Siting Regulations (Title 20, CCR, Section 1769(a)(1)(G)). As the proposed change is limited to the project site, no project linears will be impacted. The property owners whose property is located within 1,000 feet of CPP are provided under separate cover.

SECTION 6.0

Potential Effects on Property Owners, the Public, and Parties in the Proceeding

This section addresses potential effects of the project changes proposed in this Petition to Amend on nearby property owners, residents, and the public, in accordance with CEC Siting Regulations (Title 20, CCR, Section 1769 (a)(1)(H)).

The project as modified will not differ significantly in potential effects on adjacent landowners, compared with the project as previously certified. As previously mentioned, the repair activity is consistent with other routine maintenance occurring onsite, and the impacts are less than significant. The project, therefore, would have no adverse effects on nearby property owners, residents, or the public.

SECTION 7.0

CEQA Exemptions

SFA is the lead agency responsible for complying with the provisions of CEQA. (14 CCR § 15040). As lead agency for compliance with CEQA requirements, SFA finds that this Petition to Amend and the proposed changes would be implemented without causing a significant adverse impact on the environment.

The proposed modifications are categorically exempt pursuant to Title 14, Section 15301 of the California Code of Regulations as a minor alteration to an existing facility. The proposed modifications are also categorically exempt pursuant to Title 14, Section 15302(c) of the California Code of Regulations as “replacements or reconstruction of existing utility systems and/or facilities involving negligible or no expansion of capacity.” In addition, the proposed change is also categorically exempt from CEQA pursuant to Section 15061(b)(3), the “Common Sense Exemption.” This exemption provides that “[w]here it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA.” (14 CCR § 15061(b)(3).) Therefore, the proposed modifications are categorically exempt from CEQA pursuant to the “Common Sense Exemption.”

SECTION 8.0

References

Sacramento Municipal Utility District (SMUD). 2001. Application for Certification for the Cosumnes Power Plant. Submitted to the California Energy Commission. September.

CEC. 2003b. Final Staff Assessment for the Cosumnes Power Plant, Part 1. California Energy Commission, Sacramento, California. February.

CEC. 2008. Order to Amend the Energy Commission Decision to Change Three Air Quality Conditions of Certification and Project Description for the Cosumnes Power Plant. June.

CEC. 2009. Approval of Modification to Upgrade the Zero Liquid Discharge System for the Cosumnes Power Plant. April 16.

CEC. 2011. ORDER APPROVING a Petition to Modify the Fuel Supply and other Modifications to the SMUD Cosumnes Power Project. November 2011

CEC. 2019. Cosumnes Power Plant Order Approving Petition to Amend. January 2019