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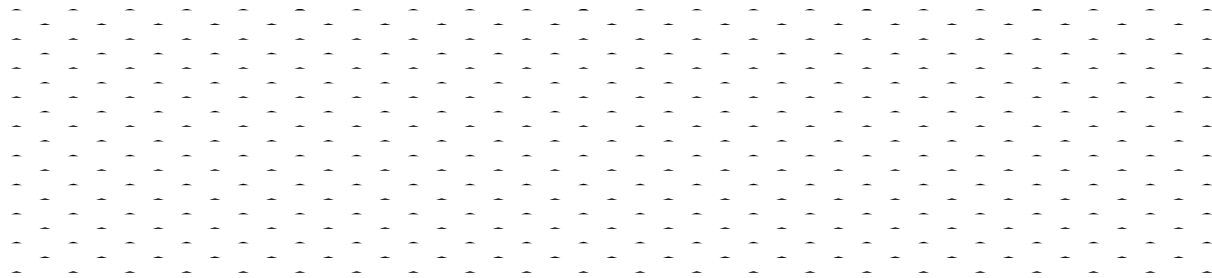
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**Addendum to the
December 26, 2023 Petition for
Modification
2015 Amendment to the Large Generator
Interconnection Agreement**

**Mojave Solar Project
(09-AFC-05C)**

**Submitted by
Mojave Solar, LLC**

September 25, 2024



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1 Summary

Mojave Solar LLC (“Project Owner”) is providing this addendum to the Post Certification Changes in Project Design, Operation or Performance and Amendments to the Commission Decision, which was filed in three parts on December 26, 2023 for the Mojave Solar Project (MSP).¹ The pending December 26, 2023 Petition to Amend (PTA) seeks the California Energy Commission’s (Commission or CEC) approval to construct two new permanent surface impoundments (or evaporation ponds), which are needed to address reduced evaporation rates at the existing ponds.

This addendum is filed at CEC’s staff direction to update the docket regarding a 2015 Large Generator Interconnection Agreement (LGIA) Amendment that increased the maximum interconnection allowance at MSP’s Point of Interconnection by 25 megawatts (MW) as an Energy Only addition. While the amendment to the LGIA did not result in any physical changes to the project, it provides updated information relevant to the project description in the original MSP Commission Decision.² Based on the Project Owner’s discussions with Commission Staff, the LGIA Amendment must be reflected in MSP’s CEC certification materials, and therefore the Project Owner is submitting this addendum to the PTA, even though the MSP believes the LGIA amendment was already disclosed to the CPM in 2012 during construction.

This addendum to the PTA addresses the requirements of Section 1769 of the California Energy Commission’s Siting Regulations. As discussed below, this amendment has been long recognized in the various state determinations of available generating capacity, some of which are maintained by the CEC itself. The LGIA did not include any physical change to the project or the interconnection and transmission facilities. The LGIA amendment does not present significant environmental effects and MSP continues to comply with applicable laws, ordinances, regulations, and standards (LORS).

2 Description of the Proposed Change and Including New Language for Any Conditions of Certification that will be Affected.

Like many plants studied by the CEC, the nominal rating studied during the AFC process does not perfectly match the as-built generating capability under all conditions. The Mojave Solar Project was studied as a concentrated solar project with a combined nominal electrical output of 250 megawatts from two independently operated solar fields, each feeding a nominal 125 MW power island. The Commission Decision reflects the “nominal” capability of MSP’s two generating units. The term “nominal” is defined in the Websters dictionary to mean “of, being or relating to a designated or theoretical size that may vary from the actual:

¹ TN Nos. 253750, 253751, and 253752.

² Abengoa Mojave Solar Project Commission Decision, September 2010, CEC-800-2010-008-CMP, Doc. No. 9-AFC-5.

approximate.” Even though the MSP project description is technically accurate under a plain reading of the Decision, MSP nevertheless offers the following information concerning the LGIA amendment.

In November 2015, the Standard Large Generator Interconnection Agreement among Southern California Edison Company (SCE), the California Independent System Operator (CAISO), and the Project Owner was amended (Amended LGIA).³ The Amended LGIA results from Project Owner’s as-permitted and as-built project being able to operate at PMax greater than 250 MW,⁴ and the as-permitted and as-built interconnection facilities were able to accommodate a higher maximum interconnection allowance than what was contemplated in the original LGIA. The 25 MW increase in interconnection allowance is not the result of changes to the generating equipment or installation of additional generating equipment originally studied and approved by CAISO and SCE for the 2011 LGIA, and it does not represent any change to project design considered by the Commission Decision or subsequent amendments thereto. No additional interconnection facilities, distribution upgrades or network upgrades were required to accommodate the 25 MW interconnection allowance increase.

With this addendum to the PTA, the Project Owner provides information so the CEC can evaluate whether the CEC should change the “nominal” determination in the original decision to reflect the as-built project design. This additional information does not require, and the project owner does not request, any changes to project design, project operation or performance requirements, or to any of the Conditions of Certification.

3 A discussion of the Necessity for the Proposed Change and an Explanation of Why the Change should be Permitted.

This addendum to the PTA provides additional information regarding the maximum allowable interconnection capability of MSP, and updates the project description in the Commission’s Decision. While we do not believe any change is necessary since the project description is based on a “nominal” capability figure, we nevertheless provide this documentation to supplement the Commission’s records regarding the maximum interconnection capability of MSP.

³ The amended LGIA is available via the Federal Energy Regulatory Commission’s eLibrary portal, <https://elibrary.ferc.gov/eLibrary/search>, in Docket No. ER-15-2718, file date Sept. 25, 2015, with description “Southern California Edison Company submits tariff filing per 35.13(a)(2)(iii: Amended LGIA with Mojave Solar LLC to be effective 9/26/2015.”

⁴ See CASIO Tariff, Appendix A, version dated July 26, 2024, defining PMax as “[t]he maximum normal capability of the Generating Unit, as measured at the Point of Interconnection or Point of Delivery, as applicable. PMax may not exceed the Interconnection Service Capacity, as documented in the Interconnection Study or Generator Interconnection Agreement.”

4 A description of any new information or change in circumstances that necessitated the change.

As described in Section 2, above, this change is responsive to a revision of the maximum interconnection Energy Only addition of 25 MW,⁵ as reflected in the Amended LGIA.

5 A discussion of how the proposed change would affect the environment and proposed measures to mitigate any significant environmental effects.

The proposed change will have no adverse change to the environment. As described the net capability increase of 25 MW was the result of a determination that the two generating units previously studied as part of the original LGIA were capable of a higher maximum net output at times of the year. This was not the result of any change to the project and did not require any additional interconnection facilities, distribution upgrades or network upgrades to accommodate the interconnection capability increase.

Thus, this addendum to the PTA presents no adverse change to the environment as no physical modifications were caused by or resulted from the interconnection capability increase permitted by the Amended LGIA. Additionally, the interconnection capability increase does not represent any change in operations of the facility considered in the Commission Decision. The increased interconnection capability is not associated with a change in emissions from the project, and does not necessitate a change to MSP's Mojave Air Quality Manage District issued permit.

Further, the change to the LGIA does not result in higher water use or water discharge to the evaporation ponds. The additional transmission capability increase of 25 MW allows the facility to produce the originally-planned annual energy while having typical planned and unplanned outages.

6 Impacts the Modification May Have on the Facilities' Ability to Comply with Applicable Laws, Ordinances, Regulations and Standards

The LGIA Amendment does not impact the Project's ability to comply with all applicable LORS.

⁵ See CASIO Tariff, Appendix A, version dated July 26, 2024, defining Energy Only Deliverability Status as "A condition elected by an Interconnection Customer for a Generating Facility interconnected with the CAISO Controlled Grid the result of which is that the Interconnection Customer is responsible only for the costs of Reliability Network Upgrades and is not responsible for the costs of Delivery Network Upgrades, but the Generating Facility will be deemed to have a Net Qualifying Capacity of zero, and, therefore, cannot be considered to be a Resource Adequacy Resource."

7 How the Proposed Modification Affects the Public

The proposed change has no effect on the public.

8 A Discussion of the Potential Effect of the Proposed Change on Nearby Property Owners, Residents, and the Public.

The proposed change has no potential effect on nearby property owners, residents, or the public. The closest properties are between 460 feet and 3,510 feet from the plant. The minor increase in interconnection capability, as reflected in the LGIA Amendment, does not impact proximate or distant property owners.

9 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.

The Project Owner can provide a list of property owners within these distances upon request.

10 Applicable Exemptions from the California Environmental Quality Act

This update to the project description is categorically exempt pursuant to the "common sense" exemption test, found in Title 14, Section 15061 of the California Environmental Quality Act regulations. This exemption should apply as the proposed change has no potential for causing a significant effect on the environment.