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| Project Title: | Sonoran Energy Project (formerly Blythe Energy Project Phase II) - Compliance | |
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| Filer: | Mary Dyas | |
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Memorandum

Date: September 21, 2015 Telephone: (916) 651-8891

File: 02-AFC-1C

To: Commissioner Janea A. Scott, Presiding Member Commissioner Karen Douglas, Associate Member Hearing Officer, Raoul Renaud

From: California Energy Commission -

1516 Ninth Street

Sacramento, CA 95814-5512

Mary Dyas

Compliance Project Manager

SUBJECT: SONORAN ENERGY PROJECT (02-AFC-1C) – PETITION TO AMEND ISSUES IDENTIFICATION AND SCOPING REPORT

Attached is staff's Issues Identification and Scoping Report for the Sonoran Energy Project (formerly the Blythe Energy Project Phase II) Petition to Amend. This report is a preliminary scoping document that identifies issues that the California Energy Commission staff believe will require careful attention and consideration or could cause delay in processing the Petition to Amend. This report also provides a proposed schedule. Energy Commission staff will present the Issues Identification and Scoping Report at the Informational Hearing and Site Visit to be held on Monday, September 28, 2015.

cc: Docket (02-AFC-1C)
Proof of Service List

Attachment: (1) Issues Identification and Scoping Report

SONORAN ENERGY PROJECT AMENDMENT

(02-AFC-1C)

ISSUES IDENTIFICATION AND SCOPING REPORT

CALIFORNIA ENERGY COMMISSION

Siting, Transmission and Environmental Protection Division

SONORAN ENERGY PROJECT AMENDMENT

(02-AFC-1C)

ISSUES IDENTIFICATION AND SCOPING REPORT

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ISSUES IDENTIFICATION AND SCOPING REPORT

This report has been prepared by the California Energy Commission (Energy Commission) staff to inform the Sonoran Energy Project (02-AFC-1C) Petition to Amend (PTA) Committee and all interested parties of the potential issues that have been identified in the review of the PTA thus far as well as the expected scope of staff's assessment and staff's proposed schedule for the proceeding. The issues and scope of analyses have been determined during staff's review of the Sonoran Energy Project PTA and as a result of discussions with federal, state, and local agencies. Staff will continue to address these issues and inform the Committee about progress made towards their resolution by submitting status reports in the time and manner ordered by the Committee.

AMENDMENT PROCESS

The Sonoran Energy Project (Sonoran) PTA will be processed as an amendment to the approved Blythe Energy Project Phase II (BEPII) Final Decision that was certified by the Energy Commission on December 14, 2005. The purpose of the Energy Commission's review process is to assess the impacts of this proposal on environmental quality and on public health and safety. The review process includes an evaluation of the consistency of the proposed changes with the Energy Commission's Decision and a determination on whether the project, as modified, will remain in compliance with applicable laws, ordinances, regulations, and standards (Title 20, Calif. Code of Regulations, section 1769).

PROJECT DESCRIPTION

Project Location & Site Description

The Sonoran project site is located within the city of Blythe, approximately five miles west of the city center, in eastern Riverside County. The project site boundary is located on an approximately 76-acre site immediately adjacent to the operational Blythe Energy Project (BEPI) which is owned by Blythe Energy Inc. and operated by AltaGas Blythe Operations Inc.

The project site is located approximately 1 mile due east of the Blythe Airport, which is currently owned and operated by Riverside County. The project site is on an intermediate plateau, about 70 feet in elevation above and west of the Colorado River Valley and the city of Blythe and about 60 feet below the elevation and east of the Blythe Airport. The topography of the project site is flat. The site slopes from an elevation of 350 feet above mean sea level (AMSL) in the northern portion of the parcel to 340 feet AMSL in the southern portion. The site is bound to the north by Riverside

¹ The first modification proposed in the Sonoran Energy Project Petition to Amend is to change the name of the project from Blythe Energy Project Phase II to the Sonoran Energy Project. Hereinafter, in this document, the Blythe Energy Project Phase II will be referred to as Sonoran Energy Project.

Avenue, to the east by the existing BEPI, and to the south by Hobsonway. The site is fenced, sparsely vegetated, and relatively flat.

Project Background

In December 2005, the Energy Commission granted a license to Caithness Blythe II, LLC, to construct the nominal 520 megawatt (MW) combined-cycle BEPII. The facility would consist of:

- An electrical interconnection to the Buck Boulevard Substation, located in the northeastern corner of the existing Blythe Energy Project (99-AFC-8C) site;
- Two Siemens Westinghouse V84.3a 170 MW combustion turbine generators;
- One 180 MW steam turbine generator;
- One 11-cell wet cooling tower, and
- Supporting equipment.

In April 2012, an amendment to the 2005 BEPII license was approved. The modified BEPII would be a nominal 569 MW combined-cycle facility. The changes included the following:

- A new point of electrical interconnection via a 2,100 foot-long 500 kilovolt transmission line into the proposed Desert Southwest Transmission Project's Keim substation;
- Replacement of the Siemens Westinghouse V84.3a turbines with fast-start Siemens SGT6-5000F turbines;
- Modification of the combustion turbine and steam turbine enclosure;
- Incorporation of an auxiliary boiler to allow fast start technology;
- Increase in size of cooling tower by 1,020 square feet; and
- Optimization of the General Arrangement.

Concurrently, in April 2012, a five-year extension of the Deadline for the Start of Construction, from December 14, 2011 to December 14, 2016, was approved.

Ownership of the BEPII changed in 2014, from Caithness Blythe II, LLC to AltaGas Sonoran Energy Inc. (AltaGas).

On August 7, 2015, AltaGas filed a Petition to Amend with the Energy Commission requesting to modify the approved BEPII Final Decision. The PTA can be found on the Energy Commission's webpage at: http://www.energy.ca.gov/sitingcases/sonoran/.

Description of Proposed Modification

AltaGas proposes to make substantial changes to the BEPII. The first modification proposed in the Sonoran Energy Project Petition to Amend is to change the name of the project from Blythe Energy Project Phase II to the Sonoran Energy Project. The

proposed name change is to reduce potential confusion associated with the number of generating projects in the area using the name "Blythe."

Other modifications proposed in this Petition to Amend include the following:

- Define a new point of electrical interconnection via a new 1,320-foot, 161-kV transmission line that will go from Sonoran project to the existing Buck Boulevard 161-kV substation on the existing BEPI site. From there, the new 161-kV Gen-Tie will deliver energy to the Western Area Power Administration's 161-kV Blythe substation, via an existing 161-kV Buck–Blythe transmission line.
- Replace the two Siemens SGT6-5000F combustion turbines with a single, more efficient General Electric (GE) Frame 7HA.02 combustion turbine;
- Replace the Siemens steam turbine generator (STG) with a more efficient singleshaft GE D652 STG;
- Increase the size of the auxiliary boiler to support GE's rapid response fast start capability;
- Decrease the size of cooling tower from an 11-cell to a 10-cell tower in response to the reduced heat rejection requirements;
- Decrease the size of the emergency diesel fire pump engine; and
- Optimize the general arrangement.

Sonoran_would be a natural gas-fired, water-cooled, combined-cycle, 553 MW net electrical generating facility

Construction Schedule

If approved, construction of Sonoran is scheduled to occur from the 2nd quarter of 2016 through the 2nd quarter of 2018. Final engineering is scheduled for the first half of 2016 (6 months) with site mobilization scheduled to start during the 2nd quarter of 2016. Construction is scheduled to be complete in the 2nd quarter of 2018 (approximately 26 months, including 4 months of commissioning).

SCOPE OF STAFF ANALYSIS

Based upon staff's initial review of the Petition to Amend, staff in each technical area will do one of the following:

Confirm adequacy of current analysis – Staff will evaluate the proposed modifications in the petition to amend against the current approved project to determine that there is no change in impacts/mitigation between then and now.

Update Current Analysis – Staff will look at changes since the project was approved and update certain areas of the analysis. Example: cumulative impacts.

Prepare New Analysis of Proposed Changes –Staff will be preparing a full analysis to address the proposed project changes.

Staff proposes the following scope of analysis for each technical area. The level of analysis in each technical area will be commensurate to the changes proposed in the amendment.

LORS Conformance – Staff will review applicable laws, ordinances, regulations and standards to determine if the project as amended will be in conformance with any new or revised LORS.

Review of Amendment – Staff will review the proposed changes and determine if additional data and analysis is required beyond the analysis, impacts, mitigation and conditions of certification in the Commission Decision.

Development of Data Requests – Staff will develop Data Requests if they require additional information to supplement the environmental analysis of the proposed changes pursuant to Title 20, California Code of Regulations, Section 1769(a)(1)(E).

Analysis and Preparation of Preliminary Staff Assessment (PSA) – Staff will prepare a preliminary assessment that addresses what, if any, additional analysis is needed to address the proposed changes to the project.

Respond to Comments – Staff will respond to substantive comments received from interested parties on the PSA.

Preparation of Final Staff Assessment – Staff will make appropriate changes to the PSA and finalize its analysis in the Final Staff Assessment (FSA).

Evidentiary Hearings – Staff will participate in hearings as required by the Committee.

Review and Comment on Presiding Member's Proposed Decision – As appropriate, staff will review and comment on the Presiding Member's Proposed Decision.

Contribute to Staff Briefs – As appropriate, staff will contribute to Staff Briefs prepared by legal counsel.

POTENTIAL MAJOR ISSUES

This portion of the report contains a discussion of the potential major issues that staff has identified to date. Discovery is currently under way. The Committee should be aware that this report may not include all of the significant issues that may arise during the case, and other parties have not had an opportunity to identify their concerns. The identification of the potential issues contained in this report is based on staff's review of the petition to amend and staff's judgment of whether any of the following circumstances could occur:

- Potential significant impacts that may be difficult to mitigate;
- Potential areas of noncompliance with applicable laws, ordinances, regulations, or standards (LORS);
- Areas of conflict between the parties; or
- Areas where resolution may be difficult or may affect the schedule.

The following table lists all the PTA subject areas evaluated and notes those areas where potential major issues have been identified, the scope of analysis and whether requests will/have been prepared. Although most technical areas are identified as having no potential issues, it does not mean that an issue will not arise in the future. In addition, disagreements regarding the appropriate conditions of certification may arise between staff and project owner that would require discussion at workshops and potentially during subsequent hearings.

| Subject Area | Major Issues | Scope of Analysis | Data Requests |
|------------------------------|-----------------|---|------------------|
| Air Quality | No | New Analysis of Proposed Changes | No |
| Alternatives | No | Confirm adequacy of current analysis | No |
| Biological Resources | No | Review any new survey data and confirm adequacy of current analysis | Yes |
| Cultural Resources | No | Review any new survey data and confirm adequacy of current analysis | No |
| Efficiency and Reliability | No | New Analysis of Proposed Changes | No |
| Facility Design | No | New Analysis of Proposed Changes | No |
| Geological Hazards | No | Confirm adequacy of current analysis | No |
| Hazardous Materials Handling | No | Confirm adequacy of current analysis | Yes |
| Land Use | No | Confirm adequacy of current analysis | No |
| Noise and Vibration | No | Confirm adequacy of current analysis | No |
| Paleontological Resources | No | Confirm adequacy of current analysis | No |
| Project Description | No | N/A | No |
| Public Health | No | New Analysis of Proposed Changes | No |

| Subject Area | Major Issues | Scope of Analysis | Data Requests |
|-------------------------------------|-----------------|--------------------------------------|------------------|
| Socioeconomics | No | Update Current Analysis | Yes |
| Soil and Water Resources | Yes | New Analysis of Proposed Changes | Yes |
| Traffic and Transportation | Yes | New Analysis of Proposed Changes | Yes |
| Transmission Line Safety & Nuisance | No | Confirm adequacy of current analysis | No |
| Transmission System Engineering | Yes | New Analysis of Proposed Changes | Yes |
| Visual Resources | No | New Analysis of Proposed Changes | Yes |
| Waste Management | No | Confirm adequacy of current analysis | No |
| Fire Protection & Worker Safety | No | Confirm adequacy of current analysis | No |

This report will not limit the scope of staff's analysis throughout this proceeding, but it acts to aid in the analysis of the potentially significant issues that the Sonoran Energy Project Amendment proposal poses. The following discussion summarizes the potential Soil and Water Resources, Traffic and Transportation, and Transmission System Engineering issues, identifies the parties needed to resolve the issues, and suggests a process for achieving resolution. At this time, staff does not see these potential issues as non-resolvable.

SOIL AND WATER RESOURCES

Background and Major Issue

Water Supply

The project is licensed to use up to 2,800 acre-feet per year (AFY) from the Palo Verde Mesa groundwater basin for operation through Condition of Certification **WATER RES - 4**.² At the time of the original license, the Commission found that the "BEP II groundwater pumping does not cause a significant project or cumulative impact under the California Environmental Quality Act, in the context of the use of groundwater." However, since the original license, the environmental conditions have changed. The Palo Verde Mesa groundwater basin is now over allocated. California and the western United States are in an unprecedented drought that is having an impact on groundwater basin recharge and flows in the Colorado River. Even prior to the drought, the balance of groundwater in the Palo Verde Groundwater Basin was tenuous and had to be carefully managed to maintain flows in the Colorado River. Meanwhile, several

² For this project, the traditionally configured **Soil and Water Resources** was split into two sections – **Water Resources** and **Water Quality & Soils**.

new and proposed power plants have or will be constructed in the area that use dry cooling and other technologies that minimize water use. Staff believes the proposed water use for this project could also preclude the development of other water efficient projects in the basin because of the disproportionate commitment of the tenuous water supply under the current license.

The environmental assessment for the Blythe Mesa Solar Project published by the Bureau of Land Management in March 2015 includes a Water Supply Assessment (WSA) that shows that the mesa basin is over allocated by 2,111 AFY. That is, the current outflows exceed inflows by 2,111 AFY. This budget does not account for the additional use that would be required by the Sonoran project, 2,800 AFY. If the Sonoran use was included in this WSA, the balance would be a negative 4,911 AFY. Additionally, staff has found other recent data that should be included in an updated budget that could further exacerbate the shortfall. Overdraft in the Palo Verde Mesa could result in a new draw from the adjacent Palo Verde Valley groundwater basin since they are hydraulically connected. Any additional draw from the Palo Verde Valley or its irrigation canals would also reduce outflow to the Colorado River.

Groundwater use by the Sonoran project would create a new and significant direct environmental impact to the Palo Verde Mesa groundwater basin. The Sonoran project would also therefore create a new indirect and adverse environmental impact to the Colorado River.

Further, the proposed groundwater use is not consistent with the Energy Commission's water policy regarding fresh water use for power plant cooling. Alternatives to potable water have advanced significantly and have already been implemented locally, suggesting that the technology choices should be revisited in the PTA assessment. Combined-cycle gas turbine plants are under construction at the existing Exelon sites of Wolf Hollow, which is near Dallas, and Colorado Bend, which is near Houston, using the same Sonoran proposed GE 7HA.02 combustion turbine, but with air cooled condensers (i.e., "dry cooling").

Early on in the development of the Ivanpah Solar Electric Generating System, licensed September 2010, the project owner of that project acknowledged the Energy Commission 2003 water policy and proposed the use of dry cooling recognizing the need to minimize the use of freshwater in a desert environment where water supply is a constrained resource. The Genesis Solar Energy Project (GSEP) (October 2010) initially proposed wet cooling with groundwater from the Chuckwalla Valley Basin which is hydraulically connected to the Palo Verde Mesa Groundwater basin to the east. Staff concluded the proposed use of groundwater would impact the Colorado River and was not consistent with Energy Commission water policy. Staff subsequently conducted a rigorous analysis of feasible alternatives that was time consuming and resulted in extended discussions of technical and policy issues during hearings. The GSEP project owner finally decided after these discussions and testimony that they would change the project design and use dry cooling.

The Sonoran project would use water with about 1,000 mg/L total dissolved solids (TDS) and chloride concentration of 280 milligrams per liter (mg/L), which the project owner believes is of such poor quality that it can be used for wet cooling. The petitioner states that since the water quality is brackish in accordance with Water Quality Control Policy 75-58, the water is not suitable for industrial purposes. Staff does not agree with this contention and believes this is good quality water, protected by the State Water Resources Control Board Drinking Water Policy (Resolution No. 88-63, revised as Resolution No. 2006-0008) as a potential drinking water supply, which is more recent policy that staff must also consider when analyzing project water supply. In addition, as stated in Water Quality Control Policy 75-58, even if the water quality does meet these criteria, the policy does not intend to imply that such water is no longer suitable for industrial purposes. Staff must consider all factors unique to a specific case at the time it is analyzed. Staff is also concerned that based on the PTA it appears the water quality may have changed since implementation of BEPI. As the petitioner points out, during the licensing of the BEPI project, the chloride concentrations were about 200 mg/L and have increased to 280 mg/L. A change of this magnitude in this time period is significant in water quality terms and may suggest current groundwater use in the area is degrading water quality.

For comparison purposes staff points out that GSEP was proposing to use much poorer quality water than is being proposed by the Sonoran project. The second quarter 2015 groundwater quality report from GSEP indicates that the produced water ranges from 2,000 to 3,000 mg/L TDS. The Sonoran project should be held to the same standard that was applied to the GSEP and be required to use the "least of the worst" quality water available. Lower consumptive use technology alternatives are viable.

The petitioner also indicates the thermal plume from the use of a dry cooling system would have greater impacts on flight patterns in the area of the Blythe Airport and therefore is not a feasible technology for the project. Staff believes there are alternative designs that could reduce the impacts of dry cooling. Staff will ask additional data requests and conduct the necessary analysis. Staff understands noise and visual impacts may also be a concern but these impacts have also been feasibly mitigated in other cases and additional analysis would be needed.

Analysis and resolution of these issues could be contentious, potentially lengthening the time needed to finalize the PTA assessment.

Alternative Water Supply

The Final Commission Decision for the Blythe II project found that there was insufficient supply of city of Blythe wastewater to be considered a reasonable alternative for supply and that the use of reclaimed water was essentially use of Colorado River water because the city's percolation of the groundwater contributed to flows returning to the Colorado River. The PTA states the city of Blythe has not increased the discharge of wastewater at the wastewater treatment plant, nor has additional treatment been installed at the wastewater treatment plant. Therefore, use of the city of Blythe wastewater as water supply is infeasible.

Given current changes in the groundwater basin balance and the new evidence showing the direct link of groundwater in the Palo Verde Mesa and Palo Verde Valley to the Colorado River, staff believes the use of recycled water as a supply should revisited. Although use of recycled water could indirectly impact flows to the Colorado River, the loss in flow should be balanced with the potential degradation of water quality that often occurs with discharge of higher salinity wastewater. Staff also understands that the project owners of the adjacent Blythe Solar Power Project have been approached by the city of Blythe to discuss their possible use of recycled water for project operation. Based on this information it appears there may be some recycled water available for use in the basin. Staff would be required to further analyze the availability of this supply and the feasibility of its use for the Sonoran project.

Analysis and resolution of these issues could be contentious, potentially lengthening the time needed to finalize the PTA assessment.

Water Conservation Offset Program

Staff acknowledges that one approach to justifying use of freshwater for project operation would be to implement an offset program that would conserve water in an equal amount to the proposed use. The PTA suggests that the project owner is no longer interested in fallowing irrigated lands as part of the Water Conservation Offset Program (WCOP) that was required in the original license. The PTA states the owner is evaluating alternative offset options, such as canal lining.

Though the PTA states the owner is considering canal lining, no additional details about how the offset would be achieved are provided. It is already well established that water lost from canals on Palo Verde Mesa and in Palo Verde Valley eventually reach the Colorado River. Canal lining that seeks to reduce seepage would ultimately just reduce flow to the Colorado River.

The 2005 Commission Decision detailed an extensive record of discussions between Energy Commission staff, the United States Bureau of Reclamation, Metropolitan Water District, Palo Verde Irrigation District, and the Colorado River Board regarding the appropriateness of the proposed WCOP. The Commission Decision states, "The BEPII WCOP will target 786 acres to be acquired and confirmed prior to commercial operation and selected from eligible acreage in the Palo Verde Valley or mesa. The final submitted WCOP provides for an average consumptive water use rate of 4.2 acre-feet per acre." Condition of Certification **WATER RES - 2** is also tailored to the expectation that the owner would fallow irrigation land to achieve the offset proposed in the last WCOP. Staff is concerned that the petitioner will be unable to achieve an appropriate offset as required in the 2005 Commission Decision.

Staff's preliminary conclusions regarding the availability of offsets for the proposed project water use in the Colorado River basin is that they are limited and will be difficult to identify. Even if they were identified, staff believes it would also be difficult to verify they have been achieved and have had a direct benefit to the Colorado River Basin. Analysis and resolution of this issue could be contentious, potentially lengthening the time needed to finalize the PTA assessment.

TRAFFIC AND TRANSPORTATION

Background and Major Issue

Staff is concerned that thermal plumes from the proposed Sonoran Energy Project combined with plumes generated by the existing BEPI and the anticipated Irish Energy Project could have a cumulatively significant impact on aviation activities at the Blythe Airport. The Blythe Airport is the largest airport serving eastern Riverside County and serves primarily general aviation demand in the Blythe area. Aircraft operations average 69 per day or 25,185 per year. All three projects are or would be within a mile of the airport and located on or near the extended runway centerline of Runway (RY) 26, which is the main runway. As noted in the December 2005 Energy Commission Decision in the BEPII proceeding, "Aircraft on approach to Runway 26, depending on weather and power plant operating conditions, could experience turbulence from either or both of the BEPI and BEPII cooling towers and/or Heat Recovery Steam Generator (HRSG) stacks." Consequently, low-flying aircraft on final approach to RY 26 may fly over one or more of these facilities. The Sonoran PTA notes the thermal plumes from the gas turbine exhaust stacks would maintain a velocity of 4.3 meters per second (m/s) up to 800 feet above ground level (AGL), the velocity threshold at which aircraft could experience moderate to severe turbulence when flying through these plumes. Plumes from the cooling towers would exceed the 4.3 m/s threshold up to 1,088 feet AGL. Staff will be performing a cumulative plume modeling analysis to determine potential aviation impacts. Staff may request information necessary to perform this analysis from the project owner in the first round of data requests.

The BEPII decision included Condition of Certification **TRANS-9** to mitigate the potential flight risk from thermal plumes from the proposed project: "The project owner shall not commence construction of BEPII until the following are accomplished:

- 1. A remark is placed on the (Blythe) Airport's Automated Surface Observation System;
- 2. The VFR traffic pattern to Runway 26 is changed from left-hand turns to right-hand turns; and
- 3. A runway, other than runway 26, is designated as the primary calm wind runway."

The PTA proposes a revision to **TRANS-9** noting that the "project owner shall provide documentation that a request for implementation of the (identified three) measures has been submitted to the Federal Aviation Administration (FAA), the City of Blythe, the Riverside Airport Land Use Commission prior to commencing construction of the project." The PTA does not contain any justification for weakening the explicit language of BEPII Decision's **TRANS-9** that items 1-3 be implemented prior to the start of construction. Subsequent to the publication of the December 2005 BEPII decision, some changes have occurred that affect **TRANS-9**. The Instrument Landing System approach to RY 26, which brought aircraft directly over BEPI at 350 feet AGL, has been de-activated. Staff believes that due to the wide open space around the Blythe Airport and the distance (4,500 to 5,000 feet) between the existing BEPI and proposed power plants and RY 26, there is adequate airspace for pilots to enter the traffic pattern for final approach and landing without flying directly over the power plants. Staff intends to contact the FAA and the Riverside County Airport Land Use Commission for their input

regarding these changes. Staff will discuss these changes more fully in the Preliminary Staff Assessment for Sonoran and may propose modifications to **TRANS-9**.

TRANSMISSION SYSTEM ENGINEERING

Background and Major Issue

According to the Western System Impact Study (SIS) report provided with the petition, the project owner has not decided on whether they will interconnect with Western as a Network Resource (Capacity) or as an Energy Resource. The project impacts and mitigation would be different depending on whether or not they interconnect as a capacity or energy only resource.

The SIS shows potential violations on neighboring systems including a voltage issue on the Metropolitan Water District (MWD) system and a thermal overload on Southern California Edison's (SCE) Julian Hinds to Mirage 230 kV line. These potential impacts on neighboring systems will require consultations with MWD and SCE and could result in the need for further studies which could impact the schedule of the staff analysis.

The information on potential transmission impacts is incomplete. Completing the analysis of the transmission system and any identified downstream transmission impacts could possibly affect the overall project schedule.

ENVIRONMENTAL JUSTICE

Staff will review the impacts resulting from the construction and operation of the proposed amended project, to determine if minority or low-income populations would be significantly or adversely impacted. Staff is working with the Hearing Officer and Public Adviser to ensure that adequate public outreach and noticing takes place for workshops and document availability.

PROJECT SCHEDULE

On the following page is staff's proposed schedule for the key events of the Sonoran amendment proceeding. The schedule includes some proposed dates and sets days of when items would be proposed to be completed after certain information is provided. Meeting the proposed schedule will depend on: the petitioner's timely response to staff's data requests; determinations by other local, state and federal agencies; the submittal of required applications and approval of permits by federal agencies; and other factors not yet known.

STAFF'S PROPOSED SCHEDULE

Sonoran Energy Project Amendment - (02-AFC-1C)

| ACTIVITY | DATE |
|---|---------------|
| Project Owner files SEP Petition to Amend | 08/07/2015 |
| Staff files Notice of Receipt | 08/24/2015 |
| Committee assigned | 08/12/2015 |
| Staff files Issues Identification Report | 09/21/2015 |
| Informational Hearing / Site Visit | 09/28/2015 |
| Staff files Data Requests Set 1 | 10/01/2015 |
| Parties file Status Report #1 | 11/02/2015 |
| Project Owner provides data responses | 11/01/2015 |
| Mojave Air Pollution Control District Issues Preliminary Determination of Compliance (PDOC) | 11/20/2015 |
| Preliminary Staff Assessment filed | 12/21/2015 |
| Parties file Status Report #2 | 12/02/2015 |
| Preliminary Staff Assessment Workshop | PSA + 15 days |
| Mojave Air Pollution Control District Issues Final Determination of Compliance (FDOC) | 01/20/2016 |
| Final Staff Assessment filed | PSA + 60 |
| Prehearing Conference* | TBD |
| Evidentiary hearings* | TBD |
| Presiding Member's Proposed Decision (PMPD)* | TBD |
| Committee Hearing on PMPD* | TBD |
| Addendum/Revised PMPD (if necessary)* | TBD |
| Energy Commission Decision* | TBD |

^{*} The assigned Committee will determine this part of the schedule.