DOCKETED

Docket Number:	06-AFC-07C
Project Title:	Humboldt Bay Generating Station - Compliance
TN #:	211886
Document Title:	Petition for Project Modification (06-AFC-07C), Relocation of Gas Meter
Description:	The meter relocation consists of four elements: $\hat{a} \in \phi$ Installation of a new pipel connection from a new first point of interconnection with Line 189 on the HB site to the relocated gas meter $\hat{a} \in \phi$ Relocation of the meter $\hat{a} \in \phi$ Installation of above and below ground pipe for the meter $\hat{a} \in \phi$ Removal of the original 32-for pipeline connection from Line 189
Filer:	Jonathan Fong
Organization:	California Energy Commission
Submitter Role:	Commission Staff
Submission Date:	6/20/2016 1:38:25 PM
Docketed Date:	6/20/2016



Humboldt Bay Generating Station 1000 King Salmon Ave. Eureka, CA 95503-6859

HBGS-CEC-126

May 20, 2016

Mr. Jonathan Fong Compliance Project Manager California Energy Commission Energy Facilities Siting and Compliance Division 1516 Ninth Street, MS 2000 Sacramento, California 95814-5512

Subject: Humboldt Bay Generating Station - Petition for Project Modification (06-AFC-07C), Relocation of Gas Meter

Dear Mr. Fong:

Enclosed please find a petition for project modification for the Humboldt Bay Generating Station (HBGS), in compliance with Section 1769 of the California Energy Commission Siting Regulations. The purpose of this petition is to relocate the gas meter.

The amendment application fee of \$5,000 is being mailed to you under separate cover.

Should you have any questions, please contact Scott Washington at 707-269-1810 or Susan Strachan at 530-757-7038.

Sincerely,

Chuck Holm Humboldt Bay Generating Station Manager

attachment

Pacific Gas and Electric Company Humboldt Bay Generating Station (06-AFC-7C)

Petition for Project Modification – Relocation of Gas Meter

Pursuant to the California Energy Commission (CEC) Siting Regulations (California Code of Regulations Title 20, Section 1769, Post Certification Amendments and Changes), Pacific Gas and Electric Company (PG&E) hereby submits this petition for project modification, for the Humboldt Bay Generating Station (HBGS) (06-AFC-7C) to relocate the facility's natural gas meter.

Background

To ensure safety of its gas transmission system, PG&E has implemented a comprehensive in-line inspection program. In-line inspection is a method of inspecting a pipeline to detect defects such as corrosion, dents, metal loss, and cracks. The inspection is done by running an in-line inspection tool, also referred to as a smart pig, through the line to identify and record potential pipe defects or abnormalities.

PG&E's Project I-104 consists of in-line inspection upgrades in 15 locations within 24 miles of gas transmission pipeline in Humboldt County. These upgrades include the installation of inspection tool launchers and receivers, and the removal of pipeline features and replacement of valves and pipe "elbows" (relatively sharp pipeline turning angles) to enable inspection tools to travel through the pipes. As shown in Figure 1, the proposed upgrades are on pipeline L-177A from Cummings Creek Station to where it interconnects with Line 189. There are also proposed upgrades on Line 189 from its interconnection point with Line 177A, to where Line 189 terminates on the HBGS site. Of the 15 upgrade locations, four are located in the Humboldt County Coastal Zone and therefore require permitting under the California Coastal Act. The locations of these four upgrades are shown in Figure 2.

The upgrade to Line 189 where it terminates on the HBGS site consists of the installation of an in-line inspection tool receiver and return line. The receiver is where the in-line inspection tool/smart pig is removed after traveling through the gas pipeline transmission system. The return line is used to help force the tool to the end of the receiver.

The PG&E parcel in which the HBGS site is located is within the retained jurisdiction zone of the California Coastal Commission (CCC). Given this, the CCC, rather than Humboldt County, has permitting jurisdiction for development on the parcel, except modifications related specifically to the HBGS facility are under the CEC's jurisdiction. Although Line 189 terminates on the HBGS site, the pipeline existed before the HBGS obtained its CEC license and, therefore, is under the jurisdiction of the CCC. A Coastal Development Permit for the Line 189 receiver and the four other Coastal Zone upgrades was submitted to the CCC on April 15, 2016.

HBGS Proposed Modification

Below is the information required by Section 1769 for the HBGS modification addressed in this Petition. PG&E believes the proposed modification constitutes an insignificant project change because it will not result in the modification to any conditions of certification or cause the facility to be out of compliance with applicable laws, ordinances, regulations, and standards (LORS).

1. Section 1769 (a)(1)(A) Provide a complete description of the proposed modification, including new language for any conditions that will be affected.

The HBGS is served by a high-pressure natural gas pipeline (Line 189) which was originally built to serve the recently decommissioned Humboldt Bay Power Plant (HBPP). Since the gas transmission line was already present, the first point of interconnection for the HBGS gas pipeline licensed by the CEC, was where Line 189 terminated on the HBGS site. From this interconnection point, the HBGS gas pipeline extended approximately 32 feet to the existing HBGS gas meter.

PG&E is proposing to relocate the gas meter in order to accommodate the installation of the Line 189 gas receiver and return line at the Line 189 termination point on the HBGS site. The proposed location of the relocated HBGS gas meter is shown on Figure 3. The location of the existing HBGS gas meter is also shown.

The meter relocation consists of four elements:

- Installation of a new pipeline connection from a new first point of interconnection with Line 189 on the HBGS site to the relocated gas meter
- Relocation of the meter
- Installation of above and below ground pipe for the meter
- Removal of the original 32-foot pipeline connection from Line 189

Each of these elements is discussed further below.

HBGS Pipeline Connection to Line 189

The HBGS gas meter piping will interconnect to a new 8-inch-diameter pipeline immediately after the in-line inspection return line for the Line 189 receiver, as shown in Figure 3. The CEC's jurisdiction will begin at this interconnection point. Approximately 5-feet of new underground pipe will be installed from the interconnection point to the relocated gas meter. The pipe will be buried at a depth of approximately 8 feet. The pipe will then transition aboveground and interconnect with the relocated gas meter.

Relocated Gas Meter

The relocated gas meter, which consists of an ultrasonic meter, Supervisory Control and Data Acquisition System, flow conditioner, and filter, will be relocated from its current location on the HBGS to the proposed location shown in Figure 3. The meter will be approximately 3 feet aboveground.

Gas Meter Piping

Approximately 16 feet of new aboveground pipe will be installed at the northern end of the gas meter, extending from the relocated gas meter to the existing HBGS regulator station. In addition, a hard bypass consisting of approximately 43 feet of new above ground pipeline running parallel to the gas meter will also be installed. The hard bypass pipe enables natural gas to continue to flow if maintenance is being conducted on the meter. This pipe will also be at a height of 3 ft.

32-Foot Gas Pipeline Connection

Given the proposed location of the gas meter, the original 32-foot pipeline connection from Line 189 will not longer be required and will be removed.

Construction and Schedule

The gas meter will be installed in a graveled area within the HBGS fence line. Approximately 6 to 8 workers will be required for the approximately one-month-long construction effort. The construction will require the use a welding rig, an excavator, a fork lift, dump truck, a pipeline coating truck, and a testing trailer. Construction is scheduled to begin by mid-September 2016.

2. Section 1769 (a)(1)(B) Provide a discussion of the necessity for the proposed modification

PG&E's in-line inspection program is designed to enhance the safety of its gas transmission system. For PG&E's gas transmission system in Humboldt County, in-line inspection tool launchers and receivers will be installed. The Line 189 receiver must be installed where the pipeline terminates, which is at the HBGS site. However, in order to accommodate the receiver, it is necessary to relocate the existing HBGS gas meter.

3. Section 1769 (a)(1)(C) - If the modification is based on information that was known by the petitioner during the certification proceeding, provide an explanation why the issue was not raised at that time

PG&E plans to install an in-line inspection tool receiver resulting in the need to relocate the existing gas meter occurred after the HBGS certification proceeding. Therefore, the modification is not based on information known to PG&E during the certification proceeding.

4. Section 1769 (a)(1)(D) - If the project modification is based on new information that changes or undermines the assumptions, rationale, findings, or other bases of the final decision, provide an explanation of why the change should be permitted

The proposed modification does not undermine the assumptions, rationale, findings, or other basis of the Final Decision for the HBGS. The modification will result in an enhancement to the Humboldt County gas transmission system since it will enable an in-line receiver for the gas transmission system to be installed and in-line inspections of the gas transmission system to occur.

5. Section 1769 (a)(1)(E) – Provide an analysis of the impacts the modification may have on the environment and proposed measures to mitigate any significant adverse impacts

No significant and adverse environmental impacts are anticipated as a result of the project. Construction will occur within a graveled area within the HBGS fence line. Given this, there will be no impacts to biological resources.

With regard to cultural resources, there are three distinctive soil horizons on the HBGS site that have differential archaeological sensitivity. They are Horizon A, Horizon B, and Horizon C. All cultural resource discoveries during HBGS construction were observed within Horizon A, which coincides with the timeframe for human habitation within the region. During construction of the HBGS, the Horizon A in the area of the relocated gas meter and associated piping was completely removed to a depth of approximately 8 feet. The excavation for the 5-foot segment of underground pipe associated with the meter relocation will be approximately 8 feet. Given the proximity to the Horizon A, a Cultural Resources Monitor will be present during the excavation of native soil. Excavations for the aboveground pipe footings will be at a depth of approximately 4.5 feet. Since there is no native soil at this depth, monitoring should not be necessary.

The following environmental protection measures will be taken during construction:

• Worker Environmental Awareness Training will be provided to the construction workers prior to commencing work.

• Best Management Practices will be employed to ensure stormwater run-off from construction will not affect adjacent areas.

6. Section 1769 (a)(1)(F) Provide a discussion of the impact of the modification on the facility's ability to comply with applicable laws, ordinances, regulations, and standards

The proposed modification to relocate the gas meter will not affect the ability of the HBGS to comply with applicable LORS.

 Section 1769 (a)(1)(G) and (H) – Provide a discussion of how the modification affects the public and a discussion of the potential effect on nearby property owners, the public and parties in the application proceedings.

The proposed modification to relocate the existing gas meter will have no impact on the public, nearby property owners, and parties to the proceeding. All construction activity will occur within property owned by PG&E.

8. Section 1769 (a)(1)(H) - Provide a list of property owners potentially affected by the modification

Attachment 1 includes the list of property owners within 1,000 feet of the HBGS site.

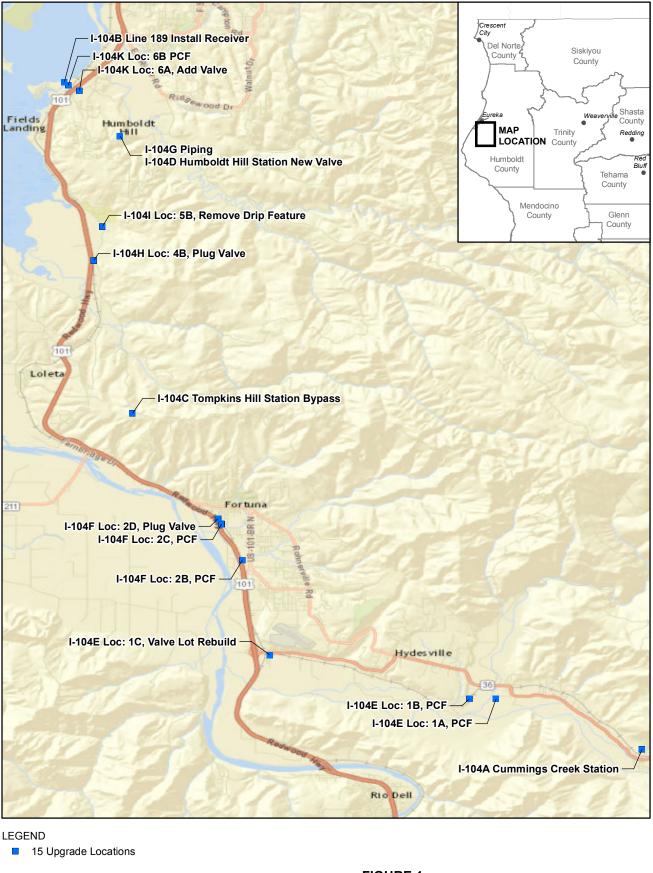
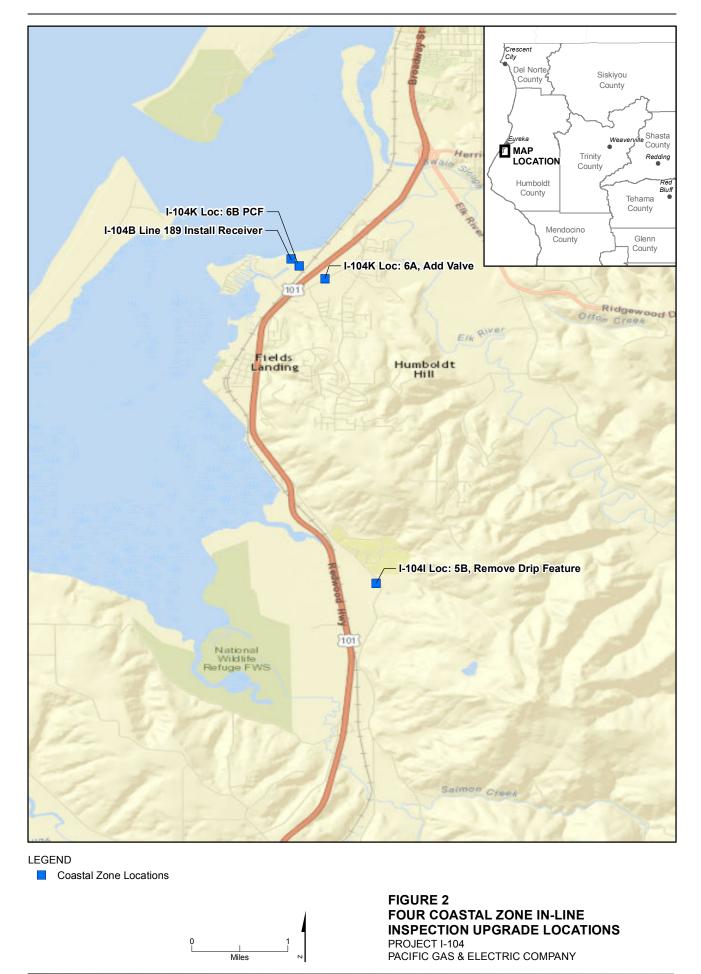
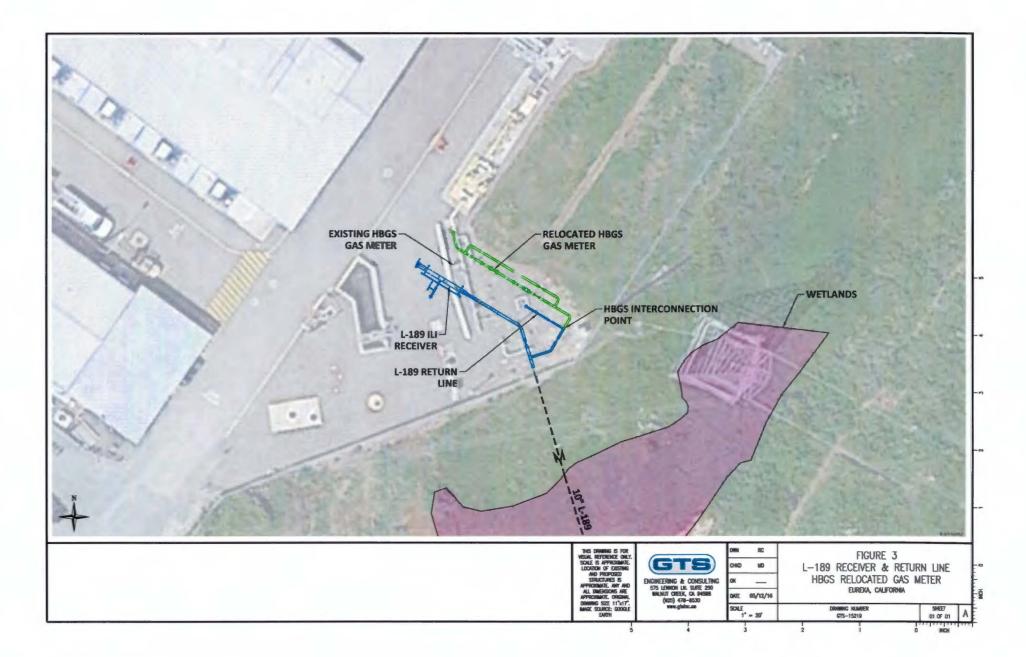


FIGURE 1 FIFTEEN IN-LINE INSPECTION UPGRADE LOCATIONS PROJECT I-104 PACIFIC GAS & ELECTRIC COMPANY





ATTACHMENT 1

Property Owners Within 1,000 Feet of the HBGS Site

APN 305-141-005 Humboldt Bay Harbor Recreational & Conservation District PO Box 1030 Eureka, CA 95502

APN 305-131-013, 016 & 038 Jim & Claire Hoff 3831 Turtle Creek Blvd – 20C Dallas, Tx 75219

APN 305-131-003 North Coast Railroad Authority 419 Talmage Road, Ste M Ukiah, CA 95482

APN 305-131-026 Humboldt Community Services District P.O. Box 158 Cutten, CA 95534