

## DOCKETED

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July 8, 2016

Leonidas Payne, Project Manager  
Siting, Transmission and Environmental Protection Division  
California Energy Commission  
1516 Ninth Street, MS-15  
Sacramento, CA 95814

Subject: Pomona Repower Project (16-SPPE-01)  
Response to Union Pacific's May 19, 2016 Comment Letter

Dear Mr. Payne:

On behalf of AltaGas Pomona Energy Inc. (Applicant), Sierra Research is responding to Union Pacific Railroad's (Union Pacific) May 19, 2016 letter commenting on the Small Power Plan Exemption (SPPE) Application for the Pomona Repower Project (PRP). Provided below are our responses to the three main issues raised in the Union Pacific letter.

Issue Number 1: Union Pacific objects to any power generating installation within three hundred (300) feet of railroad right of way, measured from the centerline of Union Pacific's track.

*Response:* As discussed in the SPPE Application, the PRP is replacing the existing San Gabriel Cogeneration Facility's (San Gabriel Facility) 49 MW gas turbine power generation unit with a new high efficiency 100 MW unit. (See SPPE. pp. 1-1 and 2-1.) The existing power generating unit at the San Gabriel Facility has been in operation for over 30 years. One of the key electrical components of the existing unit is the generator step-up transformer (GSU). The GSU for the existing unit is located approximately 390 feet from the center line of Union Pacific's closest track. The GSU for the proposed new PRP generating unit is located approximately 395 feet from the center line of Union Pacific's closest track. Both of these distances are beyond the 300 feet listed in Union Pacific's letter. In addition, the new PRP generating unit GSU is marginally farther away from the closest Union Pacific track compared to the existing GSU. Given that the PRP is replacing an existing power generating unit and because the PRP will not result in the GSU being located closer to the nearest Union Pacific track, the Applicant does not believe the PRP will result in any new impacts with regard to this issue.

Issue Number 2: Union Pacific raises concerns regarding high voltage power lines in close proximity to railroad tracks.

*Response:* As discussed in the PRP SPPE Application, the PRP will interconnect to Southern California Edison's (SCE) existing high voltage 66-kv power lines using the

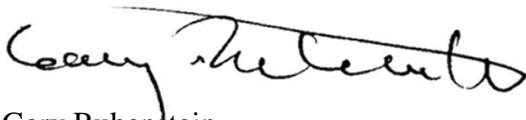
existing San Gabriel Facility 0.2 mile transmission line. (SPPE, pp. 1-2 and 3-1 and Figure 1.2-3.) The only change to this existing San Gabriel Facility transmission line is reconductoring (i.e., replacing the power cables). Therefore, the Applicant does not believe the PRP will result in any new impacts with regard to this issue.

Issue Number 3: Union Pacific raises concerns regarding ground fault events associated with power towers and/or substations.

*Response*: As discussed above in the response to Issue Number 2, the PRP will use the existing San Gabriel Facility 0.2 mile transmission line including the existing transmission line monopoles. Therefore, there will be no new power towers associated with the PRP. With regard to substations, as discussed in the SPPE Application, PRP will be linked to the power grid by connecting to SCE's Ganesha substation (SPPE, p. 1-2). This existing SCE substation is located approximately 0.1 miles southwest of the existing San Gabriel Facility property line within approximately 50 feet of the closest Union Pacific track. Because there will be no new power poles or substations associated with the PRP, the Applicant does not believe PRP will result in any new impacts with regard to this issue.

We appreciate Union Pacific's concerns for rail safety, and we believe our responses have addressed these concerns. Should you have additional questions or require further information, please do not hesitate to contact me or Tom Andrews at 916-444-6666.

Sincerely,



Gary Rubenstein  
Senior Partner

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