

## DOCKETED

<b>Docket Number:</b>	01-AFC-25C
<b>Project Title:</b>	Malburg City of Vernon-Compliance
<b>TN #:</b>	222876
<b>Document Title:</b>	Approval of Phase I of Turbine Upgrade to Install enhanced turbine and compressor blades during the Spring 2018 outage.
<b>Description:</b>	Approval of Phase I of Turbine Upgrade to Install enhanced turbine and compressor blades during the Spring 2018 outage.
<b>Filer:</b>	Anwar Ali
<b>Organization:</b>	California Energy Commission
<b>Submitter Role:</b>	Commission Staff
<b>Submission Date:</b>	3/5/2018 4:03:51 PM
<b>Docketed Date:</b>	3/5/2018

**CALIFORNIA ENERGY COMMISSION**

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SACRAMENTO, CA 95814-5512  
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March 5, 2018

Scott A. Galati  
DayZen LLC  
2501 Capitol Avenue, Suite 201  
Sacramento, CA 95816

**SUBJECT: REQUEST FOR AUTHORIZATION TO INSTALL  
TURBINE UPGRADE COMPONENTS AT MALBURG  
GENERATING STATION (01-AFC-25C)**

Dear Mr. Galati,

On November 21, 2017, Bicent (California) Malburg, LLC, (Bicent) filed a Petition to Amend (PTA) (TN 221855) with the California Energy Commission (Energy Commission) to modify the existing Malburg Generating Station (MGS) Final Commission Decision. Bicent also filed a petition to modify its permit to operate (air permit) with the South Coast Air Quality Management District (SCAQMD) on November 13, 2017. The PTA requested approval to 1) install and operate the Siemens A+ turbine upgrade package to both combustion turbines to be completed during the Spring 2018 outage, including minor modifications to existing conditions of certification; 2) conform certain air quality conditions of certification to modifications made by the SCAQMD to its air permit in 2015; and 3) make a minor modification to Condition of Certification **AQ-C8** that restricts the time for testing of the existing fire pump.

On February 9, 2018, Malburg Generating Station received a letter from Siemens (TN 222682), the manufacturer and installer of the turbine upgrade components regarding the Malburg performance upgrade. Siemens asserted that Phase I of the turbine upgrade would include installation of the enhanced turbine and compressor blades during the Spring 2018 outage. Phase II would consist of installing and tuning the engineering software necessary to achieve the enhanced performance discussed in the PTA.

On February 21, 2018, DayZen LLC, on behalf of Bicent, docketed a request (TN 222641) seeking authorization of the Energy Commission of Phase I as a compliance approval and to continue to process the remaining components of the PTA as required by the regulations and in coordination with the SCAQMD. The request also asserted that MGS would not undertake Phase II until such time when SCAQMD amends the air permit and the Energy Commission approves the PTA by amending the MGS Final Commission Decision to allow for conformation of the conditions of certification to the SCAQMD's amended air permit.

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In your letter, you have indicated that MGS obtained confirmation from SCAQMD that Phase 1 would not require modification of the air permit because the physical components that would be installed during the scheduled maintenance activities are functionally equivalent in design to the previously installed components. Additionally, your letter indicated that MGS and SCAQMD agreed that the facility would operate without the enhanced performance until the turbine tuning and installation of the engineering software by Siemens as part of Phase II. Therefore, Phase I would not require amendment of any of the conditions of the air permit or conditions of certification in the Final Commission Decision.

Staff has reviewed the information you provided and determined that implementation of Phase I of the turbine upgrade does not meet the definition of a project modification in Title 20, California Code of Regulations, section 1769(a)(1). You are hereby approved to proceed with Phase I as outlined above. Should the scope of these activities, as described above, change significantly, please contact us as this may change our decision.

If you have questions, please feel free to contact Compliance Project Manager, Anwar Ali, at (916) 654-5020, or via e-mail at [anwar.ali@energy.ca.gov](mailto:anwar.ali@energy.ca.gov).

Sincerely,



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CHRISTINE ROOT  
Compliance Office Manager  
Siting, Transmission, & Environmental Protection  
Division