

**DOCKETED**

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<b>Project Title:</b>	Contra Costa Power Plant Project Compliance
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<b>Document Title:</b>	Letter Regarding Removal and Replacement of Underground Natural Gas Pipelines
<b>Description:</b>	Letter
<b>Filer:</b>	Raquel Rodriguez
<b>Organization:</b>	California Energy Commission
<b>Submitter Role:</b>	Commission Staff
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**CALIFORNIA ENERGY COMMISSION**

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March 15, 2019

Angel B. Espiritu  
Environmental Compliance Manager  
Gateway Generating Station  
Pacific Gas and Electric Company (PG&E)  
3225 Wilbur Avenue  
Antioch, CA 94509

**SUBJECT: REMOVAL AND REPLACEMENT OF UNDERGROUND  
NATURAL GAS PIPELINES AT GATEWAY GENERATING  
STATION (00-AFC-01C)**

Dear Mr. Espiritu,

On January 24, 2019, the California Energy Commission received a project change questionnaire for work to be conducted by PG&E Gas Department on natural gas pipelines located within the site parcel boundaries of the Gateway Generating Station (Gateway). The work includes installation of two above ground receivers on gas pipelines L-400 and L-400-3 for purpose of conducting inline inspection of the pipelines. In addition, PG&E will remove a section of an existing 26-inch natural gas pipeline from below grade, retire-in-place a section of an existing below grade 26-inch natural gas pipeline, install 240 feet of new 36-inch natural gas pipeline below grade, and remove two drips on the natural gas pipelines. The pipeline activities will result in the removal of a portion of an existing line of trees that will either be replanted or replaced.

Staff has reviewed the proposed activities and for the following reasons determined that an approval by the Energy Commission is not required for the planned pipeline work on the Gateway property. The pipeline at issue predates the licensing of the Gateway facility and was not part of the filed project and Commission's license issued in 2001. The pipeline should be subject to oversight by the California Public Utilities Commission. The activities do not meet the definition of a project change in Title 20, California Code of Regulations, section 1769(a)(1), and therefore, do not require approval of a post-certification petition. Further, these activities will not require oversight from the California Energy Commission Delegate Chief Building Official.

The proposed work will result in the removal of a row of trees on the Gateway facility site. While the pipeline work is not subject to the Energy Commission's jurisdiction, the trees are part of the Gateway license and required under Condition of Certification VIS-4. Therefore, in order to comply with VIS-4, the replanting of trees will have to occur once the pipeline work is completed. Please note it is the responsibility of the Gateway owner to ensure compliance with VIS-4, not the entity performing the gas line work. For questions regarding the implementation of VIS-4 please contact the Compliance Project Manager (CPM).

Mr. Espiritu  
March 15, 2019  
Page 2

Staff understands it is PG&E's practice to conduct a preconstruction nesting bird survey 14 days prior to the start of construction activities, and that PG&E can provide the Energy Commission with the results of the survey. Since work is planned during the nesting season (February-August), providing a copy of the survey results will ensure the Gateway owner's conformance with Condition of Certification BIO-5. If a nesting bird(s) is detected in the landscape tree(s) identified for removal, the owner shall consult with the CPM on how to proceed.

Staff notes that there is a moderate to high potential for previously unknown historic and prehistoric resources to be encountered during subsurface work on the Gateway property. Staff recommends the implementation of best practices when digging such as the use of monitors and implementation of worker environmental awareness training. A discovery of cultural material in the areas of digging associated with the landscape trees would be subject to the conditions of certification in the Gateway license.

Should the scope of the above noted activities change significantly, please contact us as this may change our decision that the activities do not require approval of a post-certification petition.

If you have any questions or concerns, please contact John Heiser, Compliance Project Manager, at (916) 653-8236, or by fax to (916) 654-3882, or via e-mail at [John.Heiser@energy.ca.gov](mailto:John.Heiser@energy.ca.gov).

Sincerely,



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