

**DOCKETED**

<b>Docket Number:</b>	98-AFC-01C
<b>Project Title:</b>	Pittsburg District Energy Facility - Commission Adoption Order (Order No. 99-0817-01)
<b>TN #:</b>	237030
<b>Document Title:</b>	Los Medanos Energy Center (98-AFC-01C) Petition for Staff Approved Modification to Support San Francisco Bay Aggregates Carbon
<b>Description:</b>	N/A
<b>Filer:</b>	Amanda Cooley
<b>Organization:</b>	Ellison Schneider Harris & Donlan LLP
<b>Submitter Role:</b>	Applicant Representative
<b>Submission Date:</b>	3/8/2021 12:22:33 PM
<b>Docketed Date:</b>	3/8/2021



## Calpine Corporation

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March 8, 2021

Mr. John Heiser  
Compliance Project Manager  
California Energy Commission  
1516 Ninth Street, MS-15  
Sacramento, CA 95814

**RE: Los Medanos Energy Center (98-AFC-01C): Petition for Staff Approved Modification to Support San Francisco Bay Aggregates Carbon Capture and Utilization Project**

Dear Mr. Heiser:

Los Medanos Energy Center, LLC (“Project Owner”) hereby submits the attached *Petition to Amend* for the Los Medanos Energy Center (“LMEC”) for a proposed modification that will allow the LMEC to supply treated stack gas to a neighboring carbon capture and utilization project being developed by San Francisco Bay Aggregates. The carbon capture and utilization facility will remove carbon dioxide (“CO<sub>2</sub>”) from a slipstream of flue gas from the LMEC and combine the removed CO<sub>2</sub> with locally sourced demolished/returned concrete to produce new “CO<sub>2</sub> sequestered” and “upcycled” rock products.

The Project Owner is not proposing any significant physical changes to the site or major equipment. There will be no new ground disturbance at the LMEC site, no new buildings, and no changes to project operations. The minor modification will require only the installation of a new pipe rack and 8-inch pipe to transfer the flue gas and will not affect the facility’s ability to operate in compliance with applicable laws, ordinances, regulations, and standards.

The Project Owner requests expedited review and approval by California Energy Commission Staff by **April 5, 2021** to facilitate installation of the pipe necessary to tie-in the carbon capture and utilization project to the LMEC during a previously scheduled outage for the facility.

Please do not hesitate to contact me at [Barbara.McBride@calpine.com](mailto:Barbara.McBride@calpine.com) if you have any questions.

Sincerely,

Barbara McBride  
Director of Strategic Origination and Development  
Calpine Corporation

**LOS MEDANOS ENERGY CENTER  
(98-AFC-01C)  
PETITION FOR STAFF APPROVED CHANGE TO SUPPORT CARBON  
SEQUESTRATION AND UTILIZATION PILOT**

Pursuant to Section 1769 of the California Energy Commission’s (“CEC’s”) Regulations, Los Medanos Energy Center, LLC (“Project Owner”) hereby submits this petition for CEC Staff approval of a minor change to the Los Medanos Energy Center (“LMEC”). The Project Owner proposes installation of an 8-inch pipe that will allow the LMEC to supply stack gas to a carbon capture and utilization facility. The Project Owner requests approval of this petition by April 5, 2021 to ensure that the modification can be installed during a previously scheduled outage for the facility.

**1. Section 1769 (a)(1)(A) and (B): description of the proposed change, including new language for any conditions of certification that will be affected, the necessity for the proposed change, and why the change should be permitted.**

The Project Owner is proposing to install an 8-inch pipe to transfer stack gas from the LMEC to a carbon capture and utilization facility located on a neighboring property, the San Francisco Bay Aggregates facility. The proposed modification is needed to allow the carbon capture and utilization facility to remove carbon dioxide (“CO<sub>2</sub>”) from a slipstream of flue gas from the LMEC and combine the removed CO<sub>2</sub> with locally sourced demolished/returned concrete to produce new “CO<sub>2</sub> sequestered” and “upcycled” rock products.

For the demonstration phase, approximately 1% of the stack gas will be transferred for CO<sub>2</sub> removal. Flow through the flue gas pipe will be controlled by a damper installed at the point of interconnection between the pipe and the stack. The flue gas pipe will be supported on a new pipe rack within LMEC for a short distance and then will align with existing steam and condensate lines that leave LMEC to support its cogeneration thermal host. The pipe will interconnect into the stack and run the length of the property (approximately 80 feet) and interconnect to the San Francisco Bay Aggregate pipe at the fence line of the facility.

The proposed change should be approved as the demonstration project supports California’s greenhouse gas emissions reductions goals. Experience gained from this pilot will further the maturation of technologies for the beneficial use of sequestered carbon.

There are no proposed changes to the Conditions of Certification.

**2. Section 1769(a)(1)(C): description of any new information or change in circumstances that necessitated the change.**

The change is to support a carbon capture and utilization pilot project that will be constructed on a neighboring property.

**3. Section 1769(a)(1)(D): analysis of the effects that the proposed change may have on the environment and proposed measures to mitigate any significant environmental effects.**

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The proposed change will not result in an adverse change to the environment. LMEC will continue to comply with existing emissions limits, and there are no potential impacts to public health. Compliance with existing conditions and best management practices governing construction and maintenance activities on site will ensure that there are no significant adverse impacts, and no other mitigation measures are proposed.

**4. Section 1769(a)(1)(E): analysis of how the proposed change would affect the project's compliance with applicable laws, ordinances, regulations, and standards.**

The proposed change will not impact the LMEC's ability to comply with applicable laws, ordinances, regulations, and standards.

**5. Section 1769(a)(1)(F): discussion of how the proposed change would affect the public.**

The proposed change will not adversely affect the public. The proposed change does not result in new construction or other physical changes to the environment and does not negatively impact air quality or public health. There are no significant adverse effects on property owners that will result from the adoption of the change proposed.

**6. Section 1769(a)(1)(G): provide a list of current assessor's parcel numbers and owners' names and addresses for all parcels within 500 feet of any affected project linears and 1000 feet of the project site.**

The Project Owner can provide a list of property owners upon request.

**7. Section 1769(a)(1)(H): discussion of the potential effect on nearby property owners, residents, and the public.**

The proposed change will have no significant environmental effects and will be in compliance with applicable LORS. Therefore, the proposed change will have no impact on property owners, residents, or the public.

**8. Section 1769(a)(1)(I): discussion of exemptions from the California Environmental Quality Act that may apply to approval of the proposed change.**

The proposed change is categorically exempt pursuant to Title 14, Section 15301 of the California Code of Regulations as an activity that constitutes a minor alteration of existing facilities involving negligible or no expansion of the existing use.