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**Petition for Temporary Safety Modifications**

**Russell City Energy Center**

Hayward, California

Submitted to  
**California Energy Commission**

Submitted by  
**Russell City Energy Company, LLC**

June 2021

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# Introduction

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Pursuant to Section 1769 of the California Energy Commission's ("CEC") regulations, Russell City Energy Company, LLC ("Project Owner") submits this petition to modify the certification ("Petition") of the Russell City Energy Center ("RCEC") to install temporary safety modifications to the steam turbine condenser, which will allow the facility to operate in a simple-cycle mode. This will allow the facility to return to service for August/September 2021 at its simple-cycle capacity, provide frequency and voltage, and support local and system grid reliability needs in the summer and fall of 2021. In simple-cycle mode, RCEC can provide approximately 300 to 350 MW of capacity and frequency and voltage support to the applicable resource area. The temporary modification will also ensure that the facility can continue to provide Black Start service to the California Independent System Operator ("CAISO").

The modifications will not result in any increased emissions from the facility or significant environmental impacts, and the facility will continue to be in compliance with all applicable laws, ordinances, regulations, and standards ("LORS"). There will be no changes to any conditions of certification as a result of this Petition.

Section 1.0 provides an overview of the Petition. Section 2.0 provides a complete description of the proposed temporary modifications and the necessity for the proposed changes. Section 3.0 assesses the potential environmental effects of the proposed changes and the project's continued compliance with all applicable LORS.

Project Owner requests expedited consideration and approval of this Petition by the CEC at its July 15, 2021 Business Meeting, or, if feasible, at an earlier Special Business Meeting.

## 1.1 Overview of the Temporary Modifications

RCEC is a nominal 600 megawatt ("MW") combined-cycle natural gas fired power plant located in Alameda County. On Thursday, May 27, 2021, at approximately 11 p.m., RCEC experienced a mechanical event inside the steam turbine generator compartment that required the deployment of the fire department to the facility. As a result of the event, the steam turbine and steam turbine generator experienced significant damage. The cause of the event is currently being investigated.

Project Owner is petitioning to allow the facility to make temporary modifications to the steam turbine condenser that will allow for simple-cycle operation while the facility's damage is being evaluated. RCEC currently has the capability to operate in simple-cycle mode. The facility is equipped with a steam bypass system that can bypass the steam turbine and send it to the condenser, similar to how the facility is operated during startups and shutdowns. The modifications include placing an isolating plate (blind) at the expansion joint between the condenser and steam turbine and installing a rupture disk and pressure relief vent. These temporary modifications will allow all the heat recovery steam generator steam to be routed to the condenser and ensure safe operation of the facility in simple-cycle mode. Upon completion of the repairs and return of combined-cycle operation capabilities, the temporary isolating plate, rupture disk and pressure relief vent will be removed.

This Petition contains all of the information that is required pursuant to Section 1769 of the CEC's Regulations. The information necessary to fulfill the requirements of Section 1769 is contained in Sections 1.0 through 7.0, as summarized in Table 1.1-1.

**TABLE 1.1-1**  
**Informational Requirements for Post-Certification Modifications**

<b>Section 1769 Requirement</b>	<b>Section of Petition Fulfilling Requirement</b>
(A) A complete description of the proposed change, including new language for any conditions that will be affected.	Section 2.0 – Proposed modifications Section 1.4 – No conditions are affected by this Petition.
(B) A discussion of the necessity for the proposed change and an explanation of why the change should be permitted.	Section 1.2
(C) A description of any new information or change in circumstances that necessitated the change.	Section 1.2
(D) An analysis of the effects that the proposed change to the project may have on the environment and proposed measures to mitigate any significant environmental effects.	Section 1.3, 3.1
(E) An analysis of how the proposed change would affect the project's compliance with applicable laws, ordinances, regulations, and standards.	Section 1.4, 3.1
(F) A discussion of how the proposed change would affect the public.	Section 4.0
(G) 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.	Section 5.0
(H) A discussion of the potential effect of the proposed change on nearby property owners, residents, and the public.	Section 6.0
(I) A discussion of any exemptions from the California Environmental Quality Act that the project owner believes may apply to approval of the proposed change.	Section 7.0

## 1.2 Necessity of Proposed Changes

The Commission's Siting Regulations require a discussion of the necessity for the proposed revision to the RCEC certification and why the change should be permitted. (20 C.C.R. § 1769 (a)(1)(B)).

The proposed modifications are needed due to a recent incident that caused major damage to the steam turbine and the steam turbine generator.

The proposed changes will allow the facility to return to service for critical August/September 2021 at its simple-cycle capacity. In simple-cycle mode, RCEC can provide approximately 300

to 350 MW of capacity and frequency and voltage support to the applicable resource area. The change will also enable continued provision of Black Start service to the CAISO.

### **1.3 Summary of Environmental Impacts and LORS Compliance**

The CEC Siting Regulations require an analysis of the potential impacts the proposed modifications may have on the environment. (20 C.C.R. § 1769 (a)(1)(E)). The regulations also require a discussion of the impact of the modification on the facility's compliance with applicable LORS (Section 1769 (1)(a)(F)). Section 3.0 of this Petition includes a discussion of the potential environmental impacts associated with the modifications, as well as a discussion of the consistency of the modification with LORS. As demonstrated in Section 3.0, there will be no significant environmental impacts associated with the temporary modifications, and the RCEC will continue to comply with all applicable LORS.

### **1.4 Proposed Changes to the Conditions of Certification**

There are no required changes to any of the Conditions of Certification contained in the Commission Decision to facilitate this Petition.

## **2. Description of Temporary Project Modifications**

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Consistent with CEC Siting Regulations (20 C.C.R. § 1769 (a)(1)(A)), this section includes a description of the proposed temporary project modifications.

RCEC is equipped with a steam bypass system that can bypass the steam turbine and send steam directly to the condenser. In fact, this is how the facility is operated during startups and shutdowns. In order to facilitate repairs to the RCEC, a few temporary modifications are proposed for the condenser to facilitate safe operation in simple-cycle mode.

The temporary modifications include placing an isolating plate (blind) at the expansion joint between the condenser and steam turbine and installing a rupture disk and pressure relief vent. These temporary modifications will allow the heat recovery steam generator's steam to be routed to the condenser and ensure safe operation of the facility, while repairs are ongoing.

A specialty contractor with expertise in condenser operation will engineer the project. The project then will be constructed and installed by experienced contract personnel. The project scope will be confined to the steam turbine condenser area within the steam turbine compartment and, therefore, will not require any ground disturbance. Parking and laydown will be contained within the plant site and no additional parking and laydown will be required.

Currently, most of the water that RCEC utilizes is used for cooling water to condense steam. RCEC uses recycled water meeting Title 22 standards from its on-site recycled water system for this purpose. Recycled water use will not increase as part of this temporary project. As with normal operations, the steam will continue to be condensed in the condenser and processed for reuse at the facility.

## 3. Environmental Analysis of Proposed Temporary Project Modifications

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The proposed temporary modification to the steam turbine condenser will not result in any significant environmental effects. As a result, the environmental analysis for all of the environmental disciplines does not differ significantly from that described in the Final Decision, and the impacts associated with this Petition will be less than significant. The environmental analysis for the following environmental disciplines would not differ significantly from the Final Decision for RCEC:

- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Paleontology
- Hazardous Materials Management
- Land Use
- Noise
- Public Health
- Socioeconomics
- Soil and Water Resources
- Traffic and Transportation
- Visual Resources
- Waste Management
- Worker Safety and Fire Protection

The proposed temporary modifications do not require changes to Conditions of Certification.

### 3.1 Environmental Disciplines

#### 3.1.1 Air Quality

The proposed changes do not require any changes to permitted emission levels contained in the CEC's Conditions of Certification for the RCEC. Emissions from the project will not increase as a result of operating for a limited period in simple-cycle mode. Project Owner is also coordinating closely with the Bay Area Air Quality Management District regarding the proposed modifications, facility efficiency, and heat rates. Because there will be no increases to emissions from the RCEC, the proposed changes in the Petition will not cause any adverse impacts to air quality resources.

#### 3.1.2 Biological Resources

All the temporary modifications will take place within the existing facility, and no additional laydown areas will be required. Therefore, the proposed changes in this Petition will not result in significant impacts to biological resources.

#### 3.1.3 Cultural Resources

There will be no ground disturbance as part of the modifications. Therefore, the proposed changes in this Petition will not result in significant impacts to cultural resources.

### **3.1.4 Geology and Paleontology**

The proposed changes will occur on top of the steam turbine deck and will not require any ground disturbance. Therefore, the proposed changes will not have any effect on geological or paleontological resources.

### **3.1.5 Hazardous Materials Management**

No additional hazardous materials will be added as a result of the proposed temporary modifications. Therefore, the proposed changes will not have any effect or changes to the chemical inventory and/or quantities of chemicals used for the project.

### **3.1.6 Land Use**

The proposed changes will not result in changes to the Commission Decision's condition, finding or conclusions regarding land use.

### **3.1.7 Noise and Vibration**

In the unanticipated event that an overpressure of the condenser occurs, the pressure relief vent would release and potentially generate temporary additional noise. However, the noise would not be continuous, and noise levels at the project boundary would not be affected. Therefore, the proposed changes will not result in significant impacts from noise.

### **3.1.8 Public Health**

The proposed changes will have no effect on public health. All activities occur onsite and there are no increases in air emissions.

### **3.1.9 Socioeconomics**

The proposed changes will have no adverse effects on socioeconomics. There may be a temporary beneficial effect associated with the temporary modifications.

### **3.1.10 Soil and Water Resources**

As stated above, water use from the Project will not change as a result of the proposed temporary modifications. Therefore, the proposed changes will not impact soil and water resources.

### **3.1.11 Traffic and Transportation**

The construction of the temporary modifications will require a very small workforce and take approximately two weeks to complete, once the engineering and design are complete. The additional work force will not cause a significant increase in transportation to the site and will be contained within the current parking area at the facility. There will not be any heavy load deliveries associated with the temporary modifications. Therefore, the proposed changes will not impact traffic and transportation.

### **3.1.12 Visual Resources**

The proposed changes will not change the existing visual profile of the RCEC, or add any new visual components. Therefore, there will be no significant impact to visual resources due to the temporary modifications to the project.

### 3.1.13 Waste Management

The proposed changes will not change or impact waste management practices or the types or quantities of waste generated by the construction or operation of the project.

### 3.1.14 Worker Safety and Fire Protection

The proposed changes will be implemented by specialized technicians in accordance with existing Conditions of Certification, BMPs, and applicable LORS. Therefore, the proposed change will not result in any significant impacts to worker safety and fire protection.

## 3.2 LORS

The Commission Decision certifying the RCEC project concluded that the project is in compliance with all applicable LORS. The project, as modified, will continue to comply with all applicable LORS.

## 4. Potential Effects on the Public

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This section discusses the potential effects on the public that may result from the modification proposed in this Petition for Temporary Safety Modification, pursuant to CEC Siting Regulations (20 C.C.R. § 1769(a)(1)(F)).

No adverse effects on the public will occur because of the temporary changes to the project. The proposed changes will in fact benefit the Project by enabling the RCEC to continue to support local and system grid reliability needs, as well as providing Black Start service to the CAISO.

## 5. List of Property Owners

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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 can be provided upon request.

## 6. Potential Effects on Property Owners

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This section addresses potential effects of the project changes proposed in this Petition on nearby property owners, residents, and the public, pursuant to CEC Siting Regulations (20 C.C.R. § 1769 (a)(1)(H)). The RCEC, as temporarily modified, will not differ significantly in potential effects, and will not adversely impact nearby property owners, residents, or the public.

## 7. CEQA Exemptions

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The CEC's power plant siting process is a certified state regulatory program under the California Environmental Quality Act (Pub. Resources Code, § 21080.5; 14 C.C.R. §§ 15250-15253.) As such, it is exempt from the procedural elements of CEQA, though it must adhere to the substantive requirements of CEQA. The CEC's detailed certification process is commonly described as "CEQA-equivalent." CEQA defines a "Project" in pertinent part as "...an activity



which may cause either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment.” (Pub. Resources Code § 21065.)

In this case, RCEC was subject to environmental review in accordance with the CEC’s certified regulatory program. The current operations of the RCEC, including operations in simple-cycle mode, are not a new CEQA “project,” but are part of the existing environmental baseline. Once a project is approved, CEQA does not require that it be analyzed anew every time an action is required to implement the project. Where an EIR, or in this case the CEC’s CEQA-equivalent certification, has been prepared for a project, CEQA expressly prohibits agencies from requiring a subsequent or supplemental EIR, except in specified circumstances, e.g., where the project will have more severe impacts as a result of substantial changes to the project or the circumstances under which it is undertaken. (14 C.C.R. § 15162). As discussed below, the continued operations of RCEC in simple-cycle mode does not trigger any such requirement.

Even assuming that the continued simple-cycle operations were a CEQA “project,” the activities are categorically exempt. The modifications are categorically exempt pursuant to Title 14, Section 15301 of the California Code of Regulations as a minor alteration to an existing facility. Installation of the isolating plate and other changes to facilitate simple-cycle operations are activities that constitute a minor, temporary alteration of existing mechanical equipment at the RCEC. The changes will all be interior to the mechanical equipment and will involve negligible or no expansion of the existing use of the RCEC for power generation. The isolating plate is a temporary safety protection device for use in conjunction with existing mechanical equipment during the repair of the RCEC.

The proposed modifications are also categorically exempt pursuant to Title 14, Section 15302 of the California Code of Regulations. The temporary modifications are consistent with the replacement or reconstruction of existing structures and will have substantially the same purpose and capacity as the structure replaced. Moreover, consistent with subsection (c) of 15302, the temporary modifications are “replacement or reconstruction of existing utility systems and/or facilities involving negligible or no expansion of capacity.”

In addition, the proposed change is also categorically exempt from CEQA pursuant to Section 15061(b)(3), the “Common Sense Exemption.” This exemption provides that “[w]here it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA.” (14 C.C.R. § 15061(b)(3).) In this case, there is no possibility that the proposed change may have a significant effect on the environment. Emission levels of the facility will not increase as a result of the proposed changes. No ground disturbance is required, and noise levels will remain within existing baseline levels. There would be no substantial adverse changes to existing baseline conditions at the RCEC site from the proposed change. Therefore, the proposed temporary modifications are categorically exempt from CEQA pursuant to the “Common Sense Exemption.”