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**PETITION FOR CHANGE OF THE PROJECT DESCRIPTION IN THE FINAL
DECISION TO EXPAND AN EXISTING SWITCH GEAR ENCLOSURE AT
PALOMAR ENERGY CENTER
(01-AFC-24C)**

By:

**SAN DIEGO GAS & ELECTRIC COMPANY
SAN DIEGO, CALIFORNIA**

Submitted to:

CALIFORNIA ENERGY COMMISSION

November 15, 2011

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1.0 INTRODUCTION

San Diego Gas & Electric Company (SDG&E) is filing this petition for a proposed amendment of the project design as described in the Final Decision for the Palomar Energy Center (PEC), Docket 01-AFC-24 pursuant to 20 Cal. Code Regs. Section 1769(a)(1). San Diego Gas & Electric (SDG&E or "the applicant") is proposing to expand the 36'X14' existing switch gear enclosure to provide safe access to the switch gear and motor control center for maintenance and repair. The current enclosure houses the central electric distribution hub for the cooling tower complex and is critical to the daily operations of the plant. No changes in Conditions of Certification are necessary.

2.0 DESCRIPTION OF PROPOSED MODIFICATION (Sec. 1769(a)(1)(A))

Further details of the proposed facilities are as follows:

Cooling Tower Switch Gear Structure Improvement. SDG&E is proposing to add two 6'X22' expansions (one on each side of the building) to the existing switch gear enclosure. The expansion will improve lighting, improve access and location of electrical outlets, and improve access to equipment housed in the enclosure. The expansion will also be fitted with a 12'X8' roll-up door and a man door for accessibility to the housed equipment. The addition of the usable work space will ensure a safe working environment when performing maintenance, repairs, and/or inspections of the equipment. The outer surfaces of the building will be painted the plant color (SW 1022 Cubist grey). Plot plans showing the location of the building and visual simulations are attached in Appendix 1.

3.0 NECESSITY (Sec. 1769(a)(1)(B))

The expansion of the switch gear building will improve facility reliability, efficiency, and convenience to access equipment housed in the structure.

4.0 TIMING (Sec. 1769(a)(1)(C) and (D))

SDG&E assumed ownership of the PEC about three years after issuance of the Final Decision and certification to Palomar Energy, LLC. Since taking ownership of the plant in 2006, SDG&E has continued to review the engineering and design of the plant in order to better serve the needs of SDG&E ratepayers. SDG&E has also benefited from experience gained operating the plant since assuming ownership. This “fine tuning” could not have taken place during the licensing proceeding because SDG&E was not the applicant, the plant was not yet operating, and Palomar Energy brought its own objectives to the development of the project for the merchant market. The addition of this expansion does not change or undermine the assumptions, rationale, findings, or other bases of the Final Decision. The change complies with all laws, ordinances, regulations and standards and does not have a significant environmental impact, as further described below.

5.0 ANALYSIS OF THE EFFECT OF THE MODIFICATIONS ON THE ENVIRONMENT (Sec. 1769(a)(1)(E))

The requested equipment change will have no significant effects on any of the technical areas analyzed in the August 2003 Final Commission Decision. Please see Table 1 below.

Table 1
Review of Effects of Installation and Operation of Emergency Engine

TECHNICAL AREA	SIGNIFICANT ENVIRONMENTAL IMPACT (Y/N)?		NOTES
AIR QUALITY		N	no change
CULTURAL RESOURCES		N	Area for construction is prior filled area
EFFICIENCY		N	No impact
GEOLOGICAL HAZARDS		N	No change
HAZARDOUS MATERIALS HANDLING		N	No change
LAND USE		N	No change
NOISE		N	No Change
PALEONTOLOGICAL RESOURCES		N	Area for construction is prior filled area
BIOLOGICAL RESOURCES		N	Area previously disturbed.

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TECHNICAL AREA	SIGNIFICANT ENVIRONMENTAL IMPACT (Y/N)?		NOTES
PUBLIC HEALTH		N	no change
RELIABILITY		N	No change
SOCIOECONOMICS		N	No change
SOILS		N	No change
TRAFFIC AND TRANSPORTATION		N	Construction traffic minimal
T-LINE SAFETY AND NUISANCE		N	No change
TRANSMISSION SYSTEM ENGINEERING		N	No change
VISUAL RESOURCES		N	Structures will meet painting and visual requirements of Final Decision; See plot plan and visual simulations in Appendices 1.
WASTE MANAGEMENT		N	No change
WATER RESOURCES		N	No change
WORKER SAFETY		N	No change

6.0 COMPLIANCE WITH LAWS, ORDINANCES, REGULATIONS AND STANDARDS (LORS) (Sec. 1769(a)(1)(F))

The proposed building expansion and improvements will not affect compliance with any other LORS requirement. Therefore, the proposed modification is not anticipated to impact SDG&E's ability to comply with the applicable LORS, as listed in Appendix A of the Commission Final Decision.

7.0 POTENTIAL EFFECTS ON PUBLIC AND NEARBY PROPERTY OWNERS (Sec. 1769(a)(1)(G and I))

The requested expansion will not have any environmental impacts and will comply with all applicable LORS. Thus, the proposed equipment change is not anticipated to affect nearby property owners or parties in the application proceedings or the public

8.0 LIST OF PROPERTY OWNERS (Sec. 1769(a)(1)(H))

A list of property owners 1,000 feet of the plant site has previously been provided to the Commission CPM.

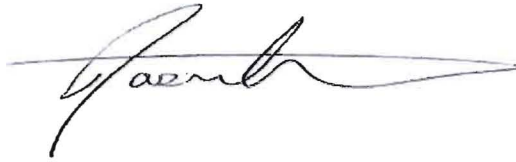
9.0 SUMMARY OF REQUEST

As demonstrated above, construction and use of the expanded building will not have an adverse effect on the public or the environment. The change will not affect compliance with applicable LORS. Accordingly, SDG&E requests that the Energy Commission Staff expedite review of this petition, and request Commission approval of the proposed modified conditions in accordance with Title 20 CCR Section 1769.

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Respectfully Submitted,

A handwritten signature in blue ink, appearing to read 'J. Dobbs', with a long horizontal flourish extending to the right.

Jason T. Dobbs
Compliance Administrator

Dated: NOVEMBER 15, 2011

APPENDIX 1

SITE MAP, FLOOR PLANS, AND VISUAL SIMULATIONS OF PROPOSED BUILDING EXPANSION



SDG&E PALOMAR ENERGY CENTER
SOUTH SWITCHGEAR
PHOTO-SIMULATION 1
10/18/11



BEFORE



AFTER