

DOCKET

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**PETITION FOR CHANGE OF THE PROJECT DESCRIPTION IN THE FINAL
DECISION TO BUILD AN ELEVATOR FOR UNIT ONE HRSG
PALOMAR ENERGY CENTER
(O1-AFC-24C)**

By:

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

Submitted to:

CALIFORNIA ENERGY COMMISSION

February 13, 2012

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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 build an elevator at the base of the Unit 1 Heat Recovery Steam Generator (HRSG). The new elevator will allow access to the top of the Unit 1 HRSG and the intermediate platforms throughout the multilevel power block. Unit two HRSG, the steam turbine, and surrounding equipment become accessible via the existing platforms and walkways adjacent to the upper, intermediate, and lower landings of the elevator door. 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:

New Elevator. SDG&E is proposing to build a new elevator to transport tools, equipment, parts, and workers up and down the various levels of the power block. The elevator will also be utilized if an emergency occurs and it's necessary to remove an injured worker from the upper or intermediate levels within the power plant. The elevator car enclosure will be capable of accommodating the loading and transporting of a stretcher in the horizontal position, so in the event of an emergency an injured worker can be moved to ground level and receive medical attention. The main specifications of the elevator are as follows: Car Size - 4' X 3" W X 6' X 10' L X 7' X 2" H, Model - Alimak

SE-1200, Load Capacity – 2640 or 18 people, Number of Stops – Four, Motor – Electric. The outer surfaces of the elevator car and structure will be painted the plant color (SW 1022 Cubist grey). Plot plans showing the location of the elevator and visual simulations are attached in Appendix 1.

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

The addition of the elevator will improve facility reliability and employee safety by ensuring the availability of equipment that will be used to transport tools, equipment, replacement parts, and workers in a multilevel structure. The transport of tools, equipment, and small replacement parts are typically carried from level to level by a worker. This adds an unnecessary weight burden to every worker assigned to perform tasks on the upper and intermediate levels of the structure. The added weight of the material increases the risk for back injury, heat stress illness, slip-trip-and-fall injury, and other safety incidents related to transporting heavy material by hand. The elevator will reduce the risk of injury by allowing employees to transport material via mechanical means (the elevator) rather than carrying the material up several levels via the stairway.

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 the elevator 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		N	No change

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TECHNICAL AREA	SIGNIFICANT ENVIRONMENTAL IMPACT (Y/N)?		NOTES
MATERIALS HANDLING			
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.
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		N	No change

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TECHNICAL AREA	SIGNIFICANT ENVIRONMENTAL IMPACT (Y/N)?		NOTES
SYSTEM ENGINEERING			
VISUAL RESOURCES		N	Structures will meet painting and visual requirements of Final Decision; See site map (plot plan) and visual simulations in Appendix 1.
WASTE MANAGEMENT		N	No change
WATER RESOURCES		N	No change
WORKER SAFETY		N	Improves capability for injured worker evacuation.

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

The new elevator 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 new elevator 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

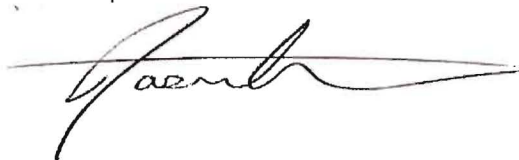
8.0 LIST OF PROPERTY OWNERS (Sec. 1769(a)(1)(H))

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 new gantry crane 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.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Jason T. Dobbs', with a long horizontal flourish extending to the right.

Jason T. Dobbs
Compliance Administrator

Dated: February 13, 2012

APPENDIX 1

SITE MAP AND VISUAL SIMULATIONS OF PROPOSED PROJECT



