

Lodi Energy Center

Operational Combined-Cycle Generating Station

Good morning Commissioners, my name is Eric Veerkamp and I am the Compliance Project Manager for the Lodi Energy Center project. With me this morning is Joseph Hughes, representing Air Quality staff. Also present representing the project owner, is Nancy Matthews with Sierra Research, representing the owner NCPA.

Lodi Energy Center (LEC) is a 296-megawatt, natural gas-fired, combined-cycle generating facility consisting of one combustion turbine generator, one condensing steam turbine generator, one heat recovery steam generator, and associated equipment. The Lodi Energy Center is located in the City of Lodi next to the City's Wastewater Treatment Plant at I-5 and Thornton Road.

The project was certified by the California Energy Commission on April 21, 2010 and began commercial operation in November 2012. The petition was filed with the Energy Commission on April 14, 2013 by Sierra Research on behalf of the project owner, the Northern California Power Agency (NCPA). The petition requests revisions to eight (8) **AIR QUALITY** Conditions of Certification. As a result of subsequent discussions with NCPA that occurred during staff review, as well as a letter from the facility owner requesting four additional modifications, staff is recommending changes to a total of 12 Conditions of Certification.

Staff is recommending 12 modified Conditions of Certification; each is listed below grouped with the by the issue(s) each conditions addresses.

- Increase CO emissions during combustion turbine startup (**AQ-25**) to match actual, as-measured performance rather than the anticipated performance approved in the Energy Commission Final Decision;
- Allow gas turbine combustor tuning necessary for periodic maintenance and calibration, and ensure appropriate recordkeeping for tuning events (**AQ-22, AQ-26, AQ-27, AQ-28, AQ-29, AQ-32, AQ-33, AQ-65, and AQ-66**);
- Revise language which refers to establishing the minimum temperature at which the Selective Catalytic Reduction (SCR) system starts ammonia injection (**AQ-22 and AQ-23**); and
- Define the type of volumetric fuel flow meter that is used to measure the amount of natural gas that is combusted (**AQ-52**)

Energy Commission staff have reviewed the petition to amend and all the modified and newly proposed conditions and have assessed their impacts on environmental quality, public health and safety. Staff has determined that despite the increase in CO emissions, there would be no significant impacts to air quality, and there is no need for additional emission credits, since the area is in attainment for CO; therefore, staff recommends approval of all changes.

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It is staff's opinion that, with the implementation of the revised conditions, the project will remain in compliance with applicable laws, ordinances, regulations, and standards, and the proposed changes to COCs would not result in any significant adverse direct, indirect, or cumulative impacts to the environment (Title 20, California Code of Regulations, Section 1769)

The Staff Analysis, dated July 8, 2013, was docketed and posted to the website on July 8, 2013; the public review period will expire on August 8, 2013. No comments have been received from the public.