

LOS ESTEROS CRITICAL ENERGY FACILITY
AMENDMENT 4

**LOS ESTEROS CRITICAL ENERGY FACILITY
AMENDMENT #4 For 1-AFC-12**

Prepared for
LOS ESTEROS CRITICAL ENERGY FACILITY, LLC

October 2009

Table of Contents

	<u>Page</u>
TABLE OF CONTENTS	I
1.0 INTRODUCTION	1
1.1 OVERVIEW OF AMENDMENT	1
1.2 SUMMARY OF ENVIRONMENTAL IMPACTS.....	2
1.3 CONSISTENCY OF AMENDMENT WITH LICENSE	3
2.0 DESCRIPTION OF PROJECT AMENDMENTS	5
2.1 PROJECT DESCRIPTION	5
2.2 NECESSITY OF PROPOSED CHANGES.....	7
3.0 ENVIRONMENTAL ANALYSIS OF THE PROJECT CHANGES RELATED TO CONSTRUCTION OF THE UNDERGROUND LINE.....	12
3.1 AIR QUALITY	12
3.2 BIOLOGICAL RESOURCES	12
3.3 CULTURAL RESOURCES	12
3.4 LAND USE	12
3.5 NOISE.....	13
3.6 PUBLIC HEALTH	13
3.7 WORKER SAFETY AND HEALTH	13
3.8 SOCIOECONOMICS	13
3.9 AGRICULTURE AND SOILS	13
3.10 TRAFFIC AND TRANSPORTATION	13
3.11 VISUAL RESOURCES	14
3.12 HAZARDOUS MATERIALS MANAGEMENT.....	14
3.13 WASTE MANAGEMENT.....	14
3.14 WATER RESOURCES	14
3.15 GEOLOGIC HAZARDS AND RESOURCES	14
3.16 PALEONTOLOGICAL RESOURCES	14
3.17 TRANSMISSION INTERCONNECTION STUDY	14
3.18 TRANSMISSION LINE SAFETY AND NUISANCE.....	16
3.19 CUMULATIVE IMPACTS	16
3.20 LAWS, ORDINANCES, REGULATIONS, STANDARDS.....	16
4.0 ENVIRONMENTAL ANALYSIS OF THE PROJECT CHANGES RELATED TO UPGRADES TO THE PG&E TRANSMISSION SYSTEM ATTRIBUTED TO THE PROJECT.....	17
5.0 ENVIRONMENTAL ANALYSIS OF THE PROJECT CHANGES RELATED TO THE REVISED CARBON MONOXIDE AND PRECURSOR ORGANIC COMPOUNDS EMISSION LIMITS	19
6.0 PROPOSED MODIFICATIONS TO THE CONDITIONS OF CERTIFICATION RELATED TO THE REQUESTED AMENDMENTS	20
7.0 POTENTIAL EFFECTS ON THE PUBLIC RELATED TO THE REQUESTED AMENDMENTS.....	25
8.0 LIST OF PROPERTY OWNERS.....	26
9.0 POTENTIAL EFFECTS ON PROPERTY OWNERS	28

1.0 Introduction

1.1 Overview of Amendment

The Los Esteros Critical Energy Facility (LECEF or the Project) is a natural gas fired power plant located near the intersection of State Route 237 and Zanker Road in the City of San Jose. The facility consists of an operational 180 megawatt (MW) simple-cycle power plant (LECEF Phase 1) that is being converted to a 320 MW combined-cycle plant (LECEF Phase 2). Los Esteros Critical Energy Facility, LLC, hereinafter "Petitioner," is a wholly-owned indirect subsidiary of Calpine Corporation.

The Commission granted the original license for LECEF on July 2, 2002. (Commission Decision in 01-AFC-12, hereinafter "2002 Decision.") This three-year license covered construction and operation of LECEF Phase 1. In the original license, Petitioner was permitted to temporarily connect to the PG&E 115 kV line via an overhead "tap-line," and to permanently connect the Project via an underground interconnection once the then undeveloped PG&E Los Esteros Substation was constructed. (2002 Decision, p. 6.)

On December 30, 2003, Petitioner filed an Application for Certification with the Commission to continue operation of LECEF Phase 1 beyond June 30, 2005 and to convert LECEF Phase 1 to combined-cycle operation for LECEF Phase 2. The Commission handled these requests in two decisions. The Commission first approved Petitioner's request to relicense LECEF Phase 1 in March 2005. (Order No. 05-0316-04, adopting Commission Decision in 03-AFC-2, hereinafter the "2005 Decision.") The 2005 Decision also authorized LECEF to temporarily interconnect to PG&E's 115 kV Los Esteros-Nortech transmission line by a 152 foot overhead line (rather than permanently connect via an underground line) until the Project converted to combined-cycle operation. In the second decision, the Commission approved Petitioner's application to move forward with conversion of the Project to combined-cycle operation. (Order No. 06-1011-05, adopting Commission Decision in 03-AFC-2, hereinafter "2006 Decision.") As part of the combined-cycle conversion, Petitioner also sought and received authority to change the permanent point of interconnection from the underground line (connecting to the PG&E Los Esteros Substation, as approved in the 2002 Decision), to a 230 kV transmission line connecting to the Silicon Valley Power Substation.

Pursuant to Section 1769 of the Commission's Siting Regulations,¹ this Petition for Modification requests three changes to the 2006 Decision.

First, Petitioner requests that the 2006 Decision be amended to allow Petitioner to use an underground interconnection similar to what was authorized in the 2002 Decision.

Second, on July 28, 2009, the California Independent System Operation (CAISO) completed Transition Cluster Group 1 Phase I Interconnection Study Report for the LECEF Expansion Project, hereinafter "Interconnection Study." The Interconnection Study concludes that as a result of the Project's interconnection to the Los Esteros Substation a new breaker is required at

¹ California Code of Regulations, tit. 20, Section 1769.

LOS ESTEROS CRITICAL ENERGY FACILITY
AMENDMENT #4

the PG&E Los Esteros Substation, and PG&E must reconnector a 1.1 to 1.3 mile portion of the San Jose-Trimble 115 kV line. Reconductoring along the Trimble-San Jose B 115 kV line is a reasonably foreseeable indirect consequence of interconnecting LECEF Phase 2 to the PG&E transmission system.

The Petitioner has prepared a general assessment of the potential environmental effects of reconductoring approximately 1.1 to 1.3 miles of the 2.4 mile Trimble-San Jose B 115 kV line that addresses environmental and other impacts of the reconductoring process. (See Attachments A and B.) This environmental assessment is provided to assist the Commission in its analysis of the potential effects of the proposed interconnection of LECEF Phase 2 to the PG&E transmission system, and the assessment is prepared in order to satisfy the requirements of the California Environmental Quality Act (CEQA). The environmental assessment for the reconductoring of the Trimble-San Jose B line describes the process of reconductoring and the types of environmental impacts that might occur as a result of reconductoring. The assessment also discusses some specific aspects of the reconductoring, such as its location and some likely places for conductor pull and tensioning sites. Project-specific details regarding the locations of the pull and tensioning sites and the specific techniques that will be used for each span, however, will not be available until the specific project is designed. The assessment concludes that this reconductoring project will be accomplished with no significant environmental impacts, as long as certain mitigation measures are followed by PG&E.

Third, Petitioner requests that the 2006 Decision be amended to lower the emission limits for carbon monoxide (CO) and Precursor Organic Compounds (POC). These reductions are necessitated by a requirement of the Bay Area Air Quality Management District's (Air District) rules, which provides that a facility's Authority to Construct (ATC) may be extended if the facility owner has not commenced construction within two years of the date of its issuance only upon assuring that the source meets current "Best Available Control Technology" (BACT) standards. This obligation to assure that a permitted source must periodically undergo review to confirm that it meets current BACT standards at the time of construction is a requirement of the federal Clean Air Act's regulations for nonattainment New Source Review. However, in light of the Commission's plenary jurisdiction over the siting and permitting of power plants, once the Commission has issued a license, no other State or local agency may impose additional or more stringent requirements. It therefore falls to the Commission to adopt any more stringent air quality conditions that may be required to meet current BACT. Based upon Petitioner's updated BACT analysis and a series of communications with the Air District, all emissions limits contained within the Commission's 2006 Decision meet current BACT, except for the limits on CO and POC, which must be reduced, respectively, to 2.0 ppm (1-hour average) and 1.0 ppm (1-hour average) to achieve current BACT. As set forth in the attached analysis (see Evaluation of Best Available Control Technology for LECEF 2, hereinafter "BACT Evaluation," provided herewith as Attachment B), Petitioner asserts that these proposed limits will achieve the current BACT standards. Petitioner, therefore requests modification of two Conditions of Certification: AQ-19 (subparts (c) and (d)) and AQ-22, as set forth below.

1.2 Summary of Environmental Impacts

Section 1769 (a)(1)(E) of the Commission Siting Regulations requires that an analysis be conducted that addresses the impacts a modification might have on the environment and

LOS ESTEROS CRITICAL ENERGY FACILITY
AMENDMENT #4

proposed measures to mitigate any significant adverse impacts. In addition, Section 1769 (a)(1)(F) requires a discussion of the impacts a modification might have on the project's ability to comply with applicable laws, ordinances, regulations and standards (LORS). Section 3.0 of this Amendment addresses potential environmental impacts and consistency of the modification with LORS for the proposed underground transmission interconnection. Section 4.0 of this Amendment provides the same analysis for the PG&E transmission system upgrades. Section 5.0 provides the same analysis for the revised BACT carbon monoxide limit.

Sections 3.0, 4.0, and 5.0 conclude that the amendments requested herein will not result in environmental impacts and that the Project, as amended, will comply with applicable LORS.

Operation of the underground line will not adversely alter or effect the environment. Petitioner requests that the Commission reinstate its previously granted approval of Petitioner's proposal to construct an underground line to the PG&E Los Esteros Substation.

Similarly, the breaker replacement and the partial reconductoring of the San Jose-Trimble 115 kV line, will not adversely affect the environment. As described below, the replacement of conductors along the line is a limited construction activity of short duration. Except where it may be necessary to replace an existing damaged pole or tower, which is not anticipated at this time, reconductoring will not involve ground disturbance. Considering the anticipated selection of tensioning sites and with a range of mitigation measures that will be employed, the reconductoring of the line will not result in any significant adverse impact. Moreover, because the reconducted line will have the same visual appearance as the existing line, the operation of the reconducted line will also have no significant adverse environmental impact.

The proposed amendments to the air quality conditions of the 2006 Decision will not result in an adverse change in the environment. Actually, the resulting change will be beneficial, because it will lower the emission limits for CO and POC from the limits that were previously approved.

1.3 Consistency of Amendment with License

Section 1769 (a)(1)(D) of the Commission Siting Regulations requires a discussion of whether the proposed modifications are based upon new information that changes or undermines the assumptions, rationale, findings, or other bases of the final decision. This section also seeks an explanation of why the requested changes should be permitted.

The amendments requested herein are consistent with the 2002, 2005 and 2006 Decisions.

Petitioner's request to reinstate approval of the underground line is consistent with the Commission's 2002 Decision and 2006 Decision because it is an interconnection that was previously approved by the Commission and because the underground line remains an effective, environmentally preferable means of interconnection. Construction of the underground line will be subject to the Transmission System Engineering (TSE) conditions provided in the 2006 Decision.

The reconductoring of the San Jose-Trimble line is consistent with the 2002 Decision, which anticipated the need for further consideration of the impact of the Phase 2 expansion to the PG&E transmission system upon interconnection to the PG&E's Los Esteros Substation. (See generally, 2002 Decision, pp. 77-82.) In particular, at the time of the 2002 Decision, the CAISO

LOS ESTEROS CRITICAL ENERGY FACILITY
AMENDMENT #4

could only conditionally approve the Project's connection to the Los Esteros Substation due to the uncertainty resulting from the yet undeveloped substation, the uncertainty in the future system configuration, and uncertainty regarding the development of new generation facilities in the area. (2002 Decision, p. 81.) Because this Petition provides information regarding conditions unknown at the time of the 2002 Decision, it is consistent with the intent of the decisions licensing the Project.

The proposed modifications to the air quality conditions are consistent with the 2006 Decision because they achieve the Commission's goal of ensuring that new power plants meet BACT for all criteria pollutants.

2.0 Description of Project Amendments

Consistent with California Energy Commission Siting Regulations Section 1769 (a)(1)(A) and 1769(a)(1)(B), this section includes a complete description of the project modification, as well as the necessity for the amendments.

2.1 Project Description

Underground Transmission Line

Currently, LECEF is interconnected to PG&E's Los Esteros-Nortech 115 kV circuit by way of a 152 foot overhead transmission line. Petitioner requests that the Commission reinstate the 2002 Decision's approval of Petitioner's proposed permanent underground interconnection to the PG&E Los Esteros Substation. This proposed electrical transmission interconnection will connect LECEF to PG&E's grid by way of two new underground three-phase, single-circuit, solid-dielectric, copper-conductor circuits between LECEF's Air Insulated Substation (AIS) and the adjacent Los Esteros 115 kV switchyard. (Figure 2.1-1.) As a result of LECEF's physical proximity to the Los Esteros Substation site, the two transmission circuits will exit the switchyard underground and run to the northwest for approximately 400 feet where they will resurface and be connected to the 115 kV switchyard. Figure 2.2-1 shows the location of the preferred electrical interconnection arrangement. The two 115 kV circuits will each be rated to allow for the removal of one of the circuits without limiting plant output.

The interconnection will not require an additional right-of-way. The underground line will run under property owned by Petitioner, PG&E and the City of Santa Clara. Petitioner granted the City of Santa Clara this property in 2003,² and the grant deed reserved an easement for underground lines. An electrical one-line diagram of the proposed LECEF to the Los Esteros Substation interconnection appears on Figure 2.2-2. Each circuit will be comprised of two (2) solid-dielectric, 2500 kcmil, copper conductors per phase. Each conductor will be installed in a separate underground conduit. The conduit system will begin beneath the LECEF AIS, run northwest, and resurface within the Los Esteros 115 kV switchyard. Once aboveground within the Los Esteros Substation, the 115 kV circuits will be connected to existing 115 kV facilities. (See Figure 2.2-2.)

Upgrades to the PG&E Transmission System

Pursuant to the Interconnection Study, LECEF Phase 2 will require two upgrades to PG&E's transmission system. PG&E is responsible for performance of the upgrades, and Petitioner is responsible for the refundable cost of these upgrades. First, the proposed interconnection of LECEF Phase 2 to the PG&E Los Esteros Substation overstresses a circuit breaker, identified as San Jose "B" Substation 115 kV CB132, and this breaker must be replaced. The second, and more significant upgrade, is the reconductoring of approximately 1.1 to 1.3 miles of the 2.4 mile Trimble-San Jose B 115 kV transmission line.

² Silicon Valley Power currently operates a substation on the indicated property.

LOS ESTEROS CRITICAL ENERGY FACILITY
AMENDMENT #4

The San Jose B – Trimble 115kV transmission line carries two 115 kV electrical circuits between the Trimble Substation, located in San Jose, Santa Clara County, and the San Jose B Substation take-off structure in San Jose, Santa Clara County, California. For the LECEF Phase 2, approximately 1.1 to 1.3 miles of the 115 kV transmission line from the Trimble Substation to Pole 12/81 (Line A), and 0.07 mile of the 115 kV transmission line of Pole 3/23 to the San Jose B Substation takeoff structure (Line B) will need to be reconducted (Figure 2.2-3).

Line A begins at the Trimble Substation take-off structure and runs southwest in the center meridian of Component Drive. The line continues southwest through the intersection of Orchard Parkway and Component Drive through undeveloped fields for 0.45 miles until it reaches a pole adjacent to the Guadalupe River. At this point, the line turns south/southeast for approximately 0.31 miles, crossing Highway 101, just west of the intersection of Highway 101 and Highway 87/Guadalupe Parkway. The line continues in a generally southeast direction crossing the car rental facility for the San Jose International Airport, and running generally parallel to Guadalupe Parkway for 0.25 miles. The line then continues southeast through the car rental facility, running adjacent to the Guadalupe River for 0.18 mile, and eventually crossing the canal to its terminus at pole 12/81, which is located north of Brokaw Road, east of Airport Road, and west of Guadalupe Parkway. Along this portion of the route, the towers are located in medians, parking lots, wooded riparian areas, and fallow fields.

Line B begins at pole 3/23 located north of Coleman Road, and East of Vendome Road, and heads east to the San Jose Substation Take off structure located 0.07 miles to the east of Pole 3/23. The towers are located at the interface between Vendome Road and cross over a landscaped area to the San Jose Substation takeoff structure which is located within a paved area.

Reconductoring of a transmission line involves the replacement of existing electrical transmission wire (conductor) with new wire. To make this replacement, the old conductor must be pulled back through the existing transmission tower supports to a takeup reel. If the existing wire is in good condition, then it is also used to pull in the new conductor, by attaching the two together. Otherwise, the existing wire is used to pull a carrier cable, or sock line onto the tower sheaves. The new conductor is then pulled back through the same supports from the opposite direction from a pull and tensioning site at the other end of the stringing segment. In order for the old line to be reeled off the towers, it must be first disconnected from its insulator clamps and placed on sheaves blocks (pulleys) or travelers that hang from the towers spars. The new line is pulled back through the sheave blocks. Workers then remove the new conductor from the sheaves and attach it to the structure.

Due to limits in the size of conductor reels, the reconductoring must be staged between tower sites that are called deadends. Deadends are towers where the line running in each direction is securely attached to, rather than passing through, the tower support. If deadends are too far apart or terrain interferes, shorter line segments may be chosen. Deadends are often placed at angle towers, where the lines change direction.

Activities between the pull and tensioning sites are generally restricted to (1) accessing the towers (manually by climbing or using a truck-mounted aerial bucket) to place the pulleys, or sheaves blocks, through which the conductor is pulled once it is disconnected and to remove the conductor from the sheave blocks and refasten it once stringing is completed; and (2) work on the tower structure itself to repair or replace spars that are damaged.

LOS ESTEROS CRITICAL ENERGY FACILITY
AMENDMENT #4

Air Quality

LECEF currently consists of four natural gas-fired LM6000PC simple-cycle combustion turbines with a combined nominal output of 180 MW, a fire pump diesel engine, and a one-cell cooling tower. The modified LECEF facility, as approved by the Commission, will have a nominal output of 320 MW as a result of the addition of one nominal 140 MW steam turbine generator.

The LECEF Phase 2 project is required to use BACT to control the emissions of various pollutants from the combustion turbines, in accordance with the requirements of the Air District's New Source Review program. The applicability of BACT requirements under the Air District regulations is discussed in Air District Regulation 2, Rule 2, Section 206. Petitioner has prepared an updated BACT analysis for the combined cycle conversion project and has discussed this analysis with, and obtained the concurrence of Air District staff. (See Attachment C.) The emission rates and control technologies determined to be BACT for LECEF Phase 2 are discussed in detail in this analysis. Separate determinations are provided for normal operation and for startup/shutdown operation.

Petitioner has recently replaced the Selective Catalytic Reduction (SCR) catalyst for each of the four turbines due to poor performance, and the current design calls for the heat recovery steam generators (HRSGs) to be replaced as well. Petitioner also expects to install a new oxidation catalyst as part of the combined cycle conversion. In light of these changes, Petitioner now believes that a CO limit of 2 ppm (1-hour average) and a POC limit of 1 ppm (1-hour average) are achievable for LECEF Phase 2.

The proposed changes in the conditions of certification that will implement this reduction are set forth in Section 5.

2.2 Necessity of Proposed Changes

The proposed modifications related to the undergrounding of a permanent transmission line are necessary to allow continued reliable interconnection between LECEF Phase 2 and the PG&E transmission system. In addition, Petitioner prefers that the Project remain permanently connected to the Los Esteros Substation, rather than move to connect to the Silicon Valley Power Substation, as authorized in the 2006 Decision.

This amendment also addresses the impact of LECEF Phase 2's interconnection to the Los Esteros Substation, which has been analyzed by CAISO. Unlike the circumstances at the time of the 2002 Decision,³ the PG&E system upgrades attributable to the Project are now known. While this information does not affect any conditions of certification, it is new information that assists the Commission in its overall analysis of the potential effects of LECEF Phase 2.

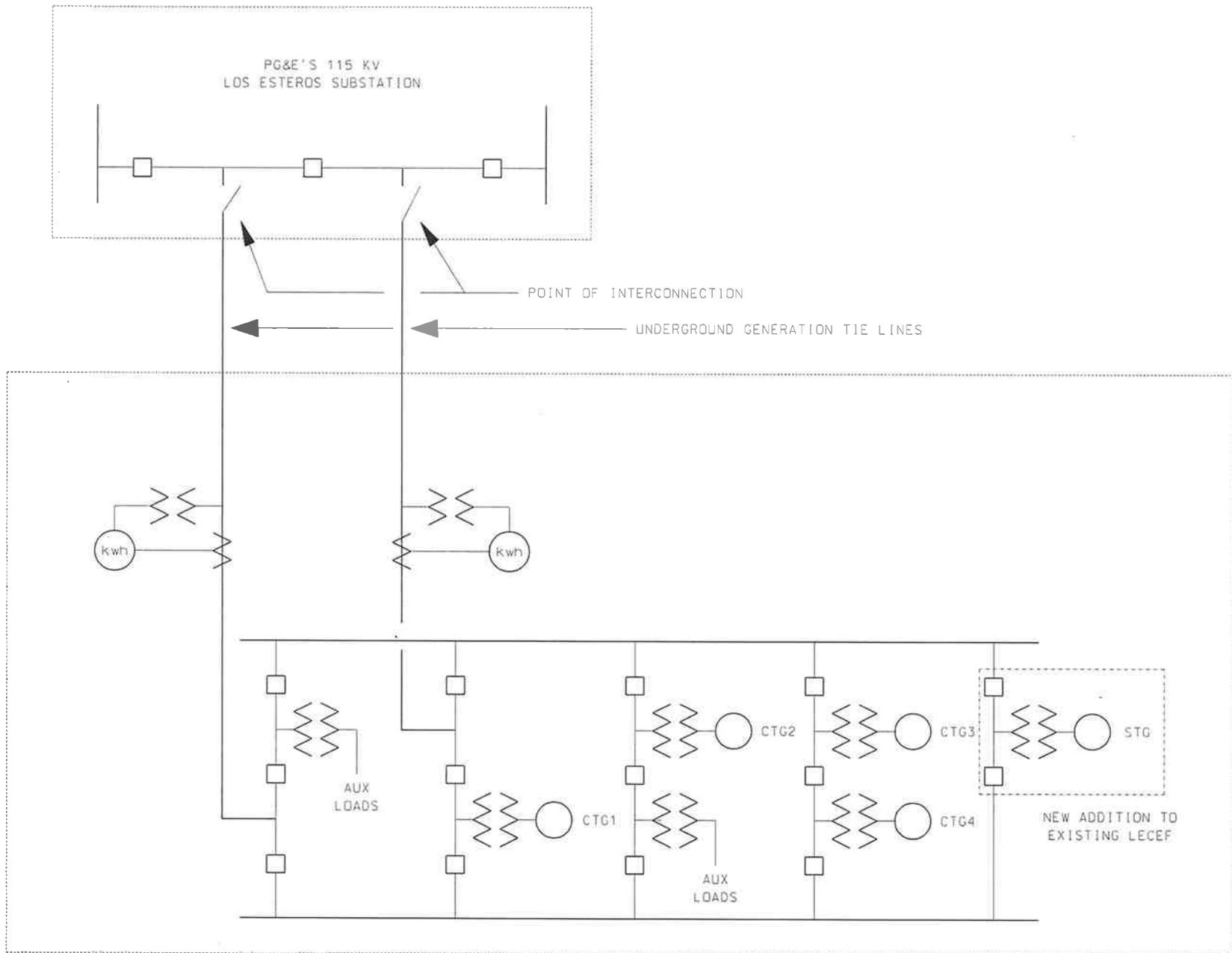
³ In 2002 CAISO's approval of the LECEF interconnection was conditional "because of uncertainty in the future system configuration and uncertainty in the development of other new generation plants in the area. In large part, these uncertainties are tied to the Los Esteros Substation development and are not related to Applicant's temporary tap-line connection to PG&E's Nortech-Trimble 115 kV transmission line." (2002 Decision, p. 81.) Also, the 2006 Decision did not fully address CAISO transmission system impacts because the 2006 Decision considered LECEF's proposed interconnection to the Silicon Valley Power system, which is not a part of the CAISO grid. (2006 Decision, p. 111.)

LOS ESTEROS CRITICAL ENERGY FACILITY
AMENDMENT #4

The proposed air quality modification to the CO and POC emission limits are necessary to achieve the current BACT standard. These reductions are necessitated by the Air District's rules which provide that where a facility has not commenced construction within two years of the date of issuance of its Authority to Construct, the District may extend the Authority to Construct for another two-year period, but only upon finding that the source continues to meet the current BACT standards and offset requirements. (District Reg. 2-1-407.1.2.) This obligation to assure that a permitted source must periodically undergo review that it will meet current BACT standards implements the federal Clean Air Act's regulations for nonattainment New Source Review.

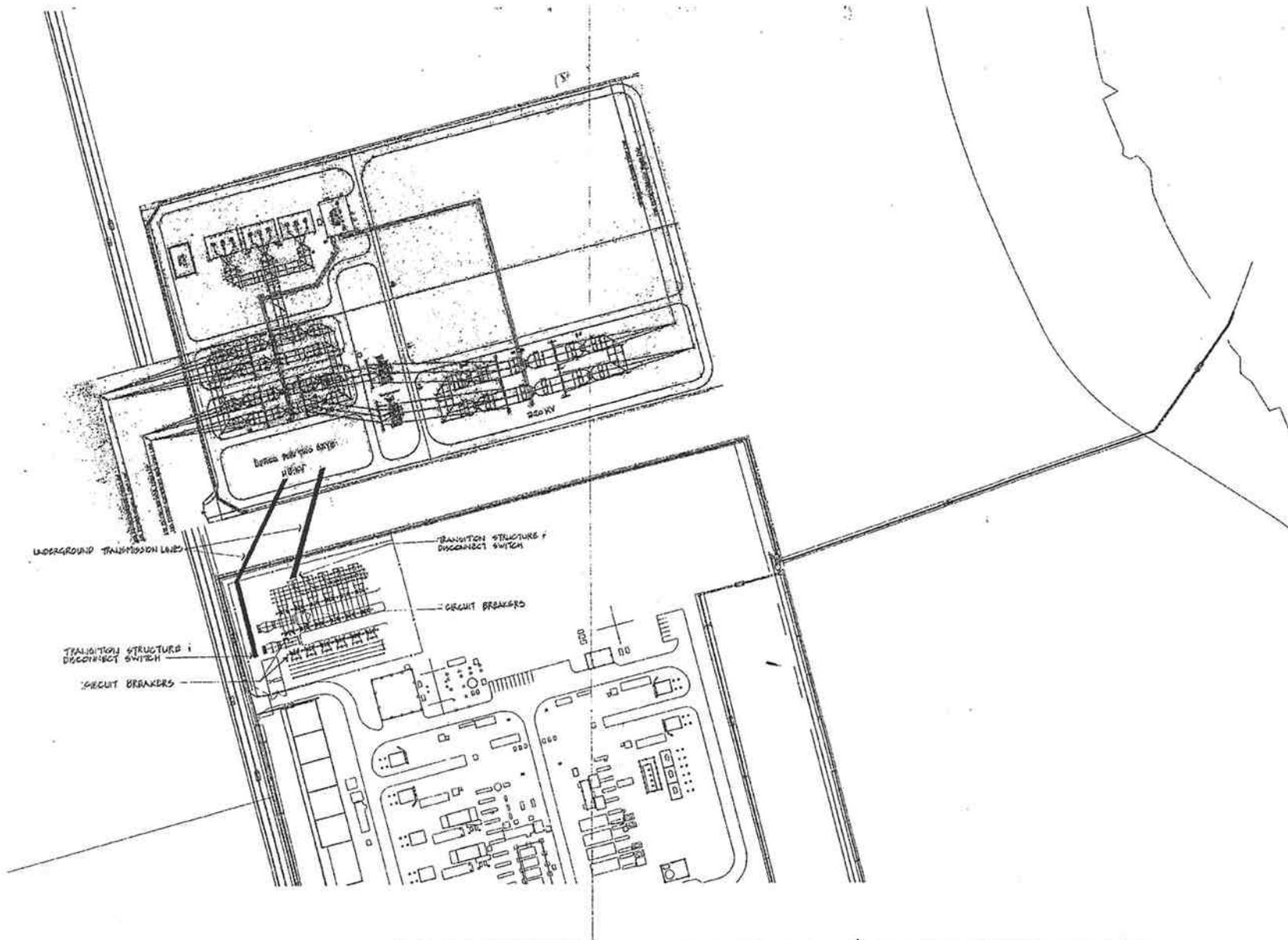
In deference to the Commission's plenary jurisdiction over the permitting of power plants, the Air District, as a ministerial act, issues an Authority to Construct to a power plant subject to the Commission's jurisdiction. The Authority to Construct incorporates the exact conditions of certification which appear within the Commission's Decision and thereby render them directly enforceable by the Air District. (District Reg. 2-3-405.) This is because, once the Commission's decision is final, no other State or local agency may impose additional or more stringent permitting requirements on the facility. (Cal. Public Resources Code § 25500.) Because the Air District may not, of its own volition, adopt additional or more stringent requirements than appear within the Commission's Decision, it falls to the Commission to adopt any more stringent air quality conditions that are necessary to assure that the facility continues to meet BACT.

Based upon this updated analysis, we believe that all the emissions limits contained within the 2006 Decision meet current BACT, except for the limit on CO and POC. Rather, based upon the updated analysis, Petitioner asserts that, for CO, 2.0 ppm (1-hour average) and, for POC, 1.0 ppm (1-hour average) constitutes the current BACT standard for this source category. As set forth in the attached analysis (see Evaluation of Best Available Control Technology for LECEF 2, hereinafter "BACT Evaluation," provided herewith as Attachment B), Petitioner asserts that the proposed limits will achieve the current BACT standards. Petitioner, therefore requests modification to Conditions of Certifications AQ-19(c), AQ-19(d) and AQ-22, as set forth below.



LOS ESTEROS CRITICAL ENERGY FACILITY

Figure 2.2-1



Los Esteros Expansion - Underground Gen-Tie

Figure 2.2-2



VICINITY MAP

LEGEND

- TRANSMISSION LINE A
- TRANSMISSION LINE B
- SAN JOSE SUBSTATION
- TRIMBLE SUBSTATION

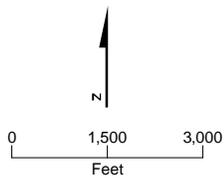


FIGURE 2.2-3
RECONDUCTING ROUTE
 LOS ESTEROS CRITICAL ENERGY FACILITY AMENDMENT
 SAN JOSE, SANTA CLARA COUNTY

3.0 Environmental Analysis of the Project Changes Related to Construction of the Underground Line

The proposed modification is to allow construction and use of an underground transmission line to the PG&E Los Esteros-Nortech 115 kV circuit. The proposed modification does not result in any permanent physical change to the natural environment. When the Commission originally approved this underground transmission line in the 2002 Decision, the Commission thoroughly examined the environmental impacts of the proposal and found that there would be no significant adverse impacts. For these reasons and others described below, the proposed modification will not result in any environmental impacts.

3.1 Air Quality

Construction of an underground transmission line from LECEF to the PG&E Los Esteros Substation will not result in any significant air emission impacts. Air emission impacts from the construction of the overall Project, including the underground line were considered in the 2002 Decision and not found to be significant. (See 2002 Decision, pp. 124-135.) There will be no air quality impacts from operation of the underground line.

3.2 Biological Resources

The construction and operation of the underground transmission line from LECEF to the PG&E Los Esteros Substation will not result in any biological resource impacts. As explained in the original Commission approval of the Project, the proposed underground connection is considered “short” at 220 feet, and it occurs on land already disturbed during construction of the Project and the Substation. (2002 Decision, p. 194 fn. 100.) Thus, “[n]o biological resources [will] be affected.” (*Id.*)

3.3 Cultural Resources

The construction and operation of the underground transmission line from LECEF to the PG&E Los Esteros Substation will not result in any cultural resource impacts. During construction, the Petitioner will comply with any applicable Cultural Resource Conditions in the 2006 Decision.

3.4 Land Use

The underground line and interconnection to the Los Esteros Substation will not require additional right-of-way. The underground line will run under property owned by Petitioner, PG&E and the City of Santa Clara. Petitioner granted the City of Santa Clara this property in 2003, and the grant deed reserves an easement for the underground lines. The

LOS ESTEROS CRITICAL ENERGY FACILITY
AMENDMENT #4

proposed interconnection is on land that is zoned for industrial development and is appropriately zoned for the transmission lines and power plant. The interconnection will be contained entirely within the LECEF and Los Esteros Substation fences, resulting in no additional right-of-way to be acquired at these locations. Thus, the construction and operation of the underground transmission line will not result in any land use impacts.

3.5 Noise

The construction and operation of the underground transmission line will not result in any measurable increase in noise impacts over the existing noise environment.

3.6 Public Health

The operation of the underground transmission line will not result in any criteria or toxic air pollutants. Prior studies conducted by Petitioner show that construction-related emissions of particulate matter from diesel-fueled construction equipment would not produce adverse health effects.⁴ (2002 Decision, p. 156.)

Furthermore, undergrounding of transmission lines results in the lowest electric and magnetic field intensities possible, resulting in no public health impacts from the use of the underground transmission line. (See 2002 Decision, p. 91.)

3.7 Worker Safety and Health

The construction and operation of the underground transmission line will not result in any worker safety and health impacts.

3.8 Socioeconomics

The construction and operation of the underground transmission line will not result in any socioeconomic impacts.

3.9 Agriculture and Soils

The construction and operation of the underground transmission line will not result in any soil and agricultural impacts.

3.10 Traffic and Transportation

The construction and operation of the underground transmission line will not result in any traffic and transportation impacts.

⁴ This discussion does not separate out the individual effect of underground transmission line construction. However, Petitioner maintains that compliance with the existing construction standards is more than sufficient to mitigate any environmental impacts of the underground line construction.

3.11 Visual Resources

The construction and operation of the underground transmission line will not result in any adverse visual resource impacts. Visual quality will be slightly improved by removal of the short overhead line that currently connects these facilities.

3.12 Hazardous Materials Management

The construction and operation of the underground transmission line will not involve the use of any additional hazardous materials not already addressed in prior decisions.

3.13 Waste Management

Any construction waste generated by the construction of the transmission line will be disposed of appropriately according to current regulations. The operation of the underground transmission line will not generate waste materials.

3.14 Water Resources

The construction and operation of the underground transmission line will not result in any water resource impacts.

3.15 Geologic Hazards and Resources

The construction and operation of the underground transmission line will not result in any geologic hazard and resource impacts.

3.16 Paleontological Resources

The construction and operation of the underground transmission line from LECEF to the PG&E Los Esteros Substation will not result in any paleontological impacts.

3.17 Transmission Interconnection Study

At the time of the 2002 Decision, an Interconnection Study for the LECEF Phase 2 expansion was not yet needed, and could not have been conducted due to the fact that Los Esteros Substation had not been developed and other relevant future conditions were not known. However, the Commission anticipated the need for such study, as shown by the following discussion in the 2002 Decision:

The interconnection of a new generator (and any associated modifications to the transmission system), if not properly designed and operated, could adversely impact the reliable operation of the state's electrical power system. The primary roles of the Cal-ISO, as they pertain to the interconnection of new generation, are to ensure and to coordinate the reliable operation of the Cal-ISO controlled electrical grid.

LOS ESTEROS CRITICAL ENERGY FACILITY
AMENDMENT #4

To achieve these goals, the Cal-ISO coordinates the planning of modifications to the grid to ensure they meet the Cal-ISO's Grid Planning Criteria. These criteria essentially incorporate all Western Systems Coordinating Council (WSCC) Reliability Criteria, the North American Electric Reliability Council (NERC) Planning Standards, and local-area-reliability-criteria. Commission staff relies on the Cal-ISO's determinations in formulating recommendations to the Commission. The Commission's review process includes Cal-ISO's determinations concerning conformance with applicable reliability standards, as well as the need for additional transmission facilities and any attendant environmental review necessitated by a particular project.

On June 21, 2001, Cal-ISO gave its preliminary approval for LECEF after reviewing the project's interconnection and costs reports prepared by PG&E, which owns the transmission system. On March 1, 2002, the Cal-ISO granted a conditional final approval based on its review of PG&E's Final Cost Report. The Cal-ISO concurred with PG&E's findings that interconnection of the LECEF generation project would not require the addition of downstream transmission facilities while temporarily connected to PG&E's Nortech-Trimble 115 kV transmission line.

The Cal-ISO's approval was conditional because of the uncertainty in the future system configuration and uncertainty in the development of other new generation plants in the area. In large part, these uncertainties are tied to the Los Esteros Substation development.... (2002 Decision, pp.80-81, citations omitted.)

On July 28, 2009 CAISO completed a Transition Cluster Group 1 Phase I Interconnection Study Report for the LECEF Expansion Project. The Interconnection Study was completed in coordination with PG&E per CAISO Tariff Appendix Y Large Generator Interconnection Procedures (LGIP) for Interconnection Requests in a Queue Cluster Window. This Interconnection Study represents a new planning process. Under this process, interconnection requests are processed together in clusters. Transition cluster projects are grouped for study purposes according to their geographical locations.

This Interconnection Study provides the following:

1. Transmission system impacts caused by the addition of the Group 1 projects,
2. System reinforcements necessary to mitigate the adverse impacts of the Group 1 projects under various system conditions,
3. Preliminary evaluation on the feasibility of the Group 1 projects on the CAISO Controlled Grid, and
4. A list of required facilities and a non binding, good faith estimate of LECEF's cost responsibility and time to construct these facilities.

As discussed throughout this Amendment, the Phase I Interconnection Study attributes two particular transmission system upgrades to LECEF Phase 2: the partial reconductoring of the 115 kV transmission line and the replacement of a circuit breaker at PG&E's Los Esteros Substation.

LOS ESTEROS CRITICAL ENERGY FACILITY
AMENDMENT #4

Following completion of the Interconnection Study, projects must post financial security within 90 calendar days. For those projects that post financial security, the CAISO then prepares a Phase II Interconnection Study. The Phase II Interconnection Study updates analyses performed in the Phase I Interconnection Study to account for the withdrawal of any projects in the cluster and assigns specific cost responsibility for necessary system upgrades. Following the completion of the Phase II Interconnection Study for LECEF, Petitioner will enter into a three party interconnection agreement with the CAISO and PG&E.

3.18 Transmission Line Safety and Nuisance

The 2002 Decision concluded that the LECEF transmission lines, including the underground lines, will not create any safety or nuisance hazards. Based upon the uncontroverted evidence of record, the 2002 Decision found:

1. The proposed transmission line to be constructed in conjunction with the proposed project is not likely to create fire hazards nor to cause safety hazards to aviation.
2. The electric and magnetic field strengths created by the project's transmission lines will be within acceptable limits, and will not create significant adverse human health impacts.
3. The project's transmission lines will not cause an unacceptable interference with radio frequency communications, nor create significant shock hazards to humans.
4. The Conditions of Certification below will ensure that the transmission lines are designed, constructed, and operated in compliance with the applicable laws, ordinances, regulations, and standards specified in the appropriate portion of Appendix A of this Decision. (2002 Decision, p. 91)

These findings remain valid.

3.19 Cumulative Impacts

Because the underground transmission line will not result in any adverse environmental impacts, it will not result in any cumulative adverse effects.

3.20 Laws, Ordinances, Regulations, Standards

The construction and operation of the underground transmission line from LECEF to the PG&E Los Esteros Substation will be in conformance with all applicable LORS.

4.0 Environmental Analysis of the Project Changes Related to Upgrades to the PG&E Transmission System Attributed to the Project

The Petitioner has prepared a general assessment of the potential environmental effects of reconductoring the 1.1 to 1.3 miles of the 2.4 mile Trimble-San Jose B 115 kV line and of the installation of the new breaker. This analysis was prepared to assist the Commission in its analysis of the potential effects of the proposed interconnection of LECEF Phase 2 to the PG&E transmission system. The new breaker and partial reconductoring of the Trimble-San Jose B 115 kV line are reasonably foreseeable indirect consequences of interconnecting LECEF Phase 2 to the PG&E transmission system, and the Commission has a responsibility under CEQA to evaluate the "project as a whole." (See 14 C.C.R. 15051.) Permitting of these actions falls under the jurisdiction of the California Public Utilities Commission because they will take place beyond the first point of LECEF's interconnection with the electric grid. However, the information set forth in this amendment assists the Energy Commission in fulfilling its obligation as the lead agency under the California Environmental Quality Act (CEQA). Therefore, while the Energy Commission does not have permit authority over the reconductoring of the transmission line, this assessment is prepared to satisfy the requirements of CEQA.

Targeted assessments of the biological and cultural effects of the partial reconductoring are provided herewith as Attachments A and B. These assessments briefly describe the process of reconductoring and discuss impacts that might occur as a result of the partial reconductoring. These assessments also detail some specific aspects of the reconductored line segment, such as its location and some likely places for conductor pull and tensioning sites. Project-specific details regarding the locations of the pull and tensioning sites and the specific techniques that will be used for each span, however, will not be available until the specific project is designed. We do not provide a detailed discussion of impacts on issues such as visual resources or noise, since there is no possible environmental impact on these topics.

The "Preliminary Biological Site Assessment for Los Esteros Critical Energy Facility Reconductoring of the Trimble-San Jose B 115kV Transmission Line," hereinafter "Biological Assessment," describes potential biological impacts associated with ground-disturbing activities related to the partial reconductoring of the Trimble-San Jose B 115kV transmission line. (See Attachment A.) The Biological Assessment concludes that the reconductoring should not have any significant effect on the biological resources with the indicated avoidance and mitigation measures. Among the mitigation measures proposed are additional pre-construction surveys for rare plants, pond turtles, bats, migratory bird nests, and habitable owl burrows. Formal wetland and riparian canopy delineations are recommended to assess potential impacts to Guadalupe River channel wetlands and waters, and the river canopy. Also, prior to daily activity, a biological monitor is needed to clear areas where reconductoring activities will take place in order to avoid disturbance of special-status species.

LOS ESTEROS CRITICAL ENERGY FACILITY
AMENDMENT #4

The Biological Assessment also calls for an Initial Study/Mitigated Negative Declaration under CEQA §15060 guidelines to be prepared prior to the reconductoring effort for potentially significant impacts to sensitive biological resources. Resources identified as having potential significant impacts include sensitive natural communities, special-status plants, special-status fish species, special-status nesting birds, migratory birds, and roosting bats.

The “Los Esteros Critical Energy Facility (LECEF); Cultural Resources Assessment” (Attachment B) is provided to address the potential impacts to cultural resources from the project. This assessment explains that the archaeological sensitivity for the reconductoring project is low due to a low degree of ground disturbance and the modern built environment surrounding the reconductoring activities. Significant archaeological and historical sites were not found during the survey. The pedestrian assessment conducted by the cultural resources analyst did not reveal evidence of cultural materials as the area consists mainly of previously disturbed agricultural sediments and road bed material. Although the cultural sensitivity is low, and further considering that the reconductoring effort is not expected to require subsurface construction, if there is an inadvertent discovery of buried cultural resources then mitigation measures are provided.

As shown by the biological and cultural resource assessments, and the discussions herein, the reconductoring project will be accomplished with no significant environmental impacts, as long as certain mitigation measures are followed.

5.0 Environmental Analysis of the Project Changes Related to the Revised Carbon Monoxide and Precursor Organic Compounds Emission Limits

The proposed modifications to Air Quality Conditions of Certification AQ-19(c) in the 2006 Decision will lower the CO emission limit to 2.0 ppm (1-hour average). The modification to AQ-19(d) will lower the POC emission limit to 1.0 ppm (1-hour average). The proposed modifications to AQ-22 will make corresponding changes to the hourly, daily and annual mass emissions limitations to reflect these updated BACT limits. These proposed modifications do not result in new construction or other physical changes to the environment and do not negatively impact air quality or public health. In fact, these proposed modifications will result in a beneficial change by adopting an emission limit substantially lower than the limit set in the 2006 Decision.

6.0 Proposed Modifications to the Conditions of Certification Related to the Requested Amendments

Consistent with the requirements of the Commission Siting Regulations Section 1769 (a)(1)(A), this section addresses the proposed modifications to the Project's Conditions of Certification.

Underground Transmission Line

In regards to construction and operation of the underground line, this petition requests that the Commission reinstate its prior approval of construction and operation of the underground transmission line from LECEF to PG&E's Los Esteros Substation.

Upon approval of the underground lines, the Conditions of Certification for Transmission System Engineering (TSE) in the 2006 Decision will be applicable to the underground lines. However, it will be necessary to amend Conditions of Certification TSE-5 and TSE-7 to remove the references to Silicon Valley Power Substation (SVP) and, in certain instances, substitute reference to CAISO, as follows:

TSE-5 The Petitioner shall ensure that the design, construction and operation of the proposed transmission facilities will conform to all applicable LORS, including the requirements listed below. The Petitioner shall submit the required number of copies of the design drawings and calculations as determined by the CBO.

- a) The power plant switchyard and outlet line shall meet or exceed the electrical, mechanical, civil and structural requirements of CPUC General Order 95 or National Electric Safety Code (NESC), Title 8 of the California Code and Regulations (Title 8), Articles 35, 36 and 37 of the "High Voltage Electric Safety Orders", Cal-ISO standards, National Electric Code (NEC) and related industry standards.
- b) Breakers and busses in the power plan switchyard and other switchyards, where applicable, shall be sized to comply with a short-circuit analysis.
- c) Outlet line crossings and line parallels with transmission and distribution facilities shall be coordinated with the transmission line owner and comply with the owner's standards.
- d) Termination facilities shall comply with applicable ~~SVP~~ Cal-ISO interconnection standards.
- e) The project conductors shall be sized to accommodate the full output from the project.
- f) The Petitioner shall provide to the CPM:

LOS ESTEROS CRITICAL ENERGY FACILITY
AMENDMENT #4

- i) Any Facility Study, Detailed Facility Study (DFS) or System Impact Study completed after December 2, 2004, including, if applicable, a description of facility upgrades, operational mitigation measures, and/or Special Protection System (SPS) sequencing and timing,
 - ii) An executed Petitioner, PG&E, and Cal-ISO Facility Large Generator Interconnection Agreement.
- g) The Petitioner shall remove the overhead conductors of the existing tap line and remove the supporting poles.

Verification: At least 60 days prior to the start of construction of transmission facilities (or a lesser number of days mutually agree to by the Petitioner and CBO), the Petitioner shall submit to the CBO for approval:

- a) Design drawings, specifications and calculations conforming with CPUC General Order 95 or NESC, Title 8, Articles 35, 36 and 37 of the “High Voltage Electric Safety Orders”, NEC, applicable interconnection standards and related industry standards, for the poles/towers, foundations, anchor bolts, conductors, grounding systems and major switchyard equipment.
- b) For each element of the transmission facilities identified above, the submittal package to the CBO shall contain the design criteria, a discussion of the calculation method(s), a sample calculation based on “worst case conditions” [footnote omitted] and a statement signed and sealed by the registered engineer in responsible charge, or other acceptable alternative verification, that the transmission element(s) will conform with CPUC General Order 95 or NESC, Title 8, California Code of Regulations, Articles 35, 36 and 37 of the, “High Voltage Electric Safety Orders”, NEC, applicable interconnection standards, and related industry standards.
- c) Electrical one-line diagrams signed and sealed by the registered professional electrical engineer in responsible charge, a route map, and an engineering description of equipment and the configurations covered by requirements TSE-5 a) through g) above.
- d) The final DFS, including a description of facility upgrades, operational mitigation measures, and/or SPS sequencing and timing if applicable, shall be provided concurrently to the CPM and the CBO.

TSE-7 The Petitioner shall provide the following Notice to the California Independent System Operator (Cal-ISO) and ~~SVP~~ PG&E prior to synchronizing the facility with the California transmission system:

1. At least one week prior to synchronizing the facility with the grid for testing, provide the Cal-ISO a letter stating the proposed date of synchronization; and
2. At least one (1) business day prior to synchronizing the facility with the grid for testing, provide telephone notification to the ISO Outage Coordination Department.

LOS ESTEROS CRITICAL ENERGY FACILITY
AMENDMENT #4

Verification: The Petitioner shall provide copies of the Cal-ISO letter to the CPM and ~~SVP~~ PG&E when it is sent to the Cal-ISO one (1) week prior to initial synchronization with the grid. The Petitioner shall contact the Cal-ISO Outage Coordination Department, Monday through Friday, between the hours of 0700 and 1530 at (916) 351-2300 at least one business day prior to synchronizing the facility with the grid for testing. A report of conversation with the Cal-ISO shall be provided electronically to the CPM one (1) day before synchronizing the facility with the California transmission system for the first time.

Upgrades to the PG&E Transmission System

The impact of LECEF Phase 2 to the transmission system, and the related upgrades identified by the Interconnection Study, do not require modification of any conditions of certification.

Air Quality

Petitioner requests that Air Quality Conditions of Certification 19(c) and 22 be revised as follows:

AQ-19 Emissions Limits: The owner/ operator shall operate the facility such that none of the following limits are exceeded:

- a. The emissions of oxides of nitrogen (as NO₂) from emission points P-1, P-2, P-3, and P-4 (combined exhaust of gas turbine/HRSG power trains S-1 & S-7, S-2 & S-8, S-3 & S-9, and S-4 & S-10, respectively) each shall not exceed 2.0 ppmvd @ 15% O₂ (1-hour rolling average), except during periods of gas turbine startup and shutdown as defined in this permit. The NO_x emission concentration shall be verified by a District-approved continuous emission (Basis: BACT.)
- b. Emissions of ammonia from emission points P-1, P-2, P-3, and P-4 (combined exhaust of gas turbine/HRSG power trains S-1 & S-7, S-2 & S-8, S-3 & S-9, and S-4 & S-10, respectively) each shall not exceed 10 ppmvd @ 15% O₂ (3-hour rolling average), except during periods of start-up or shutdown as defined in this permit. The ammonia emission concentration shall be verified by the continuous recording of the ratio of the ammonia injection rate to the NO_x inlet rate into the SCR control system (molar ratio). The maximum allowable NH₃/NO_x molar ratio shall be determined during any required source test, and shall not be exceeded until reestablished through another valid source test. (Basis: BAAQMD Toxics Risk Management Policy.)
- c. Emissions of carbon monoxide (CO) from emission points P-1, P-2, P-3, and P-4 (combined exhaust of gas turbine/HRSG power trains S-1 & S-7, S-2 & S-8, S-3 & S-9, and S-4 & S-10, respectively) each shall not exceed ~~9~~ 2.0 ppmvd @ 15 % O₂ (~~3~~ 1-hour rolling average), except during periods of start-up or shutdown as defined in this permit. The CO emission concentration shall be verified by a District-approved CEMS and during any required source test. (Basis: BACT.)
- d. Emissions of precursor organic compounds (POC) from emission points P-1, P-2, P-3, and P-4 (combined exhaust of gas turbine/HRSG power trains S-1 & S-7, S-2 & S-8, S-3 & S-9, and S-4 & S-10, respectively) each shall not exceed ~~2~~ 1 ppmvd @ 15% O₂ (~~3~~

LOS ESTEROS CRITICAL ENERGY FACILITY
AMENDMENT #4

1-hour rolling average), except during periods of gas turbine startup or shutdown as defined in this permit. The POC emission concentration shall be verified during any required source test. (Basis: BACT.)

- e. Emissions of particulate matter less than ten microns in diameter (PM10) from emission points P-1, P-2, P-3, and P-4 (combined exhaust of gas turbine/HRSG power trains S-1 & S-7, S-2 & S-8, S-3 & S-9, and S-4 & S-10, respectively) each shall not exceed 2.5 pounds per hour. The PM10 mass emission rate shall be verified during any required source test. (Basis: BACT & cumulative increase.)
- f. Emissions of oxides of sulfur (as SO₂) from emission points P-1, P-2, P-3, and P-4 (combined exhaust of gas turbine/HRSG power trains S-1 & S-7, S-2 & S-8, S-3 & S-9, and S-4 & S-10, respectively) each shall not exceed 1.8 pounds per hour. The SO₂ emission rate shall be verified during any required source test. (Basis: BACT & cumulative increase.)
- g. Compliance with the hourly NO_x emission limitations specified in part 19(a), at emission points P-1, P-2, P-3, and P-4, shall not be required during short-term excursions, limited to a cumulative total of 320 hours per rolling 12 month period for all four sources combined. Short-term excursions are defined as 15-minute periods designated by the Owner/Operator that are the direct result of transient load conditions, not to exceed four consecutive 15-minute periods, when the 15-minute average NO_x concentration exceeds 2.0 ppmv, dry @ 15% O₂. Examples of transient load conditions include, but are not limited to the following:
 - (1) Initiation/shutdown of combustion turbine inlet air cooling
 - (2) Initiation/shutdown of combustion turbine water mist or steam injection for power augmentation
 - (3) Rapid combustion turbine load changes
 - (4) Initiation/shutdown of HRSG duct burners
 - (5) Provision of ancillary services and automatic generation control at the direction of the California Independent System Operator (Cal-ISO)

The maximum 1-hour average NO_x concentration for short-term excursions at emission points P-1, P-2, P-3, and P-4 each shall not exceed 5 ppmv, dry @ 15% O₂. All emissions during short-term excursions shall be included in all calculations of hourly, daily and annual mass emission rates as required by this permit.

Verification: The Petitioner/operator shall verify compliance with this Condition of Certification in each quarterly report required by Condition of Certification **AQ-34**.

AQ-22 Mass Emission Limits: The owner/operator shall operate the LECEF so that the mass emissions from the S-1, S-2, S-3 & S-4 Gas Turbines and S-7, S-8, S-9, & S-10 HRSGs do not exceed the daily and annual mass emission limits specified below. The owner/operator shall

LOS ESTEROS CRITICAL ENERGY FACILITY
AMENDMENT #4

implement process computer data logging that includes running emission totals to demonstrate compliance with these limits so that no further calculations are required.

Mass Emission Limits (Including Gas Turbine Start-ups and Shutdowns)

Pollutant	Each Turbine / HRSG Power Train (lb/day)	All 4 Turbine / HRSG Power Trains (lb/day)	All 4 Turbine / HRSG Power Trains (ton/yr)
NO _x (as NO ₂)	252.4	1,009.6	99
POC	80.2 <u>64.1</u>	320.8 <u>256.4</u>	28.3 <u>22.8</u>
CO	417.2 <u>220.3</u>	1,668.8 <u>881.1</u>	98.5 <u>80</u>
SO _x (as SO ₂)	41.6	166.4	8.4
PM ₁₀	60	240	43.8
NH ₃	198	792	118

The daily mass limits are based upon calendar day per the definitions section of the permit conditions. The annual mass limit is based upon a rolling 8,760-hour period ending on the last hour. Compliance shall be based on calendar average one-hour readings through the use of process monitors (e.g., fuel use meters) CEMS, source test results, and the monitoring, record keeping and reporting conditions of this permit. If any part of the CEM involved in the mass emission calculations is inoperative for more than three consecutive hours of plant operation, the mass data for the period of inoperative shall be calculated using a District-approved alternate calculation method. (Basis: cumulative increase, record keeping.)

Verification: The Petitioner/operator shall verify compliance with this Condition of Certification in each quarterly report required by Condition of Certification AQ-34.

7.0 Potential Effects on the Public Related to the Requested Amendments

Consistent with the requirements of the Commission Siting Regulations Section 1769 (a)(1)(G), this section addresses the proposed Amendment's effects on the public.

The construction and operation of the underground transmission line from LECEF to the PG&E Los Esteros Substation will not adversely impact the public. These considerations were addressed in the original 2002 Decision approving the proposed underground line. The Commission has concluded that the construction and operation of the underground line does not pose an aviation hazard, a fire hazard, or a shock hazard as it will be designed according to GO-128 requirements. (2002 Decision pp. 90-92.)

The upgrades required by the Interconnection Study are imposed to maintain system reliability, and are therefore provide a public benefit. The reconductoring process, however, may impose limited public inconveniences depending on which towers are needed to reconnector the line, as towers along the reconducted route stand in road medians, parking lots, wooded riparian areas, and fallow fields. Calpine does not yet know the exact towers that will be accessed by PG&E for the reconductoring process. However, whatever effect reconductoring may have, it will be temporary and limited to discrete tower locations along the Trimble-San Jose B line.

Revision of the Air Quality analysis in the 2006 Decision also does not adversely affect the public because the proposed amendments propose lowering the CO emission limits for the Project and will have a beneficial impact on air quality and public health, as explained in Section 4.0.

8.0 List of Property Owners

Consistent with the Commission Siting Regulations Section 1769(a)(1)(H), this section lists the property owners affected by the proposed modifications:

PG&E:

Mr. Tom Marki
Project Manager
4400 Mansfield
Danville, CA 94506
Phone: 925-736-3723
Cell Phone: 415-302-6788
Email: TxM4@pge.com

City of Santa Clara:

City Manager's Office
Jennifer Sparacino, City Manager
City Hall
1500 Warburton Avenue
Santa Clara, CA 95050

Property Owners Listed for the Reconductoring Route:

City Of San Jose
480 Vendome Street
San Jose, CA 95110
[With regard to Parcel Nos. 259 15 082 and 259 15 080]

City Of San Jose
W Empire Street
San Jose, CA 95110
[With regard to Parcel Nos. 259 13 041, 259 13 083, and 259 13 084]

S C V W D
5750 Almaden Expressway
San Jose, CA 95118
[With regard to Parcel Nos. 259 14 019, 259 14 009, 259 15 018, 259 15 041, and 259 22 061]

LOS ESTEROS CRITICAL ENERGY FACILITY
AMENDMENT #4

City Of San Jose
200 E Santa Clara Street #5th
San Jose, CA 95113
[With regard to Parcel No. 259 15 055]

City Of San Jose
Anita Street
San Jose, CA 95110
[With regard to Parcel No. 259 15 074]

City of San Jose
No site address
[With regard to Parcel No. 259 15 072]

Pacific Gas & Electric Co
260 Coleman Ave
San Jose, CA 95110
[With regard to Parcel No. 259 22 060]

Union Pacific Railroad Co.
1400 Douglas Street
Omaha, NE 68179
[With regard to Parcel No. 259 54 024]

Cousins San Jose Marketcenter LLC
191 Peachtree Street NE #3600
Atlanta, GA 30303
[With regard to Parcel Nos. 259 54 047 and 259 54 048]

9.0 Potential Effects on Property Owners

Consistent with the Commission Siting Regulations Section 1769(a)(1)(I), this section addresses potential effects of the proposed Amendment on nearby property owners, the public, and parties in the application proceeding.

Construction of the underground line will affect already developed property owned by Petitioner and PG&E. Transmission system upgrades required by the Interconnection Study will also only affect property and right-of-way owned by PG&E.

Changes to the Conditions of Certification for Air Quality will not have an adverse effect on property owners, the public or parties to the application proceeding.