Starwood Power-Midway, LLC Peaking Project (06-AFC-10) Amendment No. 2

Submitted to the California Energy Commission October 2008

Submitted by

Starwood Power-Midway, LLC

With support from

URS

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October 27, 2008

Chris Davis
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California Energy Commission
1516 Ninth Street
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Subject: Starwood Power-Midway, LLC Peaking Project Amendment (06-AFC-10), Amendment No. 2
URS Project No. 27656131.00700

Dear Mr. Davis:

On behalf of Starwood Power-Midway, LLC, URS Corporation Americas (URS) hereby submits Amendment No. 2 for the Starwood Power-Midway Project.

I certify under penalty of perjury that the foregoing is true, correct, and complete to the best of my knowledge. I also certify that I am authorized to submit Amendment No.2 for the Starwood Power-Midway Project on the behalf of Starwood Power-Midway, LLC.

Sincerely,

URS CORPORATION

Angela Leiba
Project Manager

AL:ml

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EXECUTIVE SUMMARY

Starwood Power-Midway, LLC hereby petitions for a proposed incremental change to the Starwood Power-Midway, LLC Peak Project Midway 2006 AFC (06-AFC-10). Starwood Power-Midway, LLC is proposing an incremental change to the Midway 2006 AFC that includes an equipment relocation adjustment as shown in Figures 1 and 2.

The Starwood Power-Midway, LLC Peak Project (Midway) is a simple-cycle electric generating facility. Once constructed, the facility will utilize two (2) FT8-3 SwiftPac Combustion Turbine Generator (CTG) units installed in a simple-cycle power plant arrangement. The approved Midway Project is located on a 5.6 acre site within Fresno County, located adjacent to the Panoche Hills and east of the San Benito County line. It is approximately 50 miles west of the City of Fresno and approximately 2.0 miles east of Interstate 5 (I-5).

Starwood Power-Midway, LLC is proposing an incremental change to the Midway 2006 AFC that includes relocation of the approved gas line route, meter set, and pressure regulators. The new route for the gas pipeline will change to reflect the new location of the PG&E supply and meters; however it will remain completely on the Midway property. The approved on-site 6-inch gas pipeline is approximately 540-feet in length and extends from the on-site meter set located at the western boundary of the Project site, north to tie into the PG&E Backbone Transmission Line running along (parallel to) West Panoche Road at the northwest border of the Project site. The revised gas pipeline is proposed as a 4-inch pipe, would extend for 600-feet, and tie into the PG&E Backbone Transmission line running perpendicular to West Panoche Road and along the northeast border of the Project site.

In addition, the meter set and pressure regulators will be relocated from the approved location at the western boundary of the Project site, to an off-site leased fenced 25 X 75-foot area located just outside the southeastern corner of the Project site. This will allow for Project connection to the back bone PG&E main Backbone Transmission line which runs through the PG&E Pipeline Right Of Way (ROW). All proposed incremental changes to the Midway Project are further described in Section 2.0, Project Description.

The proposed incremental change to the Midway Project is designed and structured to assure compliance with CEC Siting Regulations (California Code of Regulations [CCR] Title 20, Section 1769, Post Certification Amendments and Changes). This Amendment addresses specific requirements set forth by the CEC. Section 1.0 provides an overview of the proposed incremental change to the Midway Project and review of the ownership of the Project, the necessity for the proposed change, and the consistency of the changes with the Commission Decision certifying the facility. Section 2.0 provides a complete description of the proposed modifications as well as associated revisions to the 2006 AFC (06-AFC-10) Project Description, including updated drawings. Section 3.0 assesses the potential environmental effects of the proposed changes in terms of each environmental discipline area. This assessment indicated the adoption of this Amendment will not result in any significant, unmitigated adverse environmental impacts. In addition, the Midway Project will continue to comply with all applicable laws, ordinances, regulations and standards (LORS). The findings contained in the Midway 2006 AFC and the CEC Conditions of Certifications contained in the January 2008 Final Commission Decision are still applicable to this Amendment.

SECTION 1 INTRODUCTION

1.1 OVERVIEW OF AMENDMENT

Starwood Power-Midway, LLC hereby petitions for a proposed incremental change to the Starwood Power-Midway, LLC Peak Project 2006 AFC (06-AFC-10). Starwood Power-Midway, LLC is proposing an incremental change to the Midway 2006 AFC that includes relocation of the approved gas line, meter set, and pressure regulators. The route for the gas pipeline will change to reflect the new location of the PG&E supplied meters; however it will remain completely on the Midway property. The meter set and pressure regulators will be relocated to a fenced 25 X 75 area located just outside the southeastern corner of the Project site to connect to a back bone transmission line which runs through the PG&E Pipeline Right Of Way (ROW), further described in Section 2.0, Project Description. The Starwood Power-Midway, LLC Peaking Project certified by the CEC in January 2008 will be referred to in this document as "Midway" or the "Midway Project." The proposed incremental change to the Midway Project will be referred to in this document as the "proposed incremental change to the Midway Project".

The proposed incremental change to the Midway Project contains all of the information that is required pursuant to the California Energy Commission's (CEC or Commission) Siting Regulations (California Code of Regulations [CCR] Title 20, Section 1769, Post Certification Amendments and Changes). 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.

Table 1-1
Informational Requirements For Post-Certification Amendments And Changes

Section 1769(a)(1) Requirement	Section(s) of Petition Fulfilling Requirement
(A) A complete description of the proposed modifications, including new language for any conditions that will be affected.	Section 2.0 – Proposed modifications; Section 3.0 – Proposed changes to conditions of certifications, where necessary, are located at the end of this section.
(B) A discussion of the necessity for the proposed modifications.	Section 2.2
(C) If the modification is based on information that was known by the petitioner during the certification proceeding, an explanation why the issue was not raised at that time.	Section 1.3
(D) If the modification is based on new information that changes or undermines the assumptions, rationale, findings, or other bases of the final decision, an explanation of why the change should be permitted.	Section 1.4
(E) An analysis of the impacts the modification may have on the environment and proposed measures to mitigate any significant adverse impacts.	Section 3.0
(F) A discussion of the impact of the modification on the facility's ability to comply with applicable laws, ordinances, regulations, and standards.	Section 3.0

Table 1-1
Informational Requirements For Post-Certification Amendments And Changes
(Continued)

Section 1769(a)(1) Requirement	Section(s) of Petition Fulfilling Requirement
(G) A discussion of how the modification affects the public.	Section 4.0
(H) A list of property owners potentially affected by the modification.	Section 5.0
(I) A discussion of the potential effect on nearby property owners, the public and the parties in the application proceedings.	Section 6.0

1.2 SUMMARY OF ENVIRONMENTAL IMPACTS

The CEC Siting Regulations require that an analysis be conducted to address the potential impact the proposed incremental change to the Midway Project may have on the environment and proposed measures to mitigate any potentially significant adverse impacts (Title 20, CCR, Section 1769 [1][a][E]). The regulations also require a discussion of potential impacts the proposed incremental change to the Midway Project may have on the facility's ability to comply with the applicable Laws, Ordinances Regulations and Standards (LORS) (Section 1769 [1][a][F]). Section 3.0 of this Amendment includes a discussion of potential environmental impacts associated with the proposed incremental change to the Midway Project as well as a discussion of the consistency of the modification to LORS. Section 3.0 concludes that there will be no significant environmental impacts associated with implementing the actions specified for the proposed incremental change to the Midway Project and that the Midway Project will remain in compliance with all applicable LORS.

1.3 EXPLANATION FOR MODIFICATION

The Siting Regulations require a discussion of whether the modification for the proposed incremental change to Midway Project is based on information known by the Petitioner during the certification proceeding (Title 20, CCR, Sections 1769 [a][1][C]).

After filing the Starwood Power-Midway Project Gas Interconnection and Services application several years ago, PG&E's provided a proposed plan to tie the Project's gas line into the 6-inch tap on the PG&E Backbone Transmission line which also provides gas to the CalPeak Power Plant. This Backbone Transmission line runs parallel to and along the shoulder of West Panoche Road. All plans and submittals for bringing gas to the Project were predicated on this design. After receiving the CEC Final Commission Decision and Authorization to Construct the Starwood plant, PG&E informed the Project that Starwood could not tap into the CalPeak line, as this would prevent CalPeak and Starwood from receiving the Backbone Transmission rate. The Backbone rate requires a single customer to be tied to the transmission line and adding Starwood Midway to the CalPeak tap would violate the tariff. Starwood is required to interconnect and provide Backbone Transmission service as a condition of the PG&E PPA. Starwood believed that PG&E's original interconnection recommendation took this fact into consideration.

As an alternative to the original plan (for Starwood to tie into the CalPeak line), PG&E recommended that Starwood tie to a new 6-inch tap on the back bone transmission line which runs parallel to West Panoche Road that is 900 feet down the road from the original tie point. After further consideration of gas pressure requirements, PG&E changed the dimensions of the tap to 8 inches and 900 feet of 8-inch line, representing a substantial increase in cost along with the added impacts of 900 feet of pipeline construction along West Panoche Road.

Addressing the impacts of installing 900 feet of new 8" gas pipe and the increased cost, PG&E and Starwood explored the option to move the Starwood gas connection point to another back bone transmission line which runs through the PG&E Pipeline Right Of Way (ROW) that is on the east side of the Starwood Midway property. This approach eliminates the need to install 900 feet of pipe along West Panoche Road. PG&E agreed that this was a more efficient and effective way to provide gas to the Midway site. By utilizing this alternative, PG&E will only install approximately 60 feet of pipe to reach the PG&E meter run and all of the pipe up to the meter run will be inside the existing PG&E gas line ROW. Starwood is now required to provide a fenced area for the new 25 X 75-foot meter run, which is not within the existing PG&E gas line ROW.

The Petitioner was not aware that PG&E did not take into account the fact that adding Midway to the CalPeak gas connection tap would violate the tariff. In order to avoid this conflict, the gas line and meter set location was revised.

1.4 CONSISTENCY OF AMENDMENT WITH LICENSE

The CEC Siting Regulations also require a discussion of whether the modifications are based upon new information that changes or undermines the assumptions, rationale, findings, or bases of the final decision (Title 14, CCR Section 1769 [a][1][D]). If the Midway Project is no longer consistent with the certification, the Project must provide an explanation why the modification should be permitted.

The proposed incremental change to the Midway Project does not undermine the assumptions, rational, findings, or other bases of the final decision for the Midway 2006 AFC by the CEC.

SECTION 2 DESCRIPTION OF PROPOSED AMENDMENT

2.1 STARWOOD POWER-MIDWAY, LLC PEAKING PROJECT

This section includes a complete description of the proposed incremental change to the Starwood Power–Midway, LLC Peaking Project (Midway).

2.2 MIDWAY

The Midway Project is approximately 50 miles west of the City of Fresno and approximately 2 miles east of Interstate 5 (I-5). It is located within Fresno County adjacent to the Panoche Hills and east of the San Benito County line. It is a simple-cycle electric generating facility. The facility includes two (2) FT8-3 SwiftPac Combustion Turbine Generator (CTG) units installed in a simple-cycle power plant arrangement. The gas turbines are equipped with a water injection system to reduce production of nitrous oxides (NO_x), a selective catalytic reduction system (SCR) with 19% aqueous ammonia to further reduce NO_x emissions, and an oxidation catalyst to reduce carbon monoxide (CO) emissions. The nominal plant power rating is 120 megawatts (MW).

2.3 DESCRIPTION OF PROPOSED GAS LINE AND METER CHANGE

The proposed incremental change to the Midway Project includes relocation of the approved gas pipeline route and connection point to a back bone transmission line which runs through the PG&E Pipeline Right Of Way (ROW) that is on the east side of the Midway Project site. By utilizing this alternative, PG&E will only need to install approximately 60 feet of pipe to reach the PG&E meter run and all of the pipe up to the meter run will be inside the existing PG&E gas line ROW. Starwood is now required to provide a fenced area for the new 25 X 75-foot meter run, which is not within the existing PG&E gas line ROW. The Midway site is fully utilized and grading plans and surface designs have been completed, reviewed, and construction is currently underway. The Petitioner's plan to provide this additional 25 X 75-foot area for the meter run is with an easement of additional land just outside and parallel to the Project site. The Petitioner has negotiated with the Project's landlord to provide an easement, which is contiguous to the southern Midway property line, approximately 25 feet wide and 75 feet long. The easement is located on a land locked property which is triangular in shape at 200 X 200 X 100 feet, and is surrounded by the Midway site leasehold, the Wellhead Power plant and the PG&E gas line ROW. The southernmost border of the easement will be the Midway property line and will extend from the Midway property 25 feet south and continue in an east west direction for 75 feet.

A plot plan illustrating the approved gas meter and pipeline configuration is provided as Figure 1. A plot plan and aerial image illustrating the proposed gas meter and pipeline configuration are provided as Figures 2 and 3.

The route for the gas pipeline on the Project site will change to reflect the new location of the PG&E supply and meters; however it will remain completely on the Midway property. The approved on-site gas pipeline was approximately 540-feet in length. The new pipeline length is 600-feet. This is considered a minor change. Also the pressure regulators downstream of the meter run, which are required to regulate gas pressure to the gas turbines, be will moved off the Project site and onto the new easement.

2.4 PROPOSED CHANGES TO MIDWAY 2006 AFC (06-AFC-10) PROJECT DESCRIPTION

Section 3.4.1 Page 3-5:

- A Natural Gas Fuel system that will supply natural gas to the gas turbines in a manner that meets the required engine specifications (*i.e.*, pressure, flow, quality). The project will tie into ~~the existing 6" diameter fuel natural gas supply pipeline for the CalPeak Panoche plant, which in turn ties into~~ the PG&E Backbone Transmission line running ~~along~~ perpendicular ~~West~~ to West Panoche Road and along the northeast border of the project site. A ~~separate~~ new tap, meter and ~~6~~4-inch line will supply Midway with natural gas.

Section 3.7 Page 3-37:

The project includes both a natural gas supply pipeline and a water supply pipeline. The natural gas line would tap into an existing PG&E backbone transmission line and would consist of a ~~6~~ 4-inch line~~, approximately 50 feet of which would be off-site and approximately 600 feet on-site~~. The PG&E transmission line ~~tie-in is adjacent to the entrance of the~~ runs along the northeast border of the project site ~~border. property. The underground water pipeline would consist of approximately 1,200 feet of 3-inch line piped from the CalPeak Panoche site.~~

Section 3.7.1 Page 3-37:

Natural gas will be delivered to the plant site from a connection to a PG&E ~~trunk~~backbone transmission line. A metering and pressure regulator station will be provided on ~~the PG&E right-of-way northwest~~ a 25 x 75-foot easement on the northeast corner of the site. The gas will be metered by PG&E as it enters the project site. Additional flow metering will be provided at each CTG.

Section 3.7.1.1 Page 3-37:

PG&E will tap the ~~6-inch gas service line serving the existing CalPeak Panoche Peaker facility approximately 25 feet upstream of the existing meter set~~ ~~main~~ gas transmission ~~trunk~~line running adjacent to the project site, and install 50 feet of ~~6~~4-inch steel pipeline to a new 6-inch turbine meter set ~~adjacent to CalPeak Power's existing meter set~~. See revised Figure 3.4-1, Preliminary Plan for the location of the meter sets. From the newly installed meter set, approximately 600 feet of gas line would be constructed along the ~~western~~ southern perimeter of the project site.

Section 3.11.7.1 Page 3-57:

The Midway site will be fueled by natural gas supplied from PG&E's ~~trunk~~ Backbone Transmission line ~~system~~ immediately to the ~~north~~ northeast of the ~~property~~ Project site. The gas interconnection would require approximately ~~650~~ 600 feet of new line at the Midway site in order to tap into the existing PG&E system. The proposed pipeline would have sufficient capacity to supply each FT8-3 SwiftPac CTG unit with approximately 625MMBtu/hr at a pressure of 500-600 psig.

SECTION 3 ENVIRONMENTAL ANALYSIS OF THE PROJECT CHANGES

The proposed incremental change to the Midway Project contains all the information that is required pursuant to the CEC's Siting Regulations (CCR Title 20, Section 1769, Post Certification Amendments and Changes). Per Section 1769(a)(1)(E) the following sections provide an environmental analysis for each of the 16 different discipline areas as indicated below.

The environmental disciplines are addressed in the same order as the Midway 2006 AFC (06-AFC-10), as follows:

3.1 ENVIRONMENTAL BASELINE

The discussion on the environmental baseline in the Midway 2006 AFC is adequate to describe the baseline conditions for purposes of this Amendment. The Midway Project is still contained within the 128-acre parcel of land identified in the Midway 2006 AFC; however, the proposed incremental change to the Midway Project would add approximately 0.04-acre (25 X 75-foot fenced meter run) to the 5.6-acre Project footprint at the southeastern corner of the Project site. The revised route for the gas pipeline on the Project site will change to reflect the new location of the PG&E supply and meters; however it will remain completely on the Midway property. The meter set and pressure regulators will be relocated to the 25 X 75-foot meter run within the PG&E Easement. See Section 2.0, Description of Project Amendment, for further description of the proposed incremental change to the Midway Project. No other changes to the Project baseline provided in the Midway 2006 AFC are required related to this Amendment.

3.2 AIR QUALITY

The proposed incremental change to the Midway Project, as described in Section 2.0, Description of Project Amendment, would not involve substantial changes to the findings and conclusions in Section 5.2, Air Quality, of the Midway 2006 AFC (06-AFC-10).

The proposed change to the Midway Project discussed in Section 2.0 includes a new location for the Project gas line, meter set and pressure regulators. The original on-site gas pipeline was approximately 540-feet in length and the revised pipeline length is 600-feet, which would create a negligible change in the equipment emissions and dust generated for the construction of this gas pipeline. Construction of the meter set and pressure regulators will be the same as described in the Midway 2006 AFC and no changes in air emissions will result from the relocation to the offsite location. Elimination of the installation of 900 feet of gas pipe along West Panoche road and the corresponding dust is a substantial air quality benefit.

This proposed change will not effect the operational emissions of any criteria pollutant or toxic air contaminant or the flow rate of turbine exhaust to the atmosphere. Given that the gas turbines are the only stationary sources of toxic air contaminants associated with Project operations, and the fact that the nature of the proposed incremental changes does not affect impacts from these sources, it was concluded that the health risk assessment modeling presented in the Midway 2006 AFC does not need to be repeated.

3.3 GEOLOGIC HAZARDS AND RESOURCES

The proposed incremental change to the Midway Project, as described in Section 2.0, Description of Project Amendment, would not involve substantial changes to the findings and conclusions in Section 5.3, Geological Hazards and Resources, of the Midway 2006 AFC (06-AFC-10).

The proposed incremental change to the Midway Project discussed in Section 2.0 includes a relocation of the Project meter set and pressure regulators to be located just outside the southeastern border of the Project site. The geological make up of the area identified for the meter run is similar to that of the Project site as discussed in the Midway 2006 AFC. In addition, the revised route for the gas pipeline will remain completely on the Midway property. Therefore, the proposed incremental change to the Midway Project does not introduce any new geologic hazards nor threaten any geological resources.

3.4 AGRICULTURE AND SOILS

The proposed incremental change to the Midway Project, as described in Section 2.0, Description of Project Amendment, would not involve substantial changes to the findings and conclusions in Section 5.4, Agriculture and Soils, of the Midway 2006 AFC (06-AFC-10).

The proposed incremental change to the Midway Project would add approximately 0.04-acre (25 X 75-foot fenced meter run) to the 5.6-acre Project footprint at the southeastern corner of the Project site within an existing PG&E easement. While the land within this easement is currently under Williamson Act contract, it is currently a dirt lot that is not actively farmed. In addition, the meter run is proposed in a triangular area surrounded by the Midway site leasehold, the Wellhead Power plant and the PG&E gas line ROW; therefore, agricultural activities within this area would be difficult if not impossible to conduct. Fresno County zoning officials and the CEC Staff concur, the type of piping and connection proposed as part of this Amendment, are allowed by the Williamson Act and will not likely require Williamson Act Contract cancellation for the area. The remainder of the Project site has been successfully removed from Williamson Act contract. Therefore, the proposed incremental change is in conformance with the Williamson Act.

The soil in the area identified for the meter run is similar to that of the Project site as discussed in the Midway 2006 AFC. Therefore, soil impacts remain unchanged from those discussed in the Midway 2006 AFC. The proposed incremental change to the Midway Project will not result in any additional environmental consequences with respect to agriculture and soils.

3.5 WATER RESOURCES

The proposed incremental change to the Midway Project, as described in Section 2.0, Description of Project Amendment, would not involve substantial changes to the findings and conclusions in Section 5.5, Water Resources, of the Midway 2006 AFC (06-AFC-10), the October 2007 Alternative Water Supply Analysis, or the conditions in the January 2008 CEC Final Commission Decision (FCD).

The proposed incremental change includes a revised route for the Project gas line, and a new location for Project meter set, and pressure regulators and does not include changes to water supply, water demand for

construction or operation activities, or site drainage. No impacts related to water usage rates or amounts or wastewater disposal would result from the approval of this Amendment.

3.6 BIOLOGICAL RESOURCES

The proposed incremental change to the Midway Project, as described in Section 2.0, Description of Project Amendment, would not involve substantial changes to the findings and conclusions in Section 5.6, Biological Resources, of the Midway 2006 AFC (06-AFC-10).

The proposed incremental change to the Midway Project would add approximately 0.04-acre (25 X 75-foot fenced meter run) to the 5.6-acre Project footprint at the southeastern corner of the Project site. As this area was included in the surveys conducted for the Midway 2006 AFC (06-AFC-10) no additional biological surveys were required. Additionally, a biological resources monitor will be on-site during construction to ensure Project conformance with the biological resources Conditions of Certification.

No sensitive or legally protected biological resources or habitats that would support such resources are present or expected to be present in this 0.04-acre area. The proposed incremental change to the Midway Project will not affect the diversity of wildlife, plant species, or the movement of fish or any wildlife species, and does not conflict with an applicable habitat conservation plan.

No additional noise impacts to wildlife are anticipated due to the lack of sensitive biological resources adjacent to the Project site. No foraging or nesting habitat for raptors or other birds is present on or adjacent to the Project site. The developed nature of the surrounding area minimizes the potential for bird collisions with increased structure height associated with the proposed incremental change to the Midway Project.

No wetlands or jurisdictional waters are present; therefore, no impacts to wetlands or jurisdictional waters are anticipated as a result of the proposed incremental change to the Midway Project. No new significant impacts to biological resources would result from the proposed incremental change to the Midway Project.

3.7 CULTURAL RESOURCES

The proposed incremental change to the Midway Project, as described in Section 2.0, Description of Project Amendment, would not involve substantial changes to the findings and conclusions in Section 5.7, Cultural Resources, of the Midway 2006 AFC (06-AFC-10).

The proposed incremental change to the Midway Project would add approximately 0.04-acre (25 X 75-foot fenced meter run) to the 5.6-acre Project footprint at the southeastern corner of the Project site. As this area was included in the surveys conducted for the Midway 2006 AFC (06-AFC-10) no additional cultural resource surveys were required. Additionally, as required per CEC Conditions of Certification, a cultural resources monitor will be on-site during ground disturbance activities to monitor excavation and, in the event of an unanticipated discovery, provide for the handling and curation of any recovered cultural resources.

As identified in the Midway 2006 AFC, there are no previously recorded cultural resources located within or adjacent to the Project site. Therefore, there are no anticipated direct or indirect impacts to archaeological resources. In addition, no built resources eligible for federal or state registers would be adversely impacted. The structures located near the Midway site are ineligible for state and federal registers. Therefore, there are no anticipated direct or indirect impacts to historic resources.

The proposed incremental change to the Midway Project would not create any new impacts to cultural resources. Therefore the discussion of environmental impacts to cultural resources in the Midway 2006 AFC is sufficient for the purposes of this Amendment.

3.8 PALEONTOLOGICAL RESOURCES

The proposed incremental change to the Midway Project, as described in Section 2.0, Description of Project Amendment, would not involve substantial changes to the findings and conclusions in Section 5.8, Paleontological Resources, of the Midway 2006 AFC (06-AFC-10).

The proposed incremental change to the Midway Project would add approximately 0.04-acre (25 X 75-foot fenced meter run) to the 5.6-acre Project footprint at the southeastern corner of the Project site. As this area was included in the surveys conducted for the Midway 2006 AFC (06-AFC-10) no additional paleontological resource surveys were required. Additionally, a paleontological resources monitor will be on-site during construction to ensure Project conformance with the paleontological resources Conditions of Certification.

No impacts on paleontological resources are expected to occur from the continuing operation of the Project or any of its related facilities. Therefore, the proposed incremental change to the Midway Project would not create any new impacts to paleontological resources. The discussion of environmental impacts to paleontological resources in the Midway 2006 AFC is sufficient for the purposes of this Amendment.

3.9 LAND USE

The proposed incremental change to the Midway Project, as described in Section 2.0, Description of Project Amendment, would not involve substantial changes to the findings and conclusions in Section 5.9, Land Use, of the Midway 2006 AFC (06-AFC-10).

The proposed incremental change to the Midway Project would not result in a significant change to the land use findings of the Midway 2006 AFC. The proposed incremental change would not physically divide an established community; conflict with applicable land uses plans, policies, or regulations; or conflict with an applicable habitat conservation plan. The slight expansion of the Project site boundaries is negligible and, therefore, there no new or increase land use impacts have been identified.

3.10 SOCIOECONOMICS

The proposed incremental change to the Midway Project, as described in Section 2.0, Description of Project Amendment, would not involve substantial changes to the findings and conclusions in Section 5.10, Socioeconomics, of the Midway 2006 AFC (06-AFC-10).

As installation of a gas line, meter set and pressure regulators for the Project were identified in the Midway 2006 AFC, a change in the location of these facilities will not require additional construction workers. Therefore, no significant changes or impacts are expected with the proposed incremental change to the Midway Project.

3.11 TRAFFIC AND TRANSPORTATION

The proposed incremental change to the Midway Project, as described in Section 2.0, Description of Project Amendment, would not involve any changes to the findings and conclusions in Section 5.11, Traffic and Transportation, of the Midway 2006 AFC (06-AFC-10). As installation of a gas line, meter set and pressure regulators for the Project were identified in the Midway 2006 AFC, a change in the location of these facilities will not require or create any new or added trips associated with the Project. Therefore, no increased traffic impacts would result from approval of the proposed incremental change to the Midway Project.

3.12 NOISE

The proposed incremental change to the Midway Project, as described in Section 2.0, Description of Project Amendment, would not involve any changes to the findings and conclusions in Section 5.12, Noise, of the Midway 2006 AFC (06-AFC-10). The Project amendment includes a revised gas line route, and re-location of the meter set and pressure regulators to an area directly adjacent to the Project site within a PG&E easement.

The proposed incremental change to the Midway Project does not involve any changes to the specification of the noise generating equipment. In addition, the slight relocation of noise generating equipment on-site, in terms of distances from the equipment to nearby receivers, were not significant enough to cause a change in the noise impact levels as described in Section 5.12, Noise, of the Midway 2006 AFC. Therefore, no increased noise impacts would result from approval of the proposed incremental change to the Midway Project.

3.13 VISUAL RESOURCES

The proposed incremental change to the Midway Project, as described in Section 2.0, Description of Project Amendment, would not involve substantial changes to the findings and conclusions in Section 5.13, Visual Resources, of the Midway 2006 AFC (06-AFC-10).

The proposed incremental change to the Midway Project would add approximately 0.04-acre (25 X 75-foot fenced meter run) to the 5.6-acre Project footprint at the southeastern corner of the Project site. The proposed site plan changes would have a negligible effect on visual resources as there is no change in structure heights, and the slight expansion of the Project site is onto an area of land that is currently surrounded by the Midway site leasehold, the Wellhead Power plant and the PG&E gas line ROW. Given that the changes are negligible, the visual resource KOP simulations presented in the Midway 2006 AFC do not need to be revised. The proposed incremental change to the Midway Project would not create increased visual resource impacts. Therefore, the assessment of environmental consequences presented in

the Midway 2006 AFC is adequate to represent Project impacts to visual resources with the proposed modifications.

3.14 HAZARDOUS MATERIALS

The proposed incremental change to the Midway Project, as described in Section 2.0, Description of Project Amendment, would not involve changes to the findings and conclusions in Section 5.15, Hazardous Materials, of the Midway 2006 AFC (06-AFC-10).

The installation of a gas line, meter set and pressure regulators were identified in the Midway 2006 AFC. A new route for the gas line, and new location of the meter set and pressure regulators will not increase hazardous waste use, transport or increase potential for accidental hazardous waste release. No increased hazardous materials impacts would result from the approval of the proposed incremental change.

3.15 PUBLIC HEALTH AND SAFETY

The proposed incremental change to the Midway Project, as described in Section 2.0, Description of Project Amendment, would not involve substantial changes to the findings and conclusions in Section 5.16, Public Health and Safety, of the Midway 2006 AFC (06-AFC-10).

The installation of a gas line, meter set and pressure regulators were identified in the Midway 2006 AFC. A new route for the gas line, and new location of the meter set and pressure regulators will not change the operational emissions of any criteria pollutant or toxic air contaminant, nor the flow rate of turbine exhaust to the atmosphere. Given that the gas turbines are the only stationary sources of toxic air contaminants associated with the operational Project, it was concluded that the health risk assessment modeling presented in the Midway 2006 AFC does not need to be repeated. No increased impacts to public health and safety would result from the approval of the proposed incremental change.

3.16 WORKER SAFETY

The proposed incremental change to the Midway Project, as described in Section 2.0, Description of Project Amendment, would not involve substantial changes to the findings and conclusions in Section 5.17, Worker Safety, of the Midway 2006 AFC (06-AFC-10).

Construction, operation, and maintenance activities for the Project may expose workers to the hazards identified in Table 5.17-1 in Section 5.17, Worker Safety, of the Midway 2006 AFC. The proposed incremental change to the Midway Project does not involve changes to these hazards. Section 5.17, Worker Safety, of the Midway 2006 AFC encompasses a comprehensive health, safety and fire prevention program and an accident/injury prevention program intended to ensure healthful and safe operations at the Midway Project. The proposed incremental change to the Midway Project would not involve any substantial changes to the findings and conclusions of that section.

3.17 MITIGATION MEASURES

The proposed incremental change to the Midway Project would not substantially change findings and conclusions discussed in the Midway 2006 AFC. No increased impacts to would result from the approval

of this Amendment. Therefore, no additional mitigation measures are recommended; consistent with the Commission Decision for the Midway 2006 AFC.

3.18 CUMULATIVE IMPACTS

Construction and operation of the Project, as amended, will not induce any significant cumulative impacts.

3.19 COMPLIANCE WITH LORS

Construction and operation of the Project, as amended, will conform with all applicable LORS previously identified in the Midway 2006 AFC and the April 2008 Midway Amendment No. 1.

3.20 SUMMARY OF CONCLUSIONS

The proposed incremental change to the Midway Project would not involve substantial changes to the findings and conclusions of the Midway 2006 AFC. None of the environmental disciplines would be significantly impacted by the proposed incremental change to the Midway Project.

This Amendment does not require changes to the conditions identified in the Starwood Power-Midway, LLC Peak Project Conditions of Certification (CEC 2008).

SECTION 4 POTENTIAL EFFECTS ON THE PUBLIC

This section addresses potential effects on the public from the proposed incremental change to the Midway Project, pursuant to the CEC's Siting Regulations (Title 1769[a][1][H]). Fresno County is a rapidly developing area and shortages of electricity can impose the risk of serious adverse impacts on the public.

The proposed incremental change to the Midway Project will benefit the public by allowing the Project to provide power during periods of high demand to meet increasing electricity requirements associated with the growth of this region. The proposed incremental change to the Midway Project would not situate the Project site closer to nearby property owners. The entire Project site was previously examined in the Midway 2006 AFC. No increased impacts on the public relating to any of the environmental disciplines will be caused by the proposed incremental change to the Midway Project.

SECTION 5 LIST OF PROPERTY OWNERS

Consistent with the CEC Siting Regulations Section 1769(a)(1)(H), this section lists the property owners affected by the proposed incremental change to the Midway Project. The proposed incremental change to the Midway Project does not change the list of affected property owners previously submitted in the Midway 2006 AFC (06-AFC-10). The list of property owners is presented below.

Ownership Information	Inst #	Date Rec.
02706053S		
Narr - SUR RTS 17.88 ACS IN N1/2 SEC 5 T15R13		
Loc - 043405 PANOCHE RD FIREBAUGH		
VAQUERO FARMS INC	112227	19831201
2800 W MARCH LM #330 STOCKTON CA 95219		
02706054S		
Narr - SUR RTS 163.53 AC IN N1/2 SEC 5 T15R13		
Site -		
PRUETT GREGORY R ASOPERATION TRUSTEE	179790	19991217
HYCKE CINDY PREUTT DISPOSITION TRUSTEE	179790	19991217
PRUETT GREGORY R DISPOSITION TRUSTEE -	179790	19991217
OF C P HUCKE IRREVOC TR DTD 2-18-97	179790	19991217
(CR 3179790 12-17-99)	064309	19970519
2800 W MARCH LM #330 STOCKTON CA 95219		
02706056S		
Narr - SUR RTS 120.32 AC IN SECS 5 & 6 T15R13		
Loc - 043946 W PANOCHE RD FIREBAUGH		
FARMERS INERNATIONAL INC	016911	20040123
1260 MUIR AVE CHICO CA 95973		
02706061SU		
02706077S		
Narr - SUR RT 64.24 AC IN NE1/4 SEC 5 T15R13		
Site -		
HANSEN ROBERT TRUSTEE -	118104	19900928
HANSEN ROBERT TRUSTEE -	000000	19900928
OF SMARLA BAKER U/T/D 6-13-78	118104	19900928
% PANOCHE FARMS PO BOX 867		
FIREBAUGH CA 93622		

Ownership Information	Inst #	Date Rec.
02706078S		
Narr - SUR RTS 128.49 AC IN W1/2 SEC 5 T15R13		
Loc - 043649 W PANOCHE RD FIREBAUGH		
PAO INVESTMENTS LLC	061258	19060324
45499 W PANOCHE RD FIREBAUGH CA 93622		
02706079S		
Narr - SUR RT 160 AC SE1/4 SEC 5 T15R13		
Site -		
BAKER BARRY S TRUSTEE	159044	20001228
MC DOUGAL JUDITH M TRUSTEE -	159044	20001228
OF J R BAKER 1/U/D DTD 11-1-00	159044	20001228
PO BOX 867 FIREBAUGH CA 93622		

SECTION 6 POTENTIAL EFFECTS ON PROPERTY OWNERS

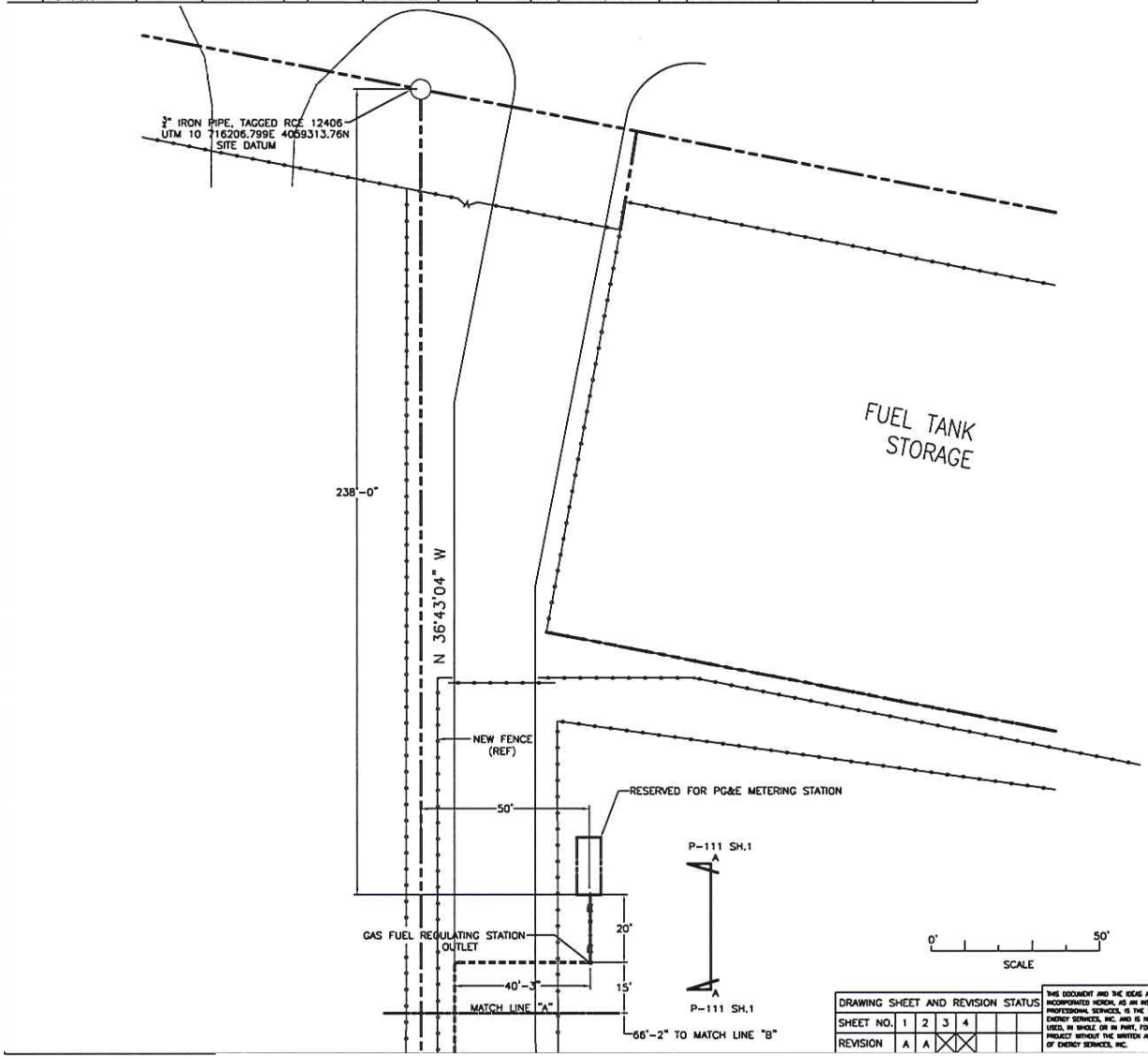
This section addresses potential effects of the proposed incremental change to the Midway Project on nearby property owners, the public, and parties in the application proceeding, per CEC Siting Regulations ((Title 1769[a][1][H]).

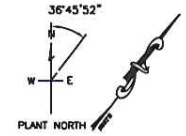
The proposed incremental change to the Midway Project would not situate the Project site substantially closer to property owners. The proposed incremental change to the Midway Project would add approximately 0.04-acre to the Project footprint at the southeastern corner of the Project site. The Midway Project is contained within a 128-acre parcel of land. This entire parcel was previously examined in the Midway 2006 AFC (06-AFC-10). The proposed incremental change to the Midway Project would not involve substantial changes; therefore no new significant impacts would result from the proposed incremental change.

SPECIFICATIONS (UNLESS NOTED OTHERWISE)

SPEC. No.	DESIGN CONDITIONS	PIPE SIZE	PIPE MATL.	PIPE SCH.	FITTING SIZE	FITTING MAT'L	FITTING WT/SCH	FLANGES SIZE	FLANGES CLASS	FLANGES MATL.	FLANGES TYPE	BOLTING	GASKET	REMARKS
18	GAS FUEL PRESS. 1200 PSIG TEMP. 200°F	2" ≤	ASTM A-106 GR.B CARBON STEEL	80	2" ≤	ASTM A-105	ANSI 3000	2" ≤	ANSI 600	ASTM A-105 OR A-181, GR.II	SWRF	ASTM A-193 GR. B7 AND ASTM A-194 GR. 2H	1/8" SPIRAL WOUND FLEXITALLIC STYLE CG TYPE 304 S.S. OR EQUAL	
		2 1/2" ≥	ASTM A-106 GR.B CARBON STEEL	80	2 1/2" ≥	ASTM A-234 WPB SEAMLESS	80	2 1/2" ≥	ANSI 600	ASTM A-105 OR A-181, GR.II	WNRF			

REV	DATE	DESCRIPTION	BY	APP
A	6JUN08	INITIAL ISSUE	RAR	JJH





NOTES

1. ALL DIMENSIONS AND PIPE SIZES ARE IN FEET AND INCHES UNLESS OTHERWISE NOTED.
2. CONTRACTOR TO MAINTAIN A MINIMUM OF 3' COVER ON UNDERGROUND PIPING.
3. REFER TO CIVIL DRAWINGS FOR EXISTING AND FINAL GRADE.
4. ALL WORK SHALL BE IN ACCORDANCE WITH ESI CONSTRUCTION SPECIFICATION MW-201-010.
5. GAS FUEL PIPING SHALL BE INSTALLED, TESTED, CLEANED, LABELED AND TAGGED IN ACCORDANCE WITH CONSTRUCTION SPECIFICATION SECTION 40 05 13, AND ASME/ANSI B31.1, POWER PIPING CODE.
6. PIPING MATERIAL SHALL BE AS DEFINED IN CONSTRUCTION SPECIFICATION SECTION 40 05 13, EXHIBIT 2.
7. REFER TO APPLICABLE P&ID AND BILL OF MATERIAL FOR ADDITIONAL SYSTEM REQUIREMENTS.
8. (XX) REFERS TO ITEM NUMBERS ON MECHANICAL BILL OF MATERIAL.
9. UNDERGROUND PIPING TO BE PROVIDED WITH EXTERNAL CORROSION PROTECTION IN ACCORDANCE WITH CONSTRUCTION SPECIFICATION, SECTION 40 46 00.
10. ALL PIPING CONNECTIONS TO UNDERGROUND PIPING SHALL BE ISOLATED WITH INSULATION KITS.
11. GAS FUEL VENT LINES SHALL BE ROUTED TO PERSONNEL SAFE AREAS, AWAY FROM SOURCES OF IGNITION.
12. GAS FUEL SEPARATOR SKID COMPONENTS SHALL NOT BE PRESSURE TESTED WITH FIELD INSTALLED PIPING. GAS FUEL SEPARATOR DESIGN PRESSURE IS LESS THAN THE DESIGN PRESSURE OF THE FIELD PIPING.
13. ALL PIPING JOINTS SHALL BE LEFT EXPOSED TO ALLOW INSPECTION DURING PRESSURE TESTING.
14. CONTRACTOR SHALL PROVIDE PROVISIONS IN THEIR PIPING FABRICATIONS FOR FIELD FIT-UP TO EQUIPMENT INTERFACE CONNECTIONS. THIS IS REQUIRED TO ACCOUNT FOR DIMENSIONAL VARIANCES IN ACTUAL PIPE AND EQUIPMENT INSTALLATION LOCATIONS, AND FOR EQUIPMENT FABRICATION TOLERANCES.

REFERENCE DRAWINGS

MW-L-100	SITE PLAN
MW-C-101	SITE GRADING PLAN
MW-MF-110	P&ID, GAS FUEL SYSTEM
MW-MBM-110	MECHANICAL BILL OF MATERIAL, GAS FUEL SYSTEM
MW-P-111	PIPING, GAS FUEL SYSTEM, SECTIONS & DETAILS
0717-138-M000D	ASSEMBLY, FIELD PIPING, UNIT A
0717-138-M001D	ASSEMBLY, FIELD PIPING, UNIT B

DRAWING SHEET AND REVISION STATUS						
SHEET NO.	1	2	3	4		
REVISION	A	A	X	X		

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STARWOOD ENERGY GROUP

STARWOOD POWER-MIDWAY, LLC
PEAKING PROJECT

ENERGY SERVICES, INC.

SCALE	1/16"=1'
DATE	6MAY08
DRN	RAR
CHK	JJH
APP	LGP

PIPING
GAS FUEL SYSTEM

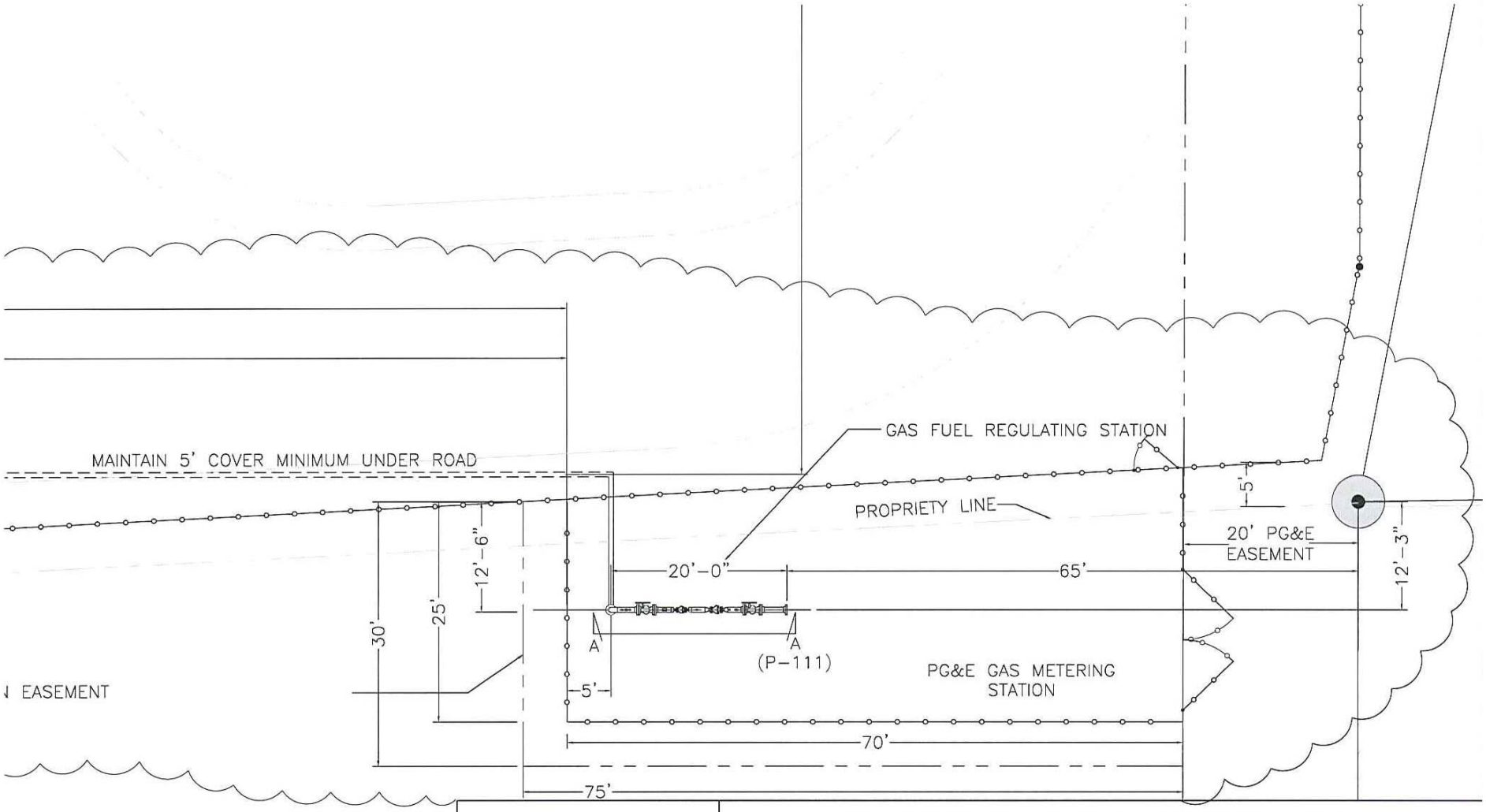
NO MW-P-110 SH 1/2 REV A

APPROVED GAS METER AND PIPELINE LOCATION
STARWOOD POWER PROJECT AMENDMENT NO. 2

URS

NO SCALE

CREATED BY: AG	DATE: 10.23.08	FIG. NO: 1
PM:AL	PROJ. #: 27656131.00700	



STARWOOD POWER-MIDWAY, LLC
PEAKING PROJECT

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STARWOOD

ENERGY SERVICES INC.
A CONNECTICUT CORP.

SCALE	3/32"=1'
DATE	6MAY08
DRN	RAR

PIPING
GAS FUEL SYSTEM

PROPOSED GAS METER AND PIPELINE LOCATION
STARWOOD POWER PROJECT AMENDMENT NO. 2

URS

NO SCALE	CREATED BY: AG	DATE: 10.23.08	FIG. NO: 2
	PM:AL	PROJ. #: 27656131.00700	

AERIAL OF PROPOSED GAS METER AND PIPELINE LOCATION
STARWOOD POWER PROJECT AMENDMENT NO. 2

URS	NO SCALE	CREATED BY: AG	DATE: 10.23.08	FIG. NO: 3
		PM:AL	PROJ. #: 27656131.00700	