June 19, 2012

California Energy Commission
DOCKETED
88-AFC-1C
TN # 65901
JUNE 22 2012

Dale Rundquist
Compliance Project Manager
California Energy Commission
Siting, Transmission, & Environmental Protection (STEP) Division
1516 Ninth Street, MS-2000
Sacramento, CA 95814-5512

Dear Mr. Rundquist:

A request for an amendment to the Conditions of Certification for SEGS VIII Harper Lake (88-AFC-1) and SEGS IX Harper Lake (89-AFC-1) located at 43880 Harper Lake Road, Hinkley, CA 92347 follows.

1. **Conditions of Certification affected by the proposed change:** The SEGS VIII Harper Lake and SEGS IX Harper Lake facilities operate under Conditions of Certification from the California Energy Commission (CEC). This submittal is intended to support the CEC's review and approval of the proposed modification and CEC's determination of whether any changes to our Conditions of Certification are necessary.
2. **Description of the proposed modification:** NextEra Energy is proposing to construct a foundation and containment structure for storage of a spare main power transformer to be located at the north end of the facility between the two solar fields (Attachment 1). The spare transformer will be purchased this year and will be stored at the facility in the proposed containment structure. Transformers of this size and configuration are special order and require a considerable lead time. In order to improve the plants reliability we are purchasing a spare transformer to be ready and available on site in the event of failure of either one of the two existing main power transformers. This would allow us to minimize any plant downtime in the event of such a failure. The foundation and containment structure will be approximately 25' by 25' in size and will include lightning protection as well as connection to the existing grounding grid. The foundation and containment structure would be constructed in compliance with existing laws, ordinances, regulations and statutes.
3. **Proposed modifications based on information not available prior to certification**: The modification is based on information that was not available at the time of certification.
4. **Environmental impact:**
   a) **Summary:** The proposed project will not result in any significant adverse environmental impacts.
   b) **Air quality:** minimal short-term air quality impacts are possible during construction of the foundations, power and control electrical wiring. Excavation will be necessary to route electrical wiring. The construction of the foundations and electrical will take approximately one week to complete. Minor dust emissions and vehicle exhaust are possible. NextEra Energy will mitigate dust emissions using standard dust control practices, including watering. Further, our practice is to ensure that minimal vehicle idling occurs, thereby minimizing vehicle exhaust. Furthermore, all equipment used on site is required to be in proper working order, including properly tuned engines. We believe these measures, coupled with the short-term nature of the construction, will result in air emissions that are not significant.
   c) **Noise:** No significant noise impacts will result from the proposed project. Based on our knowledge of practices for construction of this type, no activities associated with the project have the potential to generate significant noise levels at or beyond the facility boundary.
   d) **Cultural resources:** No adverse impacts on cultural resources (archeological or paleontological) will result from the proposed project. During CEC review of the original project, a complete paleontological survey was conducted on the overall project site. The supporting documentation is available in the project files on site if necessary. No cultural resources were identified within the plant boundary and the proposed project is located within the plant boundary. Furthermore, excavation, grading and other construction activities in the vicinity

of the currently proposed project were carried out during the original construction of the project. Therefore, the area has already been disturbed, and no cultural resources were discovered during construction of the existing plant.

e) **Biological resources:** No adverse impacts on biological resources will result from the proposed project. During CEC review of the original project a complete biological survey was conducted on the overall project. Desert tortoises are potentially present within the overall project area, but the plant boundaries are fenced to eliminate the possibility of tortoises straying into the plant. As part of our normal contractor orientation program, NextEra Energy awareness training and information on the possible presence and the proper response to a sighting, per our existing Conditions of Certification.

f) **Visual impacts:** No significant adverse visual impacts will result from the proposed project. The construction is in a location that is shielded visually by other existing structures and equipment at the site, minimizing incremental visual impacts and rendering the proposed project insignificant with regard to the existing project profile.

g) **Hazardous materials:** The proposed project will not result in any potential adverse environmental impacts associated with hazardous materials use. The transformer will contain oil but will not be energized except for low voltage for periodic cycling of cooling fans. The containment will be designed to comply with all spill containment requirements, will be inspected daily and will have provisions for removal of any rainwater accumulation.

h) **Water Resources:** The proposed project will not result in any significant adverse impact to water resources.

5. **Labor:** The daily local work force will average 10 for the construction of the foundation and containment for a period of approximately one week. Additionally, there will be a crew of approximately 10 people to unload and set the transformer on the foundation over a period of two days.
6. **Transportation**: For the foundation and containment structure, about 4 trucks will be used to haul concrete and rebar for foundations across a period of one week and about 3 trucks and one large capacity crane will set the transformer on the foundation during a period of two days. This will have little adverse impact to traffic.
7. **Environmental impact mitigation:** No mitigation will be required since there will be no additional environmental impact.
8. **Affect on the public:** This minor amendment will not affect the public since this change does not change the operation of the facility.
9. **Consistent with the overall intent of the Decision:** The proposed modification is a minor amendment to the original Certification of Conditions and is consistent with the overall intent of the Decision.
10. **Approval date and reason:** A request is to approve this minor amendment respectfully as expeditiously as is possible to allow for final containment design work and construction to be completed prior to the expected transformer delivery in the fourth quarter 2012.. All applicable permits will be obtained for this project.

Should you have any questions or require additional information please contact me at (760) 762-5562 extension 395, or Glen King at (760) 762-3100 extension 231.

Sincerely,

Robert Fimbres
Plant General Manager
Luz Solar Partners Ltd.., VIII & IX

Attachment

Attachment 1
Proposed Location

Attachment 1

General Site Overview

Detail Views

Proposed Location

Ground Level View