

DOCKETED

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Comment Received From: Jeffery D. Harris

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Applicant's PowerPoint presentation for the upcoming December 10, 2015 workshop.

Additional submitted attachment is included below.



**CEC Staff Workshop
Petition for Modification to Drought-Proof
the High Desert Power Project**

December 10, 2015

Why the Commission Must Act Now to Drought Proof HDPP

- ▶ High capacity factor
- ▶ Grid reliability
- ▶ Flexible, dynamic baseload generation to integrate renewables
- ▶ Significant local economic impact
 - Jobs and tax revenue
- ▶ Local, state and federal support

History of HDPP's Voluntary Transition from Use of Surface Water to Recycled Water

- ▶ Energy Commission's original certification expressly prohibited HDPP from using Recycled Water
- ▶ HDPP proactively petitioned the Energy Commission requesting to use Recycled Water
- ▶ HDPP proactively invested in significant and costly capital projects to maximize Recycled Water use

Current HDPP Water Supplies

- ▶ HDPP currently has access to four different water supplies to operate the plant
 - Recycled Water
 - SWP Water
 - Banked SWP Water
 - MRB Adjudicated Water
- ▶ For reliable operations, HDPP can't depend solely on a single water supply source

Maximizing Recycled Water Use

- ▶ Priority is to maximize Recycled Water use
- ▶ Objective criteria used to blend water supplies to maximize Recycled Water use
 - Monitor CT Blowdown Rate to objectively determine blending requirements to maximize Recycled Water use
 - Monitor chloride concentration to objectively determine blending requirements to maximize Recycled Water use

Water Loading Sequence

- ▶ Water blended consistent with SOIL&WATER-1 using Loading Sequence

Order of Use	Type of Water	Cost
First	Recycled Water	Least
Second	SWP Water	↓
Third	Banked SWP Water	
Last	MRB Adjudicated Water	Highest

Compliant with all Laws, Ordinances, Regulations & Standards

- ▶ No significant environmental effects
- ▶ Consistent and compliant with all LORS
- ▶ Compliant with California water law and policy
- ▶ Requires no new infrastructure

Mojave River Basin is Protected

- ▶ Judgment mitigates all MRB Adjudicated Water use to a less than significant level
- ▶ Watermaster declares Alto Subarea yield is sustainable
- ▶ No groundwater overdraft in Alto Subarea

Net Benefit to Local Water Supplies

- ▶ HDPP's 2:1 replacement for all MRB Adjudicated Water use results in net benefit

How to Drought-Proof HDPP & Maximize Recycled Water Use (Revise Condition SOIL&WATER-1)

- ▶ Approve Loading Sequence to Maximize Recycled Water Use
 - Recycled Water is primary source of water
 - SWP Water, Banked SWP Water and MRB Adjudicated Water are backup supplies for blending

How to Drought-Proof HDPP & Maximize Recycled Water Use (Revise Condition SOIL&WATER-1)

- ▶ Use Objective Criteria for Blending Supplies
 - Implement CT Blowdown Formula
 - Maintain chloride concentration at or below 980 mg/L
 - Threshold Chloride Concentration

How to Drought-Proof HDPP & Maximize Recycled Water Use (Revise Condition SOIL&WATER-1)

- ▶ Approve MRB Adjudicated Water Use for Blending and Backup
 - 3,090 acre-feet per year, measured on a 5-year rolling average

THANK YOU