

## DOCKETED

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<b>Project Title:</b>	Puente Power Project
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<b>Description:</b>	N/A
<b>Filer:</b>	Paul Kihm
<b>Organization:</b>	Latham & Watkins LLP/Michael Carroll
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November 3, 2015

Mr. Robert Oglesby  
Executive Director  
California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814

Re: Puente Power Project (15-AFC-01)  
Withdrawal of Prior Responses to CEC Staff Data Request No. 2

Dear Mr. Oglesby:

I am responding to the City of Oxnard's objection to Applicant's request to withdraw the August 17, 2015 and September 25, 2015 responses to CEC Staff Data Request No 2. As stated in Applicant's request, the reason for the requested withdrawal is that Applicant is substantially revising the air quality modeling analysis provided in response to Staff Data Request No. 2 and intends to provide the revised modeling analysis to both the CEC and the City. The initial modeling will have no probative value in evaluating the project, and having two sets of live emission spreadsheets in the record has the potential to lead to confusion on the part of those reviewing the project, including the public.

The impetus for revising the modeling analysis is new information recently obtained from GE related to the emission performance of the turbine. As indicated in the attached letter, GE has revised its particulate matter emission guarantee down from 10.6 pounds per hour to 10.1 pounds per hour. In addition, GE has provided new gas turbine performance runs, which will impact emissions of all pollutants, and new exhaust parameters, which will impact all air quality modeling performed for the project.

When CEC and local air district staff learned of the plan to revise the modeling based on the new GE data, they asked Applicant to also incorporate changes to the modeling procedures adopted since the initial modeling was conducted, which include:

- Using AERMOD version 15181, as opposed to the previously used AERMOD version 14134.
- Using new metrological data processed with AERMET version 15181, as opposed

to the previous modeling which used AERMET version 14134.

- Using a five year metrological database covering 2010 to 2014, versus the previous modeling which used 2009 to 2013 metrological database.
- Using background ambient hourly ozone/NO<sub>2</sub> covering 2010 to 2014, versus the previous modeling which used 2009 to 2013 ozone/NO<sub>2</sub> background ambient data.
- Using the AERSCREEN fumigation model, versus the previous fumigation modeling which used the SCREEN3 model.

With updated emissions information from GE and updated modeling procedures, the revised modeling will be significantly different from the initial modeling, and will more accurately represent anticipated project operations. Contrary to the assertions of the City, the initial modeling will not be necessary to determine what changes have been made, or to evaluate the adequacy of the revised modeling. The revised modeling will clearly indicate the changes made relative to the initial modeling. The revised modeling will be a complete assessment of project emissions the adequacy of which can be evaluated without reference to the initial modeling. Because of the significant differences in model inputs and procedures, a comparison of the initial modeling to the revised modeling would be an “apples to oranges” comparison which would serve no useful purpose.

Thus, there is no probative value to maintaining the existing modeling as part of the CEC record or to providing it to the City. To the contrary, having two sets of modeling analyses in the record is more likely to cause confusion than it is to advance meaningful review of the project. Under these circumstances, withdrawal of the prior submissions is the appropriate course of action.

Thank you for your attention to this matter. Please do not hesitate to contact me if you have any questions.

Very truly yours,

*/s/ Michael Carroll*

Michael Carroll  
of LATHAM & WATKINS LLP

Attachment

cc: Jon Hilliard  
Jared Babula  
Gerry Bemis  
Jacquelyn Record

**ATTACHMENT**



October 28, 2015

To: NRG Puente Power Team

Subject: NRG Puente Power  
GE IPS: 976085  
GE PM10 Emission Guarantee

The NRG Puente Power Plant, will utilize the 7HA.01 gas turbine technology installed in a simple cycle configuration equipped with an air attemperated simple cycle SCR and CO catalyst. For this installation, GE is offering a Particulate Matter emission guarantee of 10.1 lbs/hr as measured at the emission sampling ports located at the turbine stack exit. This guarantee shall apply for the entire load range from minimum emission compliant load (MECL) through base load operation and across the guarantee ambient temperature range of 38.9 to 82 deg F.

Regards,

A handwritten signature in black ink, appearing to read 'Andrew Dicke'.

Andrew Dicke  
GE Power and Water  
Emissions and Permitting Application Engineer