

## DOCKETED

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<b>Project Title:</b>	Carlsbad Energy Center - Compliance
<b>TN #:</b>	203507
<b>Document Title:</b>	Will Serve Letter - Water and Sewer Service
<b>Description:</b>	Statement of the City of Carlsbad's willingness to serve potable water, recycled water, and sewer service to the amended CECP
<b>Filer:</b>	Bob Therkelsen
<b>Organization:</b>	Raven Energy Consulting
<b>Submitter Role:</b>	Public Agency
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January 8, 2015

George Piantka  
NRG Energy  
5790 Fleet Street  
Carlsbad, CA 92008

Dear Mr. Piantka:

We have reviewed your letter dated August 1, 2014 requesting potable, recycled water and sewer service for the Carlsbad Energy Center Project (CECP). Additionally, we have also reviewed NRG's November 21, 2014 response to the California Energy Commission's Data Request Set 4, which provides further clarification on the intended use of recycled water and the discharge of wastewater into the City's sewer system. In Carlsbad, water and recycled water service are provided by the Carlsbad Municipal Water District and sewer service is provided by the City of Carlsbad.

The City/District's response for service to the CECP is as follows:

**RECYCLED WATER:**

The recycled water demand identified in the response to data set 4 indicates that the CECP will have a maximum daily use of 464,000 gallons per day with a maximum annual use of 215 acre-feet per year. Currently, the District has the capacity to produce 8 million gallons per day and has an existing 24-inch recycled water line that terminates near the CECP at the intersection of Cannon Road and Avenida Encinas. This pipeline can provide recycled water to the CECP and meet the demand identified above except during peak summer months. However, the District is in the process of improving the system capacity and reliability of the recycled water system with the expansion of its recycled water treatment plant and construction of additional transmission pipelines in Avenida Encinas. Construction of these projects are expected to start in the spring of 2015 and be operational no later than the spring of 2017, in advance of the start-up of the CECP. As a result, the District is able to provide recycled water to the CECP and meet the maximum demands stated above.

Additionally, as requested by NRG, the District will agree to construct a public recycled water line from the intersection of Cannon Road and Avenida Encinas to the CECP as part of the City's Vista/Carlsbad Interceptor Sewer Project, with the completion of a reimbursement agreement between the District and NRG.

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**POTABLE WATER:**

The CECP potable water demand of 17,280 gallons per day identified for non-industrial use are insignificant from a water supply perspective. The District is able to provide potable water to the CECP at the rate and quantity requested through the public water system.

Since the CECP proposes to use an existing private water system extending from Cannon Road, it is recommended that NRG verify the ability of the private water system to meet current fire flow requirements as may be required by the Carlsbad Fire Department. NRG can use the City's consultant to model the fire flow scenario if required by the Fire Department.

**SEWER SERVICE:**

As identified in NRG's response to data request set 4, NRG proposes to use a different onsite pretreatment system from that originally proposed in the August 1, 2014 request for service letter. The new treatment method will substantially reduce the quantity of industrial waste to be discharged to the sewer system, now averaging less than 5 gpm. This wastewater flow, in addition to another 12 gpm of proposed sanitary wastewater flow will not negatively impact the City's sewer collection system. Therefore, the City is able to provide wastewater service to the CECP. However, since industrial waste discharges to the sewer system are regulated by the Encina Wastewater Authority, a permit will still be required of NRG from the Encina Wastewater Authority.

Please contact me if you have any questions on this response or if additional changes are made to the CECP design that would change the water, sewer or recycled water requirements.

Best Regards,



Kirsten Plonka  
District Engineer

cc: Wendy Chambers, City of Carlsbad  
Gary Barberio, City of Carlsbad  
Terry Smith, City of Carlsbad  
Ahmed Haque, NRG  
Kevin Hardy, Encina Wastewater Authority  
Paul Bushee, Leucadia Wastewater District