

DOCKETED

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January 12, 2015

Mike Conway
California Energy Commission
Siting, Transmission and Environmental Protection (STEP) Division
1516 Ninth Street, MS-15
Sacramento, CA 95814

Dear Mr. Conway:

Last week you requested some additional information related to the question of whether or not a water supply assessment (WSA) should be prepared for the amended Carlsbad Energy Center Project (CECP).

Your first question was whether the City has a current Urban Water Management Plan (UWMP). The City's most recent water management plan was prepared in 2010 and will be updated in 2016 following the schedule established by the state. The plan does not detail specific projects such as the amended CECP but does include future potable water supply and demand projections including increases for all land use categories within the City. The UWMP does include an assessment of recycled water.

Your second question related to the criteria contained in Section 10912 (a) (7) of the state water code. That section is one of several used for determining whether a project is required to have a WSA. It states that, for purposes of preparing a WSA, a project "...would demand an amount of water equivalent to, or greater than, the amount of water required by a 500 dwelling unit project." I considered that threshold criteria in preparing making my determination on whether a WSA was required for the amended CECP but determined it was not applicable.

The City's 2012 Water Master Plan states that a single-family residence uses 550 gallons of water per day for average day demand. This number is based on historical billing records and is normally used by the City for determining water demands. Using this number, a 500-unit subdivision would use 275,000 gallons/day or 100.4 million gallons or 308.1 acre-feet of water a year. The amended CECP's potable water demand is 17,280 gallons/day or 6.3 million gallons/year or 19.3 acre-feet per year. This is insignificant from a water supply perspective and is not equivalent to a 500-unit subdivision.

You also asked how the latter criteria would relate to the amended CECP if recycled water was considered. Even if recycled water was considered in deciding whether the amended CECP is a project, its maximum annual recycled water use is 215 acre-feet per year which is still below the 500-unit subdivision threshold. As I stated in my earlier letter, however, the purpose of a WSA is to assure adequate potable water is available and are not required for recycled water. As stated in Section 10910 (b) of the code, a WSA applies to projects served by public water systems and public water systems are defined in Section 10912 (c) as being "...a system for the provision of piped water to the public for human consumption that has 3,000 or more service connections." The City of Carlsbad's potable water system is a public water system that is separate and distinct from its recycled water system which is not intended for human consumption.

My conclusion remains that the amended CECP does not qualify as a project under California Water Code Section 10912 and therefore does not require a WSA.

Please let me know if you have any additional questions.

Sincerely,

A handwritten signature in blue ink that reads "Kirsten Plonka". The signature is written in a cursive, flowing style.

Kirsten Plonka
Engineering Manager