

## DOCKETED

<b>Docket Number:</b>	07-AFC-06C
<b>Project Title:</b>	Carlsbad Energy Center - Compliance
<b>TN #:</b>	203692
<b>Document Title:</b>	Power of Vision's Objections to COM-16 as proposed by Project Owner in TN# 2030660
<b>Description:</b>	N/A
<b>Filer:</b>	Arnold Roe, Ph.D.
<b>Organization:</b>	Power of Vision
<b>Submitter Role:</b>	Intervenor
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# Power of Vision

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Via E Filing  
February 13, 2015  
Carlsbad Energy Center Project (07-AFC-06C)

RE: Objections to Project Owner's Clarification to PSA Comments (TN# 203660)

Dear Messrs Monasmith and Hillard:

On February 12, 2015, in TN# 203660, project owner requested that Staff add the following Compliance COC:

**"COM-16: Previously Licensed Activities in Progress Prior to Approval of the Amended CECP.** Any activity authorized to start prior to the effective date of the Commission Decision approving the Amended CECP license is in compliance with this license if it is conducted under, and in compliance with, the original CECP license."

Power of Vision objects to project owner's request for the addition of Condition of Certification (COC) **COM-16**.

Project owner cites as the reason for this COC is: "The PSA recommends changes to many of the COCs that govern the project. Some of these changes alter Project Owner's obligations during tank removal."

However, project owner has not specified what changes to the COCs have been made in the PSA, nor does project owner specify how these changes alter project owner's obligations during tank removal.

Project owner's request to add **COM-16** may be reasonable, but without specific details justifying its insertion, **COM-16** should not be included in the FSA.

Julie Baker

Arnold Roe, Ph.D.