DOCKETED

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Document Title:	Data Responses Set 1B
Description:	Responses to Data Requests: 5-7, 29, 38-43, 45 and informal Data Requests AQ1 to 2 and TSE1 to 5
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Project Manager
Siting Office
California Energy Commission
1516 Ninth Street
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June 27, 2016

Subject: Data Response, Set 1B
Pomona Repower Project (16-SPPE-01)

Dear Lon,

On behalf of AltaGas Pomona Energy Inc. please find attached our data responses to the CEC's Data Requests 5 through 7, 29, 38 through 43 and 45, dated April 27, 2016. In addition, we are also submitting responses to informal data requests AQ1, AQ2, and TSE1 through 5.

Please let me know if you have any questions.

Regards,
CH2M HILL Engineers, Inc.

John L. Carrier, J.D.
Program Manager

Encl.

Pomona Repower Project

(16-SPPE-01)

Data Responses, Set 1B

(Responses to Data Requests 5-7, 29, 38-43, 45 and Supplemental Requests AQ1-2 and TSE1-5)

Submitted to

California Energy Commission

Prepared by

AltaGas Pomona Energy Inc.

With Assistance from

ch2m:SM

2485 Natomas Park Drive
Suite 600
Sacramento, CA 95833

June 2016

Contents

Attachments

Introduction

AltaGas Pomona Energy Inc. (AltaGas or the Project Owner) herein provides responses to the California Energy Commission (CEC) Staff's Data Requests, Set 1 regarding the Pomona Repower Project (PRP) (16-SPPE-01), dated April 27, 2016 (TN# 211275). On June 13, 2016, the Applicant received via email five additional questions on Transmission System Engineering (TSE). For convenience they have been included here in the TSE section and are numbered TSE1 through TSE5. On June 16, 2016, the Applicant received via email two additional questions seeking clarification about the project's emission reduction credits (ERC). They are included in the Air Quality section as AQ1 and AQ2.

Applicant incorporates by reference herein its Objections to Staff's Data Requests, Set 1, dated May 13, 2016 (TN# 211460). Along with that objection, Applicant requested additional time to respond to certain data requests. These data response address those that we can at this time.

As with Data Response Set 1A, these data responses are grouped by individual discipline or topic area. Within each discipline area, the responses are presented in the same order as the CEC Staff presented them and are keyed to their data request numbers.

New graphics or tables are numbered in reference to the data request number. For example, the first table used in response to Data Request 15 would be numbered Table DR15-1. The first figure used in response to Data Request 34 would be Figure DR34-1, and so on. Figures or tables from the SPPE Application that have been revised have "R1" following the original number, indicating revision 1 (see, for example, Data Response 34). Attachments in response to data requests also have been numbered with that data request. For example, the attachment in response to Data Request 17 is numbered "Attachment DR17-1."

Additional tables, figures, or documents submitted in response to a data request (for example, supporting data, stand-alone documents such as plans, folding graphics, etc.) are found at the end of each discipline-specific section and are not sequentially page-numbered consistent with the remainder of the document, though they may have their own internal page numbering system.

Air Quality

BACKGROUND

Cumulative Air Quality Impacts

The application (Section 4.1.8.1) describes the methodology for the cumulative impact analysis but does not include the analysis itself because a project list had not been provided by the District at the time the application was prepared and submitted to the Energy Commission. The cumulative analysis should include all reasonably foreseeable new projects with a potential to emit 5 tons per year or more and located within a 6-mile radius. This includes all projects that have received construction permits but are not yet operational and those that are either in the permitting process or can be expected to be in permitting in the near future. A complete cumulative impacts analysis should identify all existing and planned stationary sources that affect the baseline conditions and consider them in the modeling effort.

DATA REQUESTS

5. Please provide a copy of the District's correspondence regarding existing and planned cumulative sources located within six miles of the project site.

   Response: The Applicant is still waiting to get the correct data set from the District. This data response will be submitted once the correct data set is received and analyzed.

6. Please provide the list of sources to be considered in the cumulative air quality impact analysis.

   Response: The Applicant is still waiting to get the correct data set from the District. This data response will be submitted once the correct data set is received and analyzed.

7. Please provide the cumulative modeling and impact analysis, including Pomona Repower Project (PRP) and other identified new and planned projects within 6 miles of the PRP site.

   Response: The Applicant is still waiting to get the correct data set from the District. This data response will be submitted once the correct data set is received and analyzed.

BACKGROUND

These data requests were received by email on June 16, 2016. They are additional questions regarding the SPPE Application.

DATA REQUESTS

AQ1. According to Table 4.1-34 of the SPPE application, Pomona is required to provide NOx and VOC offsets based on district regulations. However, the amounts required (NOx 40,020 lbs/year, VOC 85.0 lbs/day) do not take into account any credits by shutting the existing San Gabriel facility. Is it because the owner is uncertain how [the] district will process the credits and therefore did not include [them] in the table, or there will be no credits at all?

Response: With regards to the 85 lbs/day of volatile organic compound (VOC) emission reduction credits (ERCs) required for the Pomona Repower Project (PRP), the Applicant does not know the amount of VOC ERCs the South Coast Air Quality Management District (SCAQMD) will ultimately issue for the shutdown of the existing equipment at the San Gabriel facility. Also, there is a timing issue. For the SCAQMD to process a VOC ERC application for the shutdown of the existing equipment at the San Gabriel Facility it is necessary to surrender the SCAQMD operating permit for this equipment. Because the VOC ERCs for PRP must be provided to the SCAQMD prior to the issuance of the Permit to Construct (PTC) for the new equipment, attempting to use VOC ERCs from the shutdown of the existing equipment would mean that the existing equipment would need to be permanently retired prior to the issuance of the PTC for the new equipment. This would severely limit the operational flexibility of the facility. Therefore, the Applicant has decided to obtain the necessary VOC ERCs by purchasing them from the ERC market.

With regards to the 40,020 lbs/year of NOx RECLAIM Trading Credits (RTCs) required for the PRP, as shown on Table 4.1-34 of the SPPE application the 5,000 lbs/year of NOx RTCs currently held in the San Gabriel facility NOx RTC allocation account is being used as part of the mitigation package for the necessary PRP NOx RTCs. The remainder of the NOx RTCs will be purchased from the NOx RTC market.

AQ2. In addition, I want to confirm that the owner currently owns 5,000 lbs/day of NOx RTCs and no VOC ERCs. Are the NOx RTCs owned under the existing San Gabriel facility?

Response: As discussed in AQ1 above, the 5,000 lbs/year of NOx RECLAIM trading credits (RTCs) are currently in the NOx RTC allocation account for the San Gabriel Facility, which is owned by AltaGas Pomona Energy Inc. The Applicant does not currently own any VOC ERCs.

Traffic & Transportation

BACKGROUND

Airspace Obstructions

As identified in the SPPE Section 4.12.4.6 (Air Traffic), Federal Aviation Administration (FAA) Regulation, 14 C.F.R. Part 77, establishes standards for determining obstructions in navigable airspace and sets forth requirements for notification of proposed construction activities that occur over 200 feet above ground level (AGL). As noted in the SPPE Section 4.12.3.1, "Brackett Field is a public airport owned by the County of Los Angeles …and is located 2.1 miles north of the project site." Section 4.12.4.6 notes PRP submitted FAA Form 7460-1, Notice of Construction or Alteration, for the exhaust stack to request that the FAA review PRP for any potential hazards to air navigation. On January 7, 2016, the FAA responded with a determination of no hazard to air navigation. Staff reviewed a copy of the determination provided in Appendix 4.12a. As noted on page 2, the "determination does include temporary construction equipment cranes, derricks, etc. which may be used during actual construction of the structure. However, this equipment shall not exceed the overall heights as indicated above [90 feet AGL]. Equipment which has a height greater than the studied structure requires separate notice to the FAA." It is likely that a construction crane would extend higher than 90 feet AGL which would require the submittal of an additional 7460-1 form to the FAA.

The SPPE does not identify the potential use of cranes during construction of the proposed project.

DATA REQUESTS

29. If the construction crane(s) would be higher than 90 feet AGL, please provide a copy of the 7460-1 form(s) submitted to the FAA and a copy of FAA's Hazard Determination(s).

    Response: A copy of FAA's Determination of No Hazard to Air Navigation for Temporary Structure, dated May 31, 2016, is provided as Attachment 29-2.

ATTACHMENT DR29-2,
FAA Determination of No Hazard

Mail Processing Center
Federal Aviation Administration
Southwest Regional Office
Obstruction Evaluation Group
10101 Hillwood Parkway
Fort Worth, TX 76177

Aeronautical Study No.
2016-AWP-4488-OE

Issued Date: 05/31/2016

Angela Wolfe
CH2M HILL
6 Hutton Centre Dr.
Santa Ana, CA 92707

****DETERMINATION OF NO HAZARD TO AIR NAVIGATION FOR TEMPORARY STRUCTURE****

The Federal Aviation Administration has conducted an aeronautical study under the provisions of 49 U.S.C., Section 44718 and if applicable Title 14 of the Code of Federal Regulations, part 77, concerning:

Structure:	Crane
Location:	Pomona, CA
Latitude:	34-03-32.92N NAD 83
Longitude:	117-46-25.22W
Heights:	827 feet site elevation (SE)
	130 feet above ground level (AGL)
	957 feet above mean sea level (AMSL)

This aeronautical study revealed that the temporary structure does not exceed obstruction standards and would not be a hazard to air navigation provided the following condition(s), if any, is (are) met:
Based on this evaluation, marking and lighting are not necessary for aviation safety. However, if marking/ lighting are accomplished on a voluntary basis, we recommend it be installed and maintained in accordance with FAA Advisory circular 70/7460-1 L.

This determination expires on 12/01/2017 unless extended, revised, or terminated by the issuing office.

NOTE: REQUEST FOR EXTENSION OF THE EFFECTIVE PERIOD OF THIS DETERMINATION MUST BE E-FILED AT LEAST 15 DAYS PRIOR TO THE EXPIRATION DATE. AFTER RE-EVALUATION OF CURRENT OPERATIONS IN THE AREA OF THE STRUCTURE TO DETERMINE THAT NO SIGNIFICANT AERONAUTICAL CHANGES HAVE OCCURRED, YOUR DETERMINATION MAY BE ELIGIBLE FOR ONE EXTENSION OF THE EFFECTIVE PERIOD.

This determination is based, in part, on the foregoing description which includes specific coordinates and heights. Any changes in coordinates and/or heights will void this determination. Any future construction or alteration, including increase to heights, requires separate notice to the FAA.

This determination does include temporary construction equipment such as cranes, derricks, etc., which may be used during actual construction of a structure. However, this equipment shall not exceed the overall heights as indicated above. Equipment which has a height greater than the studied structure requires separate notice to the FAA.

This determination concerns the effect of this temporary structure on the safe and efficient use of navigable airspace by aircraft and does not relieve the sponsor of compliance responsibilities relating to any law, ordinance, or regulation of any Federal, State, or local government body.

Any failure or malfunction that lasts more than thirty (30) minutes and affects a top light or flashing obstruction light, regardless of its position, should be reported immediately to (877) 487-6867 so a Notice to Airmen (NOTAM) can be issued. As soon as the normal operation is restored, notify the same number.

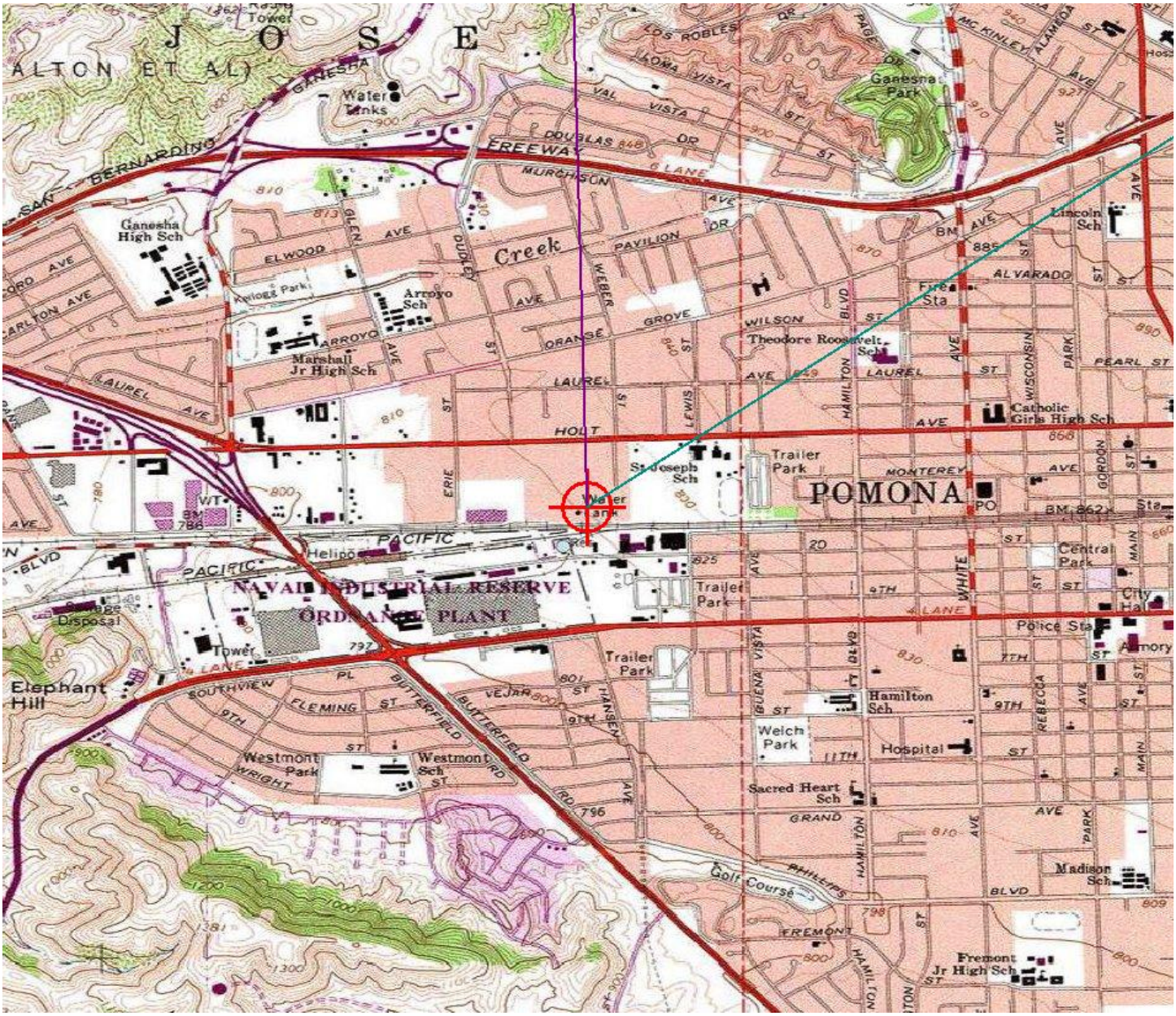
A copy of this determination will be forwarded to the Federal Aviation Administration Flight Procedures Office if the structure is subject to the issuance of a Notice To Airman (NOTAM).

If you have any questions, please contact our office at (310) 725-6558. On any future correspondence concerning this matter, please refer to Aeronautical Study Number 2016-AWP-4488-OE

Signature Control No: 291322158-293983143 (TMP)
LaDonna James
Technician

Attachment(s)
Map(s)

Verified Map for ASN 2016-AWP-4488-OE



Transmission System Engineering

BACKGROUND

These data requests were received by email on June 13, 2016. They are additional questions regarding the SPPE Application and the Queue Cluster 8 Phase I report. To indicate that they are supplemental questions, they are numbered beginning with "S." Otherwise they retain the same numbering as in the email.

Transmission Facilities

As shown in the Queue Cluster 8 Phase I Report, page 2, Figure A.1, the point of interconnection is between the Pole-Switch 369 (Normally open) and the Ganesha Substation.

DATA REQUESTS

TSE1. Clarify if the "New Distribution Provider Tapped Substation" is the "SCE WDT1288 Substation".

Response: The Queue Cluster 8 Phase I Report was prepared by Southern California Edison (SCE). The Applicant does not have that information in its possession and suggests that CEC staff contact SCE directly. We recommend starting with the following individual:

John E. Tucker
Project Manager
Southern California Edison
Grid Interconnection & Contract Development
909-274-3440/PAX 63440
Mobile: 626-862-4325
John.Tucker@sce.com

TSE2. Provide the sizes of the breaker and disconnect switches in the "New Distribution Provider Tapped Substation".

Response: See Data Response TSE1.

TSE3. As stated in page 4, Table A.1 Project General Information, the Gen-Tie line would be 0.28 mile; however, the AFC proposed a 0.2 mile-long gen-tie line. Please explain the discrepancy.

Response: Based upon the GIS drawing in SPPE Figure 1.2-3, the length of the line segment to be reconductored (i.e., the yellow line) is about 1,074 feet long, or about 0.203 miles long. We have no idea why SCE used a distance of 0.28 miles.

TSE4. The proposed 397.5 ACSR gen-tie overhead conductor may not be able to carry all the output from the PRP. Please check on the conductor size and rating.

Response: See Data Response TSE1.

TSE5. Clarify sections listed in the table below. Resubmit Figure A.1 (page 2) of the Queue Cluster 8 Phase I Report, with clear labels in segments if the gen-tie line would be built with different types of conductors. Provide the conductor length, type, size, and current carrying capacity of the gen-tie line.

Page 2, Figure A.1	The gen-tie line would be 0.2 miles and would use 397.5 ACSR overhead conductor
Page 4, Queue Cluster 8 Phase I – Attachment 1, Section (iv) 1.	"The Phase I Interconnection Study assumed nine (9) wood poles, one (1) new 66 kV switch, and 5000 feet 653 Aluminum Conductor Steel Reinforced (ACSR) conductor between SCE WDT1288 and to the to the tap point on the Ganesha 66 kV line".
Page 6, Section 3 (b)	Reconductor the existing distribution line from the new tap substation SCE WDT1288 to Ganesha 66 kV Line to 954 SAC (approximately 0.28 miles).

Response: See Data Response TSE1.

Visible Plume

BACKGROUND

Cooling Tower Operating Data

Staff needs to address the visual impact associated with water vapor plumes emitted from the proposed cooling tower. The impact assessment should be based on the results of a visible plume modeling analysis.

DATA REQUESTS

38. Please summarize for the proposed cooling tower the conditions that affect vapor plume formation including cooling tower heat rejection, exhaust temperature, and exhaust mass flow rate. Please provide values to complete or correct the table below. All combinations of temperature and relative humidity, if provided by the applicant, will be used to represent the cooling tower exhaust conditions.

	Case 1	Case 2	Case 3	…
Operating Mode				
Number of Cells				
Cell Height (m)	2	2	2	
Cell Diameter (m)	10.668	10.668	10.668	
Tower Housing Length (m)	6.096	6.096	6.096	
Tower Housing Width (m)				
Ambient Temperature (°F)				
Ambient Relative Humidity				
Number of Cells in Operation				
Heat Rejection (MW/hr)				
Exhaust Temperature (°F)				
Exhaust Flow Rate per cell (lbs/hr)				

Response: The requested PRP cooling tower exhaust parameters are included in the visible plume analysis enclosed as Attachment DR39-1

39. Please provide the detailed visible plume modeling analysis. The Combined [sic][1] Stack Visible Plume (CSVP) model is preferred by Energy Commission staff. If another model is to be used, please justify the use of that model.

Response: Enclosed as Attachment DR-39 is the CSVP visible plume modeling analysis for the PRP cooling tower. As discussed in this analysis, when the CSVP modeling results are adjusted for the maximum expected annual capacity factor of the PRP gas turbine generating unit, the visible plume frequency during seasonal daylight clear hours is below the CEC established significance level of 20 percent.

[1] The CEC Staff has historically referred to this as the Combustion Stack Visible Plume model.

ATTACHMENT DR39-1
Visible Plume Modeling Analysis

Introduction

The following is the visible plume modeling analysis for the new cooling tower proposed as part of the Pomona Repower Project (PRP). This assessment also examines the visible plume for the existing cooling tower at the San Gabriel Facility.

1.1 Visible Plume Modeling

The Staff's preferred model, the Combustion Stack Visible Plume (CSVP) model, was used to estimate the visible plume frequency for both the new PRP cooling tower and the existing San Gabriel Facility cooling tower. The CSVP model uses hourly cooling tower exhaust parameters and hourly ambient meteorological data to determine the frequency of visible plumes due to water vapor in the exhaust from the cooling towers. The CSVP model is based on the algorithms in the Industrial Source Complex (ISC2) dispersion model to determine conditions at the exhaust plume centerline. The CSVP model combines the exhaust from multiple cooling tower exhaust vents into an equivalent single exhaust vent. This method may overestimate cooling tower visible plume dimensions (particularly height) during hours with higher wind speeds due to limited cooling tower cell interaction and the increased potential for building downwash, but will be more accurate during low wind and calm periods when the exhausts from the cooling tower cells will combine into one coherent plume. The same 5-year (2008-2012) Pomona meteorological data set used for the air quality modeling and health risk assessment analysis included in the PRP SPPE application was used for this cooling tower CSVP model visible plume assessment.

1.2 Cloud Cover Data Analysis

The CEC-recommended visible plume frequency of 20 percent during seasonal (period from November through April), daylight, no rain/fog, high visual contrast hours (i.e., "clear hours") was used to determine potential visible plume impact significance. The CEC methodology[2] used to determine clear hours is provided below.

> The Energy Commission has identified a "clear" sky category during which visible plumes have the greatest potential to cause adverse visual impacts. Staff has included in the "Clear" category a) all hours with sky cover equal to or less than 10 percent plus b) half of the hours with total sky cover 20-90 percent. The rationale for including these two components in this category is as follows: a) visible plumes typically contrast most with sky under clear conditions and, when total sky cover is equal to or less than 10 percent, clouds either do not exist or they make up such a small proportion of the sky that conditions appear to be virtually clear; and b) for a substantial portion of the time when total sky cover is 20-90 percent the opacity of sky cover is relatively low (equal to or less than 50 percent), so this sky cover does not always substantially reduce contrast with visible plumes; staff has estimated that approximately half of the hours meeting the latter sky cover criteria can be considered high visual contrast hours and are included in the "clear" sky definition.

If the CSVP modeling results indicate that seasonal daylight, clear hour, visible plume frequency is greater than 20 percent, then additional CSVP modeling runs must be performed to determine the dimensions of the visible plume.

[2] Hydrogen Energy California Project, 08-AFC-8A, Preliminary Staff Assessment/Draft Environmental Impact Statement, Appendix VR-2, page 4.13-65.

1.3 Cooling Tower Design and Operating Parameters

Tables DR39-1 and DR39-2 summarize the design and exhaust parameters for the new PRP and existing San Gabriel Facility cooling towers, respectively. The data presented in these tables were used for the CSVP visible plume modeling.

Table DR39-1
New PRP Cooling Tower Operating and Exhaust Parameters[a]

Parameter				
Number of Active Cells		2 Cells		
Cell Height		35 feet		
Cell Diameter (equivalent single vent)		28 feet		
Tower Housing Length		87 feet		
Tower Housing Width		35 feet		
Number of Cells In Operation	**Ambient Condition**	**Heat Rejection Rate (MW/hr)**	**Exhaust Flow Rate (klbs/hr)**	**Exhaust Temperature (°F)**
2 Cells	28°F, 60% RH	29.0	4,835	64.0
2 Cells	59°F, 60% RH	32.9	4,684	81.6
2 Cells	74°F, 31% RH	35.1	4,640	85.6
2 Cells	99.8°F, 22% RH	34.1	4,548	93.2

Notes:
a. The heat rejection and exhaust flow rates are based on the ambient condition shown and gas turbine operating at full load. The heat rejection/exhaust flow rates represent the combined values for both cooling tower cells in operation.

Table DR39-2
Existing San Gabriel Facility Cooling Tower Operating and Exhaust Parameters[a]

Parameter				
Number of Active Cells		2 Cells		
Cell Height		13.3 feet		
Cell Diameter (equivalent single vent)		14.1 feet		
Tower Housing Length		24.3 feet		
Tower Housing Width		22.5 feet		
Number of Cells In Operation	**Ambient Condition**	**Heat Rejection Rate (MW/hr)**	**Exhaust Flow Rate (klbs/hr)**	**Exhaust Temperature (°F)**
2 Cells	28°F, 60% RH	2.0	340	64
2 Cells	59°F, 60% RH	2.3	329	82
2 Cells	74°F, 31% RH	2.4	326	86
2 Cells	99.8°F, 22% RH	2.4	320	94

Notes:
a. The heat rejection and exhaust flow rates are based on the ambient condition shown and gas turbine operating at full load. The heat rejection/exhaust flow rates represent the combined values for both cooling tower cells in operation.

1.4 Cooling Tower Visible Plume Modeling Results

Tables DR39-3 and DR39-4 summarize CSVP model's visible plume frequency results for the new PRP cooling tower and the existing San Gabriel Facility cooling tower, respectively.

Table DR39-3
New PRP Cooling Tower
Frequency of Modeled Visible Plumes
Full-Load Operation 8,760 Hours per Year

Period	Total Hours Modeled[a] (hr)	Hours with Modeled Visible Plume (hr)	Frequency
All Hours	43,021	21,419	49.8%
Daylight Hours	21,937	5,791	26.4%
Daylight No Rain No Fog Hours	21,399	5,277	24.7%
Seasonal Daylight No Rain No Fog Hours[b]	9,474	3,129	33.0%
Seasonal Daylight Clear Hours[b]	6,077	1,587	26.1%

Notes:
a. This represents the total number of valid hours in the 5-year meteorological data base for the period in question.
b. Seasonal hours occur during the period from November 1 through the end of April.

Table DR39-4
Existing San Gabriel Facility Cooling Tower
Frequency of Modeled Visible Plumes
Full-Load Operation 8,760 Hours per Year

Period	Total Hours Modeled[a] (hr)	Hours with Modeled Visible Plume (hr)	Frequency
All Hours	43,021	20,547	47.8%
Daylight Hours	21,937	8,284	37.8%
Daylight No Rain No Fog Hours	21,399	4,686	21.9%
Seasonal Daylight No Rain No Fog Hours[b]	9,474	2,722	28.7%
Seasonal Daylight Clear Hours[b]	6,077	1,367	22.7%

Notes:
This represents the total number of valid hours in the 5-year meteorological data base for the period in question.
Seasonal hours occur during the period from November 1 through the end of April.

As shown in the tables above, for the new PRP cooling tower and the existing San Gabriel Facility cooling tower, the CSVP model shows visible plume frequencies during seasonal daylight, clear hours of approximately 26 percent and 23 percent, respectively. Therefore, there is no substantial difference between the visible plume frequencies of the new PRP cooling tower and those of the existing San Gabriel Facility cooling tower. The CSVP modeling is based on full load operation of the gas turbine generator for 8,760 hours per year. As discussed in the PRP SPPE application,[3] the annual capacity factor of the new gas turbine generating unit is expected to range from approximately 20 percent to 43 percent, rather than the 100 percent annual capacity factor used in the CSVP modeling. If the CSVP modeling results are adjusted to the high end of the expected annual capacity factor for the PRP gas turbine generator, the modeled visible plume frequency during seasonal daylight, clear hours drops down to approximately 11 percent, which is below the CEC 20 percent significance level. A similar result occurs if the visible plume frequency of the existing San Gabriel Facility cooling tower is adjusted for the annual capacity factor. Over the past 5 years (2011 to 2015), the annual capacity factor of the San Gabriel Facility has ranged from approximately 28 percent to 38 percent. If the CSVP modeling results are adjusted to the high end of this range of annual capacity factors, the modeled visible plume frequency for the existing San Gabriel Facility cooling tower during seasonal daylight, clear hours drops

[3] Pomona Repower Project, 2016-SPPE-01, SPPE Application, Section 2.4.

down to approximately 9 percent, which is below the CEC 20 percent significance threshold. Because both the PRP cooling tower and San Gabriel Facility cooling tower CSVP-modeled visible plume frequencies are below 20 percent when adjusted for annual capacity factors, there is no need to perform additional modeling to determine the visible plume dimensions. The detailed CSVP modeling input and output files are provided on compact disc to the CEC under separate cover. Copies will be provided to others upon request.

Conclusions

Visible plumes for the proposed PRP cooling tower are predicted to occur less than 20 percent of seasonal daylight, clear hours. Therefore, the visual plume impacts for the PRP cooling tower, like those of the existing San Gabriel Facility, are not expected to be significant.

Water Resources

BACKGROUND

Potable and Recycled Water

The application states that the city of Pomona has available recycled water and has agreed to serve PRP with the volume of recycled water required (estimated average of 170.8 acre feet per year (afy)). The application also states that the existing city potable water connections would be used (estimated average of 49.4 afy). The PRP proposes to use potable water for evaporative inlet air-cooling and NOx control. Recycled water would be used for intercooler cooling tower makeup water.

DATA REQUESTS

40. Please provide a will-serve letter or agreement for the recycled water supply.

    Response: A will-serve letter has been requested from the City of Pomona and will be supplied as soon as it is received.

41. Please provide a will-serve letter or contract for the potable water supply.

    Response: A will-serve letter has been requested from the City of Pomona and will be supplied as soon as it is received.

42. Would a Water Supply Assessment (WSA) be required for the potable water supply?
    a. If no, please provide a detailed explanation why.
    b. If yes, please provide the WSA or a WSA preparation schedule for the potable water supply.

    Response: A WSA for potable water—or explanation as to why one is not needed—has been requested from the City of Pomona and will be supplied as soon as it is received.

43. Would a Water Supply Assessment be required for the recycled water supply?
    a. If no, please provide a detailed explanation why.
    b. If yes, please provide the WSA or a WSA preparation schedule for the recycled water supply.

Response: A WSA for recycled water—or explanation as to why one is not needed—has been requested from the City of Pomona and will be supplied as soon as it is received.

BACKGROUND

Wastewater Discharge

The AFC states that Pomona Water Reclamation Plant, operated by the Sanitation Districts of Los Angeles County, has available capacity to receive and treat the proposed wastewater discharge by PRP. PRP would discharge an estimated 37.5 afy of wastewater.

DATA REQUEST

45. Please provide a will-serve letter or agreement for the proposed wastewater discharge.

Response: A will-serve letter has been requested from the City of Pomona and will be supplied as soon as it is received.