

DOCKETED

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February 28, 2014

Mr. Bruce Boyer
Compliance Project Manager
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

SUBJECT: Turlock Irrigation District Almond 2 Power Plant (09-AFC-2C), Comments on Staff Analysis of Proposed Modifications to Air Quality Conditions of Certification

Dear Mr. Boyer:

The Turlock Irrigation District (the "TID") appreciates the opportunity to comment on the Staff Analysis for TID's amendment seeking modifications to Conditions of Certification AQ-41 and 47 for the Almond 2 Power Plant ("A2PP"). TID concurs with the Staff Analysis. A minor correction is necessary for Condition of Certification AQ-1. In addition, TID would like to provide comments on a few sections of the analysis.

As for the one minor correction, Condition AQ-1 was revised to reflect that the Authorities to Construct issued by the San Joaquin Valley Air Pollution Control District (the "SJVAPCD") are to be converted into Permits to Operate. However, the Authority to Construct permit numbers in Staff's analysis of Condition AQ-1 are incorrect. The Condition should be corrected to read:

AQ-1 The Authority to Construct N-3299-4-0 (or N-3299-5-0, N-3299-6-0) ~~N-3299-4, N-3288-6-0~~ shall be converted into Permit to Operate prior to or concurrently with the implementation of this permit. [District Rule 2201]

Beyond this one correction, TID also welcomes the opportunity to provide comments and additional clarifications. TID filed an amendment petition and then re-filed this petition in its current form on February 22, 2013. The substance of the original filing and the re-filed petition is the same. TID was informed that the original filing had to be resubmitted since it relied too heavily on documentation prepared for the SJVAPCD. While we appreciate that the CEC Amendment process is separate and distinct from the SJVAPCD's process, we also hope that the Staff will work with TID going forward to avoid unnecessary duplication and expenditure of resources, focusing on substance and not form.

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Second, TID did not request deletion of conditions that had been satisfied and are no longer applicable to the operating project (i.e., conditions related to project construction and commissioning). Instead, TID met with Staff on August 8, 2013 to discuss the amendment. By that date, the modifications had already been approved by the SJVAPCD. Specifically, on June 3, 2013, the SJVAPCD issued revised Authorities to Construct (ATCs) implementing the requested amendments, and on June 25, 2013, the SJVAPCD notified TID that the changes had also been incorporated into the A2PP's Title V Operating Permit. In addition to TID's requested amendments, the SJVAPCD made additional changes to the conditions in the three turbine ATCs and Title V Operating Permit for the facility. In its June 2013 approvals, the SJVAPCD deleted the conditions pertaining to A2PP construction and commissioning since they were no longer relevant. The SJVAPCD also renumbered the remaining conditions, after deleting the no longer applicable construction and commissioning conditions. The deletions and renumbering changes were not specifically requested by TID.

Nevertheless, given the SJVAPCD's approvals in June of 2013, TID thereafter discussed with CEC air quality Staff the possibility of having the CEC's proposed changes conform to those in the SJVAPCD's June 2013 approvals. Staff informed TID that it could delete the no longer applicable conditions, but it would not renumber the remaining conditions. TID does not object to the Staff's decision to delete the satisfied conditions. However, TID's suggestion to Staff was to both delete and renumber the conditions, since this would provide consistent numbering of the SJVAPCD and the CEC air quality conditions. TID has no objection to two agencies differing approaches to numbering and striking out of Conditions already satisfied, but again we would hope in the future for closer coordination between all parties in the interest of ease of administration by TID and the agencies.

Finally, the CEC Staff has added language to the Verification of AQ-41 beyond what the SJVAPCD and EPA believed necessary. While TID will comply with the intent of the Verification language, as described in the Staff Analysis, TID understands this additional language adds no substantive requirements to the Condition.

TID appreciates the opportunity to provide these comments on the Staff Analysis to TID's amendment petition. Should you have any questions regarding these comments, please contact George Davies at 209-883-3451 or Susan Strachan at 530-757-7038. Thank you.

Sincerely,



Brian LaFollette
Assistant General Manager
Turlock Irrigation District