CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET
SACRAMENTO, CA 95814-5512

June 21, 2006

Mr. Tom McCabe
Regional Vice President, Environmental Health & Safety
Edison Mission Energy
18101 Von Karman Avenue, Suite 1700
Irvine, CA 92612-1046

Dear Mr. McCabe:

RE: SECOND ROUND DATA REQUESTS (100-104) FOR WALNUT CREEK ENERGY PARK (05-AFC-2)

Pursuant to Title 20, California Code of Regulations, Section 1716, the California Energy Commission staff seeks the information specified in the enclosed data requests. The information requested is necessary to: 1) more fully understand the project; 2) assess whether the facility will be constructed and operated in compliance with applicable regulations; 3) assess whether the project will result in significant environmental impacts; and 4) assess potential mitigation measures.

These data requests (#100-104) are being made in the areas of Project Description and Visible Plume Modeling. Written responses to the enclosed data requests are due to the Energy Commission staff on or before July 21, or at such later date as may be mutually agreeable.

If you are unable to provide the information requested, need additional time, or object to providing the requested information, please send a written notice to both the Committee and me within 10 days of receipt of this notice. The notification must contain the reasons for not providing the information, the need for additional time and the grounds for any objections (see Title 20, California Code of Regulations, section 1716 (f)).

If you have any questions, please call me at (916) 653-1850 or email me at eknight@energy.state.ca.us.

Sincerely,

Eric Knight
Project Manager

Enclosure

cc: Docket (05-AFC-2)
Proof of Service List

PROOF OF SERVICE (REVISED 2-23-06) FILED WITH
ORIGINAL MAILED FROM SACRAMENTO ON 6-21-06

Technical Area: Project Description
Author: Eric Knight

BACKGROUND

The AFC states that Edison Mission Energy (EME) has entered into a lease option agreement with the City of Industry Urban Development Agency for the project site (page 2-1). This agreement will be assigned to and exercised by Walnut Creek Energy, LLC (WCE), who will take physical possession of the project site after the warehouse that currently occupies the site is demolished. As stated in the May 2006 supplemental data response filing, the applicant will be providing a letter from the City of Industry as evidence that a lease agreement exists between EME and the City of Industry for use of the power plant site (see Workshop Question 5 [WSQ-5] under the topic of Land Use). While this information will be useful for an evaluation of whether the site will be available to the applicant for the intended purpose, staff must also be aware of, and evaluate, any conditions contained in the lease that could have environmental consequences or impacts to public health and safety. Thus, a copy of the actual lease option agreement is required by staff.

DATA REQUEST

100. Please provide a copy of the signed lease option agreement between EME and the City of Industry Urban Development Agency. The applicant may redact any sensitive financial information contained in the lease option agreement.

BACKGROUND

The AFC states that construction laydown and parking areas will be within existing site boundaries and on the Southern California Edison (SCE) transmission line easement north of the project site (page 2-18). WSQ-4 states that EME has available the entire area of the SCE easement north of the project site for construction parking and laydown. Staff had informally requested that the applicant provide a copy of a letter from SCE demonstrating that the easement would be available to EME for project construction-related purposes. The May 2006 supplemental data response filing makes no reference to provision of this letter (see WSQ-5). Staff inquired about the status of the letter and was informed by the applicant that the letter would not be from SCE, but from Logistics Terminals, Incorporated, who, as stated in WSQ-6, holds a lease agreement with SCE to use the same portion of the transmission line easement north of the WCEP site for container storage. The use of the same property by another entity was not disclosed in the AFC, and brings into question whether the SCE property will be available to the applicant when construction on the project begins. Staff requires a copy of the lease agreement with Logistics Terminals, Inc., so staff may assess the availability of the SCE property for the project, and evaluate any conditions in the lease that could have impacts on the environment and/or public health and safety.

DATA REQUEST

101. Please provide a copy of the signed lease agreement between the applicant and Logistics Terminals, Inc. The applicant may redact any sensitive financial information contained in the lease agreement.

Walnut Creek Energy Park (05-AFC-2)
Data Requests

Technical Area: Visible Plume Modeling
Author: William Walters

BACKGROUND

Analysis of the cooling tower data provided in the May 2006 supplemental response to Data Request 81 indicates that the exhaust temperature and inlet/outlet water temperatures are much higher than for other cooling towers that staff has analyzed over the past four years. Cooling tower "relative" air flow is directly related to the plume potential for that cooling tower. A comparison of the full load "relative" air flow per heat rejection rate for this project and other recent peaker and combined-cycle projects is as follows. The lower the relative air flow rate, the higher the plume frequency.

- Walnut Creek – 5.6 to 9.3 kg/s/MW
- Los Esteros – 20.4 to 22.0 kg/s/MW
- San Francisco Energy Reliability Project (SFERP) – 19.9 kg/s/MW (minimum)
- Roseville – 13.6 to 16.2 kg/s/MW
- Inland Empire – 28.4 kg/s/MW
- Blythe II – 15.1 to 20.3 kg/s/MW
- Consumnes – 19.1 to 21.8 kg/s/MW

Due to turbine intercoolers and other factors, this project is more comparable to a combined-cycle project the size of the Roseville project than to the two simple-cycle projects (Los Esteros and SFERP) shown for comparison.

Staff realizes that the cooling application for this project is different than that for a combined-cycle project (turbine intercooler vs. heat exchange for steam condensation). However, the variation between the cooling tower data provided for this project and previous siting case cooling tower data requires that we ask the following data requests.

DATA REQUESTS

102. Please confirm the cooling tower data provided in the supplemental data response, or provide corrections to this data as necessary.
103. Please explain the low air flow for this cooling tower and describe the technical differences between the cooling for this project and the cooling for combined-cycle projects that allow for the WCEP's higher cooling water temperatures and very low cooling tower air flows.
104. Please discuss whether the cooling tower could be redesigned to allow for higher air flow rates (around 15 kg/s/MW), or whether there are other design changes that would effectively reduce the frequency of visible plumes.

CALIFORNIA
ENERGY
COMMISSION

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ELECTRONIC PROOF OF SERVICE LIST and ELECTRONIC DISTRIBUTION LIST Revised 05/26/06

WALNUT CREEK ENERGY PARK
APPLICATION FOR CERTIFICATION
DOCKET NO. 05-AFC-2

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I declare that I transmitted the foregoing document via e-mail, or as indicated by first class postal mail, to the above named on the date indicated thereby. I declare under penalty of perjury that the foregoing is true and correct.

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