Ms. Angela Hockaday  
California Energy Commission  
Docket Unit, MS-4  
1516 Ninth Street  
Sacramento, CA 95814-5512

SUBJECT: PG&E’S COMMENTS ON THE PRESIDING MEMBER’S PROPOSED DECISION  
COLUSA GENERATING STATION  
DOCKET NO. (06-AFC-9)

Dear Ms. Rodriguez:

Enclosed for filing with the California Energy Commission are one original and 12 (Twelve) copies of PG&E’S COMMENTS ON THE PRESIDING MEMBER’S PROPOSED DECISION, for the Colusa Generating Station Project (06-AFC-9).

Sincerely,

[Signature]
Marguerite Cosens  
Administrative Assistant  
GalatiBlek
PG&E hereby files its comments on the Colusa Generating Station Presiding Member's Proposed Decision (PMPD). We appreciate the Committee's work in correctly capturing the evidentiary record and the various agreements between the parties. We offer the following comments for the Committee's consideration and will be prepared to discuss each in detail at the Committee Conference on April 14, 2008. We have also reviewed the comments offered by Staff and agree with each of them.

**Transmission System Engineering**

Page 77, Summary and Discussion of Evidence, 1. Project Description – The second sentence incorrectly identifies that the high side of each transformer would be connected to the CGS switchyard via 2,000-Amp breakers. The term “2,000-Amp breakers” should be replaced with “disconnect switches”.

**Transmission Line Safety and Nuisance**

Page 96, Potential Impacts, Nuisance Shocks- The last sentence of the paragraph refers to compliance with TLSN-5, which should be TLSN-2.
Air Quality

PG&E requests modification be made to Condition of Certification AQ-27 affecting the timing of the surrendering of PM10 Emission Reduction Credits (ERCs) to offset the facility PM10 emissions. Construction of the facility will generate PM10 emissions and operation of the facility will generate PM10 emissions. The amount of PM10 ERCs that must be surrendered prior to construction should not be more than those required to mitigate any potential impact from construction related PM10 emissions. The current version of Condition of Certification AQ-27 requires the Project Owner to surrender all of the PM10 Emission Reduction Credits (ERCs) in amounts that would offset the emissions from full operation of the facility, which far exceed the amount of PM10 that may be generated during construction activities. Since the purpose of surrendering these PM10 ERCs early, prior to construction rather than prior to operation, is to mitigate construction PM10 emissions, PG&E respectfully requests the following modification to AQ-27.

AQ-27 Offsets for the Colusa Generating Station power plant shall be in effect prior to operation of the facility and shall not be less than the following amounts at any time. The offsets presented in the table below reflect distance factors and the VOC:NOX interpollutant ratio. All Sufficient ERCs for PM10 will be provided prior to start of construction activities to offset construction PM10 emissions.

Verification: At least 30 days prior to commencing construction, the project owner shall surrender PM10 ERC certificates in the amounts sufficient to offset the construction PM10 emissions shown above to the District and provide documentation of that surrender to the CPM and APCO. At least 60 days prior to commencing CTG first fire, the project owner shall surrender the remaining ERC certificates to offset the emissions in the amounts shown above, and as required in Condition AQ-SC7, to the District and provide documentation of that surrender to the CPM and APCO.
We appreciate the opportunity to provide the comments on the PMPD and look forward to participating in the upcoming Committee Conference on the PMPD on April 14, 2008.

Dated: April 9, 2008

Respectfully Submitted,

SCOTT A. GALATI
Counsel to PG&E
APPLICATION FOR CERTIFICATION
FOR THE COLUSA GENERATING
STATION PROJECT

Docket No. 06-AFC-9
PROOF OF SERVICE
(REVISED 8/22/2007)

INSTRUCTIONS: All parties shall 1) send an original signed document plus 12 copies OR 2) mail one original signed copy AND e-mail the document to the web address below, AND 3) all parties shall also send a printed OR electronic copy of the documents that shall include a proof of service declaration to each of the individuals on the proof of service:

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DECLARATION OF SERVICE

I, Marguerite Cosens, declare that on April 3, 2008, I deposited copies of the attached PACIFIC GAS & ELECTRIC COMPANY'S COMMENTS ON THE PRESIDING MEMBER'S PROPOSED DECISION in the United States mail at Sacramento, California with first-class postage thereon fully prepaid and addressed to those identified on the Proof of Service list above.

OR

Transmission via electronic mail was consistent with the requirements of California Code of Regulations, title 20, sections 1209, 1209.5, and 1210. All electronic copies were sent to all those identified on the Proof of Service list above.

I declare under penalty of perjury that the foregoing is true and correct.

[Signature]
Marguerite Cosens

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