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February 16, 2012

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Mike Monasmith
Senior Project Manager
Systems Assessment & Facility Siting Division
California Energy Commission
1516 Ninth Street, MS-15
Sacramento, CA 95814

Subject: Data Response, Set 2B
Hidden Hills Solar Electric Generating System (11-AFC-2)

Dear Mr. Monasmith:

On behalf of Hidden Hills Solar I, LLC; and Hidden Hills Solar II, LLC, please find attached an electronic copy of Data Response, Set 2B in response to Staff's Data Request Set 2B filed on January 17, 2012.

Hard copies will be sent out today. Please call me if you have any questions.

Sincerely,

CH2M HILL

A handwritten signature in blue ink, reading "John L. Carrier".

John L. Carrier, J.D.
Program Manager

Encl.

c: POS List
Project file

DOCKET

11-AFC-2

DATE FEB 16 2012

RECD. FEB 16 2012

Data Response 2B

Hidden Hills

Solar Electric Generating System

(11-AFC-2)



Application for Certification
Hidden Hills Solar I, LLC; and Hidden Hills Solar II, LLC

February 16, 2012

With Technical Assistance from



Hidden Hills Solar Electric Generating System (HHSEGS)

(11-AFC-2)

**Data Response, Set 2B
(Response to Data Requests 144 through 146)**

Submitted to the
California Energy Commission

Submitted by
**Hidden Hills Solar I, LLC; and
Hidden Hills Solar II, LLC**

February 16, 2012

With Assistance from
CH2MHILL
2485 Natomas Park Drive
Suite 600
Sacramento, CA 95833

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Introduction

Attached are Hidden Hills Solar I, LLC, and Hidden Hills Solar II, LLC (collectively, “Applicant”) responses to the California Energy Commission (CEC) Staff’s data requests numbers 144 through 146 for the Hidden Hills Solar Electric Generating System (HHSEGS) Project (11-AFC-2). The CEC Staff served these data requests on January 17, 2012.

Air Quality (144-146)

BACKGROUND

Applicant expects the maximum emissions from each boiler to occur during the cold start/tuning phase of commissioning, and during other cold startups. While applicant did not model the impact due to commissioning, when comparing the emissions during commissioning (Table 5.1B-18) and those during cold startups (Table 5.1-24 and Table 5.1-25), staff found maximum emissions during different commissioning phases can be higher than those during cold startups. For example, emissions from auxiliary boilers during the full load operation of commissioning are higher than those during cold startups except for NOx which shows as being equivalent.

DATA REQUEST

144. Please explain why modeling is not necessary for commissioning while some of the emissions are higher than those during cold startups.

Response: Additional modeling is not necessary for commissioning because potential impacts from those boilers would not be any higher than the impacts already evaluated for normal operations. Applicant performed separate, specialized modeling analyses only when an operational scenario had not already been considered in the AFC. In the example cited by staff, emissions from auxiliary boilers operated at full load during commissioning are not higher than emissions from the auxiliary boilers operated at full load during normal operations. This is because full load operation of the auxiliary boilers during the commissioning period does not occur until several days of lower load testing/tuning has been completed; thus, the auxiliary boilers are able to achieve normal operating emission levels during full load commissioning activities. Therefore, the impacts from those boilers during that phase of commissioning would not be any higher than the impacts already evaluated for normal operations and presented in Table 5.1-36 of the AFC.

Applicant concurs that the statement in Section 5.1.4.5.11 of the AFC that reads “Maximum emissions from each boiler are expected to occur during the cold start/tuning phase of commissioning...” is not correct as written. While emissions are highest during the cold start/tuning phase on a lb/MMBtu basis, they are not necessarily highest on a lb/hr basis.

DATA REQUEST

145. Please provide additional results for commissioning impact analysis if impact during commissioning is higher than that during cold startups.

Response: As discussed in Response 144, impacts during full load operation of the boilers have already been evaluated in the AFC and additional analysis is not necessary.

BACKGROUND: OPERATIONS EMISSIONS CALCULATIONS DATA REQUEST

Applicant does not include the emissions from mirror washing activities in the total project emissions in Table 5.1-26. Applicant does not include the mirror washing emissions in the operations impact analysis either. Applicant does quantify the emissions from mirror washing activities in Table 5.1-27 and these emissions are not negligible. For example, the annual NOx

emission from mirror washing activities is expected to be 13.7 tons/yr, while it is 12.3 tons/yr from all stationary sources.

DATA REQUEST

146. Please include the emissions from mirror washing activities in the total facility emissions and provide the corresponding impact analysis.

Response: On February 6, 2012, Applicant filed a notice pursuant to Section 1716(f) that additional time would be necessary to respond to this data request given the extensive nature of the modeling requested. A response to this data request will be filed on or before Monday, February 20, 2012.



**BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT
COMMISSION OF THE STATE OF CALIFORNIA
1516 NINTH STREET, SACRAMENTO, CA 95814
1-800-822-6228 – WWW.ENERGY.CA.GOV**

**APPLICATION FOR CERTIFICATION
FOR THE *HIDDEN HILLS SOLAR ELECTRIC
GENERATING SYSTEM***

DOCKET NO. 11-AFC-2

**PROOF OF SERVICE
(Revised 2/1/2012)**

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DECLARATION OF SERVICE

I, Mary Finn, declare that on February 16, 2012, I served and filed copies of the attached Hidden Hills SEGS Data Response, Set 2B dated February 16, 2012. This document is accompanied by the most recent Proof of Service list, located on the web page for this project at: [www.energy.ca.gov/sitingcases/hiddenhills/index.html].

The document has been sent to the other parties in this proceeding (as shown on the Proof of Service list) and to the Commission's Docket Unit or Chief Counsel, as appropriate, in the following manner:

(Check all that Apply)

For service to all other parties:

- x Served electronically to all e-mail addresses on the Proof of Service list;
- x Served by delivering on this date, either personally, or for mailing with the U.S. Postal Service with first-class postage thereon fully prepaid, to the name and address of the person served, for mailing that same day in the ordinary course of business; that the envelope was sealed and placed for collection and mailing on that date to those addresses **NOT** marked "e-mail preferred."

AND

For filing with the Docket Unit at the Energy Commission:

- x by sending an electronic copy to the e-mail address below (preferred method); **OR**
- by depositing an original and 12 paper copies in the mail with the U.S. Postal Service with first class postage thereon fully prepaid, as follows:

CALIFORNIA ENERGY COMMISSION – DOCKET UNIT

Attn: Docket No. 11-AFC-2
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512
docket@energy.state.ca.us

OR, if filing a Petition for Reconsideration of Decision or Order pursuant to Title 20, § 1720:

- Served by delivering on this date one electronic copy by e-mail, and an original paper copy to the Chief Counsel at the following address, either personally, or for mailing with the U.S. Postal Service with first class postage thereon fully prepaid:

California Energy Commission
Michael J. Levy, Chief Counsel
1516 Ninth Street MS-14
Sacramento, CA 95814
mlevy@energy.state.ca.us

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, that I am employed in the county where this mailing occurred, and that I am over the age of 18 years and not a party to the proceeding.



Mary Finn
CH2M Hill