



San Diego Chapter

Serving the Environment in San Diego and Imperial Counties



December 14, 2012

C. Richard "Rick" Neff, Vice President
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9405 Arrowpoint Boulevard
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**RE: Quail Brush Generation Project (11-AFC-03), Data Requests 1-5 of
Intervenor Sierra Club, San Diego Chapter**

Pursuant to the provisions of Title 20, California Code of Regulations, Section 1716, Sierra Club San Diego Chapter, hereby submits the enclosed Data Requests, numbered 1 through 5. The information requested is required to understand the Project's need, as purported by the applicant, and the plans for pipeline maintenance and safety.

If you are unable to provide the requested information, or object to providing the information, please send notification to the Committee and us within 20 days receipt of this notice. Please provide reasons or justifications for not providing the information.

If you have any questions regarding the Data Request, please contact me at 858-569-6005.

Sincerely,

/s/ Pete Hasapopoulos

Pete Hasapopoulos

Enclosure: (Data Request Packet)
cc: Docket (11-AFC-3)

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(11-AFC-3) Quail Brush Generation Project

DATA REQUESTS 1-5

Intervenor
Sierra Club, San Diego Chapter

December 14, 2012

Background for Data Request:

On page 3 of its appeal of the San Diego Planning Commission’s General Plan amendment denial, Cogentrix states the following: “As explained by the California Independent System Operator (“CAISO”), San Diego is a ‘local capacity area’ or ‘a geographic area that does not have sufficient transmission import capability to serve the customer demand in the area without the operation of generation located within that area, and there must be sufficient generation in the local area available to grid operators to serve the load in times of stressed conditions.’ (CAISO July 13, 2012 Opening Brief submitted in California Public Utilities Commission (CPUC) Docket A.11-05-023, p. 5). This means that a certain amount of generation facilities must be located in the San Diego area to supply energy for the local growing population. Without such facilities, individuals and businesses will suffer damaging brownouts and blackouts during times of peak energy demand. This risk is especially acute now due to the anticipated shut down of the Encina Power Station in Carlsbad, the indefinite suspension of the San Onofre Nuclear Generating Station, and the roll out of new intermittent renewable energy generation facilities. Accordingly, the need to procure flexible generation in the San Diego area is both real and urgent.”

San Diego Gas & Electric applied to the California Public Utilities Commission (CPUC) for authority to enter into purchase power tolling agreements with Escondido Energy Center, Pio Pico Energy Center and Quail Brush Power (Application 11-05-023.) The CPUC administrative law judge and, Commissioner Ferron in an alternate proposed decision, denied authority for Pio Pico and Quail Brush, with the administrative law judge also denying it for Escondido Energy Center.

Commissioner Ferron’s findings of fact included the following: (1) “There is no LCR need until 2018 under any scenario or forecast in the record of this proceeding, and then only if the Encina OTC units retire,” (2) The “CAISO’s OTC study did not model forecasted additions of uncommitted energy efficiency or demand response, or incremental CHP,” and (3) “There is no record evidence of the impact of a prolonged SONGS outage on SDG&E’s LCR need.”

Data Requests:

1. If you do not agree with the proposed decisions of the CPUC administrative law judge and Commissioner Ferron with respect to local capacity requirement, please explain how their decisions are flawed.
2. With respect to your statement about the “anticipated shut down” of the Encina Power Station, what is your evidence that this will most certainly happen?

Background for Data Request:

Natural gas has highly explosive potential. Two natural gas pipeline explosions have taken place this month alone, the most recent destroying homes and charring a section of I-77 in West Virginia. Columbia Gas has acknowledged in its federal regulatory filings that it owns 1,070 miles of "high risk" pipeline. (<http://www.dailymail.com/News/201212120281>) There have been more than a dozen pipeline explosions in the US in 2012. The second law of thermodynamics, often referred to as the law of "entropy" or "disorder" indicates that at some point a gas pipeline will deteriorate to the point where the energy inside reaches a highly destructive potential.

Data Requests:

3. Considering the recent history of gas line explosions and the law of entropy, when would the gas lines both on site and within one mile of the plant off-site need replacement?
4. For the same gas pipelines listed above, what is the inspection and maintenance schedule and what specific actions will be scheduled? Please separate the on and offsite estimates.
5. For the same gas pipelines listed above, what is the range of estimated costs to maintain and or eventually replace the pipeline system over its lifetime? Please separate the on and offsite estimates.

DECLARATION OF SERVICE

I, Pete Hasapopoulos, declare that on December 14, 2012, I served and filed a copies of the attached Data Requests dated December 14, 2012. This document is accompanied by the most recent Proof of Service list, located on the web page for this project at: <http://www.energy.ca.gov/sitingcases/quailbrush/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:

- Served electronically to all e-mail addresses on the Proof of Service list;
- 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 marked **“hard copy required”** or where no e-mail address is provided.

AND

For filing with the Docket Unit at the Energy Commission:

- 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-03
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512
docket@energy.ca.gov

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
michael.levy@energy.ca.gov

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.

/s/ Pete Hasapopoulos



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
QUAIL BRUSH GENERATION PROJECT**

DOCKET NO. 11-AFC-03
PROOF OF SERVICE
(Revised 11/19/2012)

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