

DOCKET

11-AFC-3

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March 15, 2012

Mr. Eric Solorio
California Energy Commission
Docket No. 11-AFC-3
1516 9th St.
Sacramento, CA 95814

Cogentrix Quail Brush Generation Project - Docket Number 11-AFC-3, Quail Brush Generation Project Status Report

Docket Clerk:

Pursuant to the provisions of Title 20, California Code of Regulation, and on behalf of Quail Brush Genco, LLC, a wholly owned subsidiary of Cogentrix Energy, LLC, Tetra Tech hereby submits the memo titled *Quail Brush Generation Project Status Report*. The Quail Brush Generation Project is a 100 megawatt natural gas fired electric generation peaking facility to be located in the City of San Diego, California.

This memo was prepared per the Committee Scheduling Order for the Quail Brush Generation Project, monthly status reports will be prepared to inform the Committee whether or not case development is progressing satisfactorily, and bring potential schedule delays and other relevant matters to the Committee's attention.

If you have any questions regarding this submittal, please contact Rick Neff at (704) 525-3800 or me at (303) 980-3653.

Sincerely,



Constance E. Farmer
Project Manager/Tetra Tech

cc: Lori Ziebart, Cogentrix
John Collins, Cogentrix
Rick Neff, Cogentrix
Proof of Service List



Memorandum

To: Commissioner Karen Douglas, Presiding Member
Commissioner Carla Peterman, Associate Member
From: Connie Farmer, Tetra Tech EC, Inc. on behalf of Quail Brush Genco, LLC
Date: March 15, 2012
Subject: Quail Brush Generation Project Status Report (Docket No. 11-AFC-03)

Per the Committee Scheduling Order for the Quail Brush Generation Project (Project), monthly status reports will be prepared to inform the Committee whether or not case development is progressing satisfactorily, and bring potential schedule delays and other relevant matters to the Committee's attention. This status report is the first status report for the Project, and includes a discussion of Project milestones, updates regarding requested extensions, and potential Project schedule delays to date. I have reviewed this status report with Eric Solorio, California Energy Commission (CEC) Project Manager. Eric Solorio will provide the Commissioners with a separate status report from CEC staff.

Quail Brush Project Milestones:

The Applicant's Project milestones to date include:

1. The AFC was docketed on August 28, 2011.
2. The Application for Confidential Cultural Resources Data was docketed on August 28, 2011.
3. The California Independent System Operator "CIC2 Projects Phase II Appendix A - C565 Individual Project Report" was docketed on October 13, 2011.
4. The Supplement to the AFC was docketed on October 24, 2011.
5. The Application for Confidential Cultural Resources Data and Application for Confidential Paleontological Resources Data were docketed on October 24, 2011.
6. The San Diego County Air Pollution Control District's Completeness Determination for the Quail Brush Application for Authorities to Construction/Permits to Operate was docketed on November 4, 2011.
7. The Revised Supplemental Survey Design was docketed on November 7, 2011.

8. The Site Specific Final Report - Ordinance and Explosives Removal Actions, Former Camp Elliott, East Elliott - Sector 2, San Diego, California (J09CA006703), July 22, 2006, was docketed on November 16, 2011.
9. The Applicant's Action Item Response Memo was docketed on January 23, 2012.
10. Supplement 2 to the AFC was docketed on February 8, 2012.
11. The Application for Confidential Preliminary Supplemental Cultural Resources Report was docketed on February 16, 2012.
12. The 20-day letter for the responses to CEC Data Request Round 1 was docketed on February 27, 2012.
13. The Vertical Velocity Plume Assessment was docketed on March 7, 2012.
14. The responses to CEC Data Request Round 1 were docketed on March 8, 2012.
15. The Response to Questions on Quail Brush Traffic Study was docketed on March 8, 2012.

Update Regarding Quail Brush Project Extensions:

As described in the initial response to Staff's data requests, 1 through 58, docketed on February 27, 2012, Quail Brush requested additional time to respond to 17 of the staff's data requests and identified specific dates by which most of the information would be provided. Since docketing that letter, some of these dates have been updated. The following list of data responses provide anticipated submittal dates, noting those that have been updated since the filing of the 20-day letter:

- Data request 2: Tabulated list showing expected emissions and Emission Reduction Credits. Quail Brush expects to be able to provide ERC, mitigation information and any updated table of expected emissions by May 15, 2012.
- Data request 3: Proposed CEQA mitigation for non-attainment pollutants and precursor emissions. Quail Brush expects to be able to provide this information by May 15, 2012.
- Data request 16: List of appropriate projects from APCD to be included in the cumulative modeling analysis. Because production of this list is dependent on the SCAPCD, Quail Brush is uncertain when we will be able to provide the list to the CEC. Quail Brush will provide the CEC with updates of the status of this list when further information becomes available.

- Data request 17: Cumulative modeling analysis. As discussed in data request 16, Quail Brush is waiting for the cumulative projects list to be finalized. Once the list is finalized, the modeling will take two to four weeks to complete the CEC cumulative analysis, at which time Quail Brush will docket the analysis with the CEC.
- Data request 18: Re-model the worst-case 24-hour PM10/PM2.5 impacts. As anticipated in the 20 day letter, Quail Brush air staff and the CEC air staff held a technical discussion to discuss what had been previously submitted and identify if there were any information gaps. Pursuant to the technical discussion on February 28, 2012, it was determined that no re-modeling is required and therefore, nothing further will be submitted in response to this data request.
- Data request 22: Total amount of nitrogen deposition. Quail Brush expects to be able to provide the initial plot on or before April 15, 2012. This is earlier than was anticipated in the 20-day letter.
- Data request 23: Isopleths graphic over USG 7.5 minute maps. Quail Brush expects to be able to provide the initial plot on or before April 15, 2012. This is earlier than was anticipated in the 20-day letter.
- Data request 24: Cumulative impact analysis of the nitrogen deposition values. Quail Brush expects to be able to provide the initial plot on or before April 15, 2012. At the time of submitting the 20-day letter, the submittal date was unknown. The cumulative deposition analysis will be prepared after the cumulative emissions inventory is finalized by the San Diego APCD. This is expected to be completed by the end of April. Once the inventory is finalized, we will work with the CEC to determine which background sources will need to be included in the cumulative analysis. We expect this to be completed by mid-May 2012.
- Data request 25: Potential mitigation strategies to decrease cumulative nitrogen deposition impacts. After the analysis referenced in our response to Data Request #24 is completed, Quail Brush will be able to provide mitigation strategies for potential nitrogen deposition impacts. Quail Brush will provide the CEC with updates as further information becomes available.
- Data request 27: Final determination from the USACE regarding jurisdiction. If the USACE decides that a formal determination is required, Quail Brush will docket it with the CEC as soon as it is provided by USACE. If a formal determination is not required, Quail Brush will submit documentation from the USACE regarding this decision.
- Data request 29: Quino checkerspot butterfly protocol surveys. The report of findings will be prepared no earlier than May 6, 2012 and no later than May 31, 2012. The

proposed schedule is consistent with that included in the 20-day letter, which anticipated submittal of the survey results on May 15, 2012.

- Data request 30: Map depicting locations of any host plants, Quino checkerspot butterfly adults and larvae found during surveys. The appropriate graphics will be included as part of the report of findings mentioned above in Data Response #29 and will be submitted simultaneously. The proposed schedule is consistent with that included in the 20-day letter, which anticipated submittal of the surveys results on May 15, 2012.
- Data request 37: Finalization of the proposed location of the five-acre laydown and parking area. As discussed in the 20-day letter, Quail Brush asks the CEC Staff to analyze Quail Brush's usage of any 5 acres within the designated 20-acre site. Quail Brush does not anticipate submitting anything further in response to this data request.
- Data request 38: Copies of the application materials submitted to the City of San Diego for CUP and SDP review. After the March 15, 2012 City of San Diego Planning Commission hearing, Quail Brush will submit the application package to the City and provide copies of to the CEC.
- Data request 40: Conceptual hydromodification plan that will satisfy the City of San Diego's requirements. Following receipt of the City's approval to proceed with the amendment process, we expect to receive the necessary confirmation from the City and respond to this data request.
- Data request 43: Updated information regarding the development status of the Sycamore Landfill Expansion project. Quail Brush will be unable to provide information regarding status of the Sycamore Landfill's project on March 8, 2012 as we are not involved with this project and we are unaware of any information that has been made available to the public.
- Data request 58. Conversation with SDFRD confirming absence or mitigation of any expected impacts on the local fire district. Quail Brush met with the City of Santee Fire and Rescue Department on March 7, 2012 to discuss potential impacts on the local fire district. As these discussions will continue, Quail Brush will provide the CEC with updates.

Potential Project Schedule Delays:

The Committee Scheduling Order for the Project included a request to bring potential schedule delays to the Committee's attention. A list of issues that may result in schedule delays and the rationale for these potential delays is listed below.

1. Biological resources technical report. The biological resources technical report cannot be docketed until all surveys are completed. The late spring plant survey will initiate in mid-May and field work will be completed the first week of June. A technical conference call with CEC biological resources staff and Tetra Tech biological resources staff was held on March 9, 2012 and this issue was discussed during this call. The conference call participants agreed that the biological resources technical report submittal date to the CEC will be the end of June.

2. Conceptual hydromodification plan. The CEC staff has requested that Quail Brush submit a hydromodification plan. It is not possible for Quail Brush to provide a design level hydromodification plan at this time because: (1) input is needed from City staff and Quail Brush has been informed that the City staff cannot fully engage in Project review until the Planning Commission approves the request for initiation of the Community Plan Amendment process; and (2) the Project is still at a conceptual design level and the storm water drainage system can not be completed until the final layout for the power plant is completed. A technical conference call between CEC hydrology staff and Tetra Tech hydrology staff was held on February 15, 2012 to discuss how to address this issue. The conclusions from this call are as follows
 - a. Tetra Tech will provide more details about the storm water control measures (both Best Management Practices [BMPs] and Low Impact Development [LID] features).
 - b. Additional information about the drainage within the footprint of the plant site area will be provided. Written details about the controls will be expanded to provide additional support regarding the how the storm water controls will be designed and finalized in the detailed project design.
 - c. The goal is to separate the clean storm water entering the site (run-on) from the run-off from the plant to minimize the quantities to be controlled.
 - d. Additional details about the onsite pre- and post-construction storm water flows and controls will be added to the design and documented in a revised evaluation.
 - e. If possible, the City's BMP Sizing Calculator will be used for those portions of the Project that fall within the plant site footprint.

The conceptual hydromodification plan will be complete in mid-May 2012.



**BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT
COMMISSION OF THE STATE OF CALIFORNIA
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**APPLICATION FOR CERTIFICATION
FOR THE *QUAIL BRUSH GENERATION PROJECT***

**DOCKET NO. 11-AFC-3
PROOF OF SERVICE
(Revised 2/29/2012)**

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*indicates change

DECLARATION OF SERVICE

I, Constance Farmer, declare that on March 15, 2012, I served and filed a copy of the Cogentrix Quail Brush Generation Project (11-AFC-3) Status Report. This document is accompanied by the most recent Proof of Service list, located on the web page for this project at: [\[http://www.energy.ca.gov/sitingcases/quailbrush/index.html\]](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:

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- by sending an electronic copy to the e-mail address below (preferred method); **OR**
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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:

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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.

