



TETRA TECH EC, INC.

DOCKET

11-AFC-3

DATE MAY 10 2012

RECD. MAY 10 2012

May 10, 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, Cumulative Impact Analysis for the Quail Brush Power Project

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 Cumulative Impact Analysis for the Quail Brush Power Project. 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.

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

May 10, 2012

Mr. Joseph Hughes, Air Resources Engineer
California Energy Commission
1516 Ninth Street, MS-40
Sacramento, CA. 95814

Re: Cumulative Impact Analysis for the Quail Brush Power Project (11-AFC-3)

Dear Mr. Hughes:

Pursuant to CEC staff's Data Requests, 1 through 58, dated 2-7-12, specifically data request #17 which requests the required cumulative impact analysis, Aerowest is submitting the following, on behalf of Quail Brush Genco LLC, for your review.

Background

The AFC for the Quail Brush Power project was submitted to the CEC in August of 2011. The CEC deemed the air quality analysis portion of the AFC "data adequate" on 11-8-11. The San Diego APCD deemed the air quality application for the project "complete" on 11-2-11. The first set of CEC Data Requests (as noted above), was received in early February 2012.

Cumulative Source List Derivation

In anticipation of the cumulative impact analysis, the Applicant made a formal written request to the San Diego APCD for a list of sources within an 8 mile radius of the proposed plant site that met the criteria as established in the modeling protocol (presented in Appendix F.3 of the AFC), as well as the criteria delineated in Appendix F.8 (with inclusion dates modified by the updated background air quality values of 4-2-12). The CEC cumulative analysis requires a 6 mile radius search. Our request for an 8 mile search was to provide search results at a slightly greater distance in order to identify any applicable sources which may lie in very close proximity to the 6 mile radius boundary.

The list of sources, as provided by the San Diego APCD was reviewed and forwarded to the CEC on 4-6-12 along with a discussion of our basic assumptions for deleting non-applicable sources. Sources were then eliminated from the list based on the following criteria: (please see Table 1 attached)

1. Any source which was in operation during the period 2008 through 2010 was eliminated from the target source list, as such sources' emissions would be included in the background air quality values for the years 2009-2011 (as updated on 4-2-12). These sources are identified on Table 1 in "blue" highlight. Sources identified as beginning operations in 2011 were kept on the list, as emissions from these sources may not be fully accounted for in the background values. Some of these sources may be eliminated per the following criteria.
2. Past CEC policy indicates that emergency standby engines are not required to be included in the cumulative analysis. As such, the emergency standby engines noted on the APCD source list were eliminated from consideration. These sources are identified on Table 1 in "yellow" highlight. CEC staff indicated verbally to QBPP air staff that any large emergency standby

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engine that was close to the site should be included in the analysis. QBPP air staff plotted the locations of the various engines, and noted that the closest engine was over 3 miles from the proposed site, and as such, this engine was not included in the analysis.

3. Sources which clearly lie outside of the required CEC 6 mile radius were also eliminated from the analysis. These sources are identified in Table 1 in “green” highlight.
4. In addition, the list contained four sources, i.e., the turbines located on Campanile Dr., which are replacement units permitted by the APCD, which showed no net increase in emissions, and as such, these units were also eliminated from the list because the existing facility emissions were already accounted for in the background air quality values. These sources are also identified in Table 1 in “green” highlight.

As a clarification, it should be noted that many of the sources on the APCD list can be eliminated from consideration in the cumulative analysis due to more than one of the criteria noted above.

Conclusion

Based on the source list provided by the San Diego APCD, and the criteria noted above, no applicable sources were identified for inclusion in an analysis of cumulative impacts for the Quail Brush Power Plant project within the required 6 mile radius area.

Please feel free to contact me at (530) 474-1893, or by email at altitude3000@gmail.com if you have any questions concerning this submittal.

Respectfully,

Richard B. Booth

Richard B. Booth, Sr. AQ Consultant
AEROWEST

Attachment(s): Table 1

cc: file

Table 1 Cumulative Source Listing (8 mile radius, supplied by SDAPCD)

RECORD_ID	APPROVE_ATC	ISSUE_ATC	CONSTR_COMPLETE_NOTICE	FEE_SCH AND SOURCE_CATALOGY	EQUIP_ADDRESS	ZIP	Coors, X	Coors, Y
APCD2008-APP-986117	Yes	Yes	Yes	34h - Emer standby engine	12370 Kerran Street,Poway,CA	92064	-117.055668	32.939618
APCD2008-APP-986344	Yes	Yes	Yes	34h - Emer standby engine	9431 Dowdy Dr,San Diego,CA	92126	-117.146778	32.892312
APCD2008-APP-986406	Yes	Yes	Yes	34h - Emer standby engine	6255 MISSION GORGE RD,SAN DIEGO,CA	92120	-117.097657	32.788262
APCD2008-APP-986624	Yes	Yes	Yes	07A - rock crusher	8514 MAST BL,SANTEE,CA	92071	-117.019703	32.848674
APCD2008-APP-987491	Yes	Yes	Yes	34A - cogen engine	8514 Mast Blvd,Santee,CA	92071	-117.019703	32.848674
APCD2009-APP-000803	Yes	Yes	Yes	34h - Emer standby engine	14170 Kirkham Way,Poway,CA	92064	-117.020326	32.93719
APCD2009-APP-000848	Yes	Yes	Yes	34h - Emer standby engine	9343 Wheatlands Rd,Santee,CA	92071	-116.960747	32.84552
APCD2009-APP-000881	Yes	Yes	Yes	34h - Emer standby engine	12910 Camino del Valle,Poway,CA	92064	-117.05328	33.013935
APCD2009-APP-000883	Yes	Yes	Yes	34h - Emer standby engine	14415 Lake Poway Rd,Poway,CA	92064	-117.023253	33.007298
APCD2009-APP-000884	Yes	Yes	Yes	34h - Emer standby engine	14090 North Ln,Poway,CA	92064	-117.010105	32.977762
APCD2009-APP-987936	Yes	Yes	Yes	34h - Emer standby engine	1150 West Bradley Ave,El Cajon,CA	92020	-116.977361	32.816858
APCD2009-APP-987936	Yes	Yes	Yes	34h - Emer standby engine	1150 West Bradley Ave,El Cajon,CA	92020	-116.977361	32.816858
APCD2009-APP-988099	Yes	Yes	Yes	34C,34H - emer standby engine	12344 SEMILLON BLVD,SAN DIEGO,CA	92131	-117.066399	32.911881
APCD2009-APP-988099	Yes	Yes	Yes	34C,34H - emer standby engine	12344 SEMILLON BL,SAN DIEGO,CA	92131	-117.066399	32.911881
APCD2009-APP-988155	Yes	Yes	Yes	27A - marine coating application <10 tpy VOC	15405 OLD HY 80,EL CAJON,CA	92021	-116.841083	32.855784
APCD2009-APP-989238	Yes	Yes	Yes	34h - Emer standby engine	8917 Complex Drive,San Diego,CA	92123	-117.136471	32.829931
APCD2009-APP-989238	Yes	Yes	Yes	34h - Emer standby engine	8917 Complex Drive,San Diego,CA	92123	-117.136471	32.829931
APCD2010-APP-000936	Yes	Yes	Yes	34h - Emer standby engine	9305 Lightwave Ave,San Diego,CA	92123	-117.129781	32.829163
APCD2010-APP-000937	Yes	Yes	Yes	34h - Emer standby engine	9305 Lightwave Ave,San Diego,CA	92123	-117.129781	32.829163
APCD2010-APP-000938	Yes	Yes	Yes	34h - Emer standby engine	9305 Lightwave Ave,San Diego,CA	92123	-117.129781	32.829163
APCD2010-APP-000939	Yes	Yes	Yes	34h - Emer standby engine	9305 Lightwave Ave,San Diego,CA	92123	-117.129781	32.829163
APCD2010-APP-000940	Yes	Yes	Yes	34h - Emer standby engine	9305 Lightwave Ave,San Diego,CA	92123	-117.129781	32.829163
APCD2010-APP-000941	Yes	Yes	Yes	34h - Emer standby engine	9305 Lightwave Ave,San Diego,CA	92123	-117.129781	32.829163
APCD2010-APP-000942	Yes	Yes	Yes	34h - Emer standby engine	9305 Lightwave Ave,San Diego,CA	92123	-117.129781	32.829163
APCD2010-APP-000943	Yes	Yes	Yes	34h - Emer standby engine	9305 Lightwave Ave,San Diego,CA	92123	-117.129781	32.829163
APCD2010-APP-000950	Yes	Yes	Yes	34h - Emer standby engine	8939 Complex Dr,San Diego,CA	92123	-117.136107	32.829966
APCD2010-APP-000970	Yes	Yes	Yes	20g - turbine/peaker	800 W Main St,El Cajon,CA	92020	-116.972221	32.795019
APCD2010-APP-000971	Yes	Yes	Yes	20g - turbine/peaker	5459 Complex St,San Diego,CA	92123	-117.134549	32.833732
APCD2010-APP-000972	Yes	Yes	Yes	20g - turbine/peaker	5459 Complex St,San Diego,CA	92123	-117.134549	32.833732
APCD2010-APP-000973	Yes	Yes	Yes	20g - turbine/peaker	5459 Complex St,San Diego,CA	92123	-117.134549	32.833732
APCD2010-APP-000974	Yes	Yes	Yes	20g - turbine/peaker	5459 Complex St,San Diego,CA	92123	-117.134549	32.833732
APCD2010-APP-000975	Yes	Yes	Yes	20g - turbine/peaker	5460 Overland Ave,San Diego,Ca	92123	-117.131062	32.833335
APCD2010-APP-000977	Yes	Yes	Yes	20g - turbine/peaker	5459 Complex St,San Diego,CA	92123	-117.134549	32.833732
APCD2010-APP-000978	Yes	Yes	Yes	20g - turbine/peaker	5459 Complex St,San Diego,CA	92123	-117.134549	32.833732
APCD2010-APP-000979	Yes	Yes	Yes	20g - turbine/peaker	5459 Complex St,San Diego,CA	92123	-117.134549	32.833732
APCD2010-APP-000985	Yes	Yes	Yes	34h - Emer standby engine	14200 Kirkham Way,Poway,Ca	92064	-117.046227	32.934981
APCD2010-APP-000989	Yes	Yes	Yes	34h - Emer standby engine	5555 Overland Ave, Bldg 2 MS 0366,San Diego,CA	92123	-117.130644	32.833893

APCD2010-APP-001026	Yes	Yes	Yes	34h - Emer standby engine	9970 Carroll Canyon Rd,San Diego,Ca	92131	-117.113474	32.903598
APCD2010-APP-001031	Yes	Yes	Yes	34h - Emer standby engine	100 Civic Center Wy,El Cajon,CA	92020	-116.962358	32.7964
APCD2010-APP-001163	Yes	Yes	Yes	34h - Emer standby engine	9885 Carroll Canyon Rd,San Diego,CA	92131	-117.114447	32.903434
APCD2010-APP-001219	Yes	Yes	Yes	34h - Emer standby engine	2351 Cardinal Ln,San Diego,CA	92123	-117.16001	32.787421
APCD2010-APP-001224	Yes	Yes	Yes	34h - Emer standby engine	46141 Miramar Way,San Diego,Ca	92145	-117.128664	32.883713
APCD2010-APP-001229	Yes	Yes	Yes	34h - Emer standby engine	4647 Zion Av,San Diego,CA	92120	-117.09401	32.792943
APCD2010-APP-001232	Yes	Yes	Yes	8a - Concrete Batch Plant	12494 Hwy 67,Lakeside,CA	92040	-116.941677	32.906017
APCD2010-APP-001250	Yes	Yes	Yes	7a - rock crusher	12393 1/4 Moreno Avenue,Lakeside,CA	92040	-116.930362	32.902144
APCD2010-APP-001446	Yes	Yes	Yes	34h - Emer standby engine	1068 Broadway,El Cajon,CA	92020	-116.94585	32.807728
APCD2010-APP-001476	Yes	Yes	Yes	34h - Emer standby engine	5795 Kearney Villa Rd,San Diego,CA	92123	-117.133751	32.838745
APCD2010-APP-001477	Yes	Yes	Yes	34h - Emer standby engine	5795 Kearney Villa Rd,San Diego,CA	92123	-117.133751	32.838745
APCD2011-APP-001548	Yes	Yes	Yes	34h - Emer standby engine	14218 1/2 High Valley Rd,Poway,CA	92064	-117.023959	32.989491
APCD2011-APP-001550	Yes	Yes	Yes	34h - Emer standby engine	510 E Washington,El Cajon,CA	92020	-116.95624	32.787688
APCD2011-APP-001620	Yes	Yes	Yes	34h - Emer standby engine	750 E Main St,El Cajon,CA	92021	-116.953588	32.795019
APCD2011-APP-001622	Yes	Yes	Yes	34h - Emer standby engine	12216 Lakeside Ave,Lakeside,CA	92040	-116.928615	32.866495
APCD2011-APP-001631	Yes	Yes	Yes	34h - Emer standby engine	14710 Valley View Road,Poway,CA	92064	-117.010724	33.036794
APCD2011-APP-001632	Yes	Yes	Yes	34h - Emer standby engine	18130 Sunset Point Road,Poway,CA	92064	-117.010105	32.977762
APCD2011-APP-001847	Yes	Yes	Yes	34h - Emer standby engine	4560 Viewridge Avenue,San Diego,CA	92123	-117.123468	32.823867
APCD2011-APP-001907	Yes	Yes	Yes	34h - Emer standby engine	4600 Belleau Av Bldg 226,San Diego,CA	92040	-117.185343	32.739346
APCD2011-APP-001916	Yes	Yes	Yes	20e - turbine, stationary, 50-250 mmbtu/hr	5500 CAMPANILE DRIVE,SAN DIEGO,CA	92182	-117.071968	32.772321
APCD2011-APP-001916	Yes	Yes	Yes	20e - turbine, stationary, 50-250 mmbtu/hr	5500 Campanile Dr,San Diego,CA	92182	-117.071968	32.772321
APCD2011-APP-001917	Yes	Yes	Yes	20e - turbine, stationary, 50-250 mmbtu/hr	5500 CAMPANILE DRIVE,SAN DIEGO,CA	92182	-117.071968	32.772321
APCD2011-APP-001917	Yes	Yes	Yes	20e - turbine, stationary, 50-250 mmbtu/hr	5500 Campanile Dr,San Diego,CA	92182	-117.071968	32.772321
APCD2011-APP-001919	Yes	Yes	Yes	34h - Emer standby engine	8844 Dallas St,La Mesa,CA	91942	-117.006485	32.790973
APCD2008-APP-987499	Yes	Yes	Reissue AC	8a - Concrete Batch Plant	10051 BLACK MOUNTAIN RD,SAN DIEGO,CA	92126	-117.123522	32.90075
APCD2008-APP-987499	Yes	Yes	Reissue AC	8a - Concrete Batch Plant	10051 BLACK MOUNTAIN RD,SAN DIEGO,CA	92126	-117.123522	32.90075
APCD2009-APP-000809	Yes	n/a	Pending	34h - Emer standby engine	15615 Pomerado Road,Poway,CA	92064	-117.05788	32.995803
APCD2010-APP-001333	Yes	Yes	Pending	34h - Emer standby engine	9305 Lightwave Ave,San Diego,CA	92123	-117.129781	32.829163
APCD2010-APP-001334	Yes	Yes	Pending	34h - Emer standby engine	9305 Lightwave Ave,San Diego,CA	92123	-117.129781	32.829163
APCD2010-APP-001335	Yes	Yes	Pending	34h - Emer standby engine	9305 Lightwave Ave,San Diego,CA	92123	-117.129781	32.829163
APCD2010-APP-001336	Yes	Yes	Pending	34h - Emer standby engine	9305 Lightwave Ave,San Diego,CA	92123	-117.129781	32.829163
APCD2010-APP-001337	Yes	Yes	Pending	34h - Emer standby engine	9305 Lightwave Ave,San Diego,CA	92123	-117.129781	32.829163
APCD2010-APP-001338	Yes	Yes	Pending	34h - Emer standby engine	9305 Lightwave Ave,San Diego,CA	92123	-117.129781	32.829163
APCD2010-APP-001339	Yes	Yes	Pending	34h - Emer standby engine	9305 Lightwave Ave,San Diego,CA	92123	-117.129781	32.829163
APCD2010-APP-001340	Yes	Yes	Reissue AC	34h - Emer standby engine	9305 Lightwave Ave,San Diego,CA	92123	-117.129781	32.829163
APCD2011-APP-001634	Yes	Yes	Pending	34A - cogen engine	8611 Balboa Av,San Diego,CA	92123	-117.142291	32.820804
APCD2011-APP-001635	Yes	Yes	Pending	34A - cogen engine	8611 Balboa Av,San Diego,CA	92123	-117.142291	32.820804
APCD2011-APP-001744	Yes	Yes	Pending	34h - Emer standby engine	655 Park Center Dr,Santee,Ca	92071	-116.975739	32.851652
APCD2011-APP-001744	Yes	Yes	Pending	34h - Emer standby engine	655 Park Center Dr,Santee,CA	92071	-116.975739	32.851652



**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 5/9/2012)

APPLICANT

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**ENERGY COMMISSION –
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**ENERGY COMMISSION –
PUBLIC ADVISER**

Jennifer Jennings
Public Adviser's Office
e-mail service preferred
PublicAdviser@energy.ca.gov

DECLARATION OF SERVICE

I, Constance Farmer, declare that on May 10, 2012, I served and filed a copy of the Cumulative Impact Analysis for the Quail Brush Power Project. 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:

- 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 **NOT** marked "e-mail preferred."

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-3

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.



CALIFORNIA ENERGY COMMISSION

1516 NINTH STREET
SACRAMENTO, CA 95814-5512
www.energy.ca.gov



TO: *All Parties*

Date: May 9, 2012

RE: **QUAIL BRUSH GENERATION PROJECT**

Proof of Service List

Docket No. 11-AFC-03

Attached is the ***newly revised*** Proof of Service List for the above-mentioned project, current as of May 9, 2012.

Energy Commission regulations (Cal. Code Regs., tit. 20, § 1210) require, in addition to any electronic service, that a paper copy be served in person or by first class mail except where a party requests to receive an electronic copy when one is available. Individuals and groups on the Proof of Service list who prefer to receive filings by e-mail and do not require a paper copy shall inform the Hearing Adviser assigned to the proceeding.

The Proof of Service list for this matter will delineate those individuals and groups and it is sufficient to serve those individuals with an e-mailed copy only. Those not so delineated must be served with a paper copy in addition to any e-mailed copy that the filing party chooses to provide. Signatures may be indicated on the electronic copy by "***Original Signed By***" or similar words.

Unless otherwise specified in a regulation, all materials filed with the Commission must also be filed with the Docket Unit. (Cal. Code Regs., tit. 20, § 1209(d).) Some regulations require filing with the Commission's Chief Counsel instead of the Docket Unit. For example, Section 1720 requires a petition for reconsideration to be filed with the Chief Counsel and served on the parties. Service on the attorney representing Commission staff does not satisfy this requirement. This Proof of Service form is not appropriate for use when filing a document with the Chief Counsel under Title 20, sections 1231 (Complaint and Request for Investigation) or 2506 (Petition for Inspection or Copying of Confidential Records). The Public Advisor can answer any questions related to filing under these sections.

New addition(s) to the Proof of Service are indicated in **bold font** and marked with an asterisk (*). Additionally, if two or more persons are listed on a Proof of Service List with a single address, only one physical copy of a document need be mailed to the address.

Use this newly revised list for all future filings and submittals. This Proof of Service List will also be available on the Commission's Project Web Site at:

<http://www.energy.ca.gov/sitingcases/quailbrush/index.html>

Please review the information and contact me at maggie.read@energy.ca.gov or (916) 654-3893, if you would like to be removed from the Proof of Service or if there are any changes to your contact information.

Maggie Read
Hearing Adviser's Office