

October 29, 2012

C. Richard "Rick" Neff, Vice President
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RE: Quail Brush Generation Project (11-AFC-03), Data Requests 1-17 (Set One) of Intervenors Preserve Wild Santee and Center for Biological Diversity

Pursuant to the provisions of Title 20, California Code of Regulations, Section 1716, Preserve Wild Santee and the Center for Biological Diversity, hereby submits the enclosed Data Requests, numbered 1 through 17. The information requested is required to understand the Project's potential impacts to biological resources, human health, 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 (619) 258-7929.

Sincerely,



Van Collinsworth
Resource Analyst/Executive Director
Preserve Wild Santee

Aruna Prabhala
John Buse
Center for Biological Diversity
351 California St., Suite 600
San Francisco, CA 94104

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

PRESERVE WILD SANTEE
and
CENTER FOR BIOLOGICAL
DIVERSITY, Intervenors

DATA REQUESTS 1- 17 (Set One)
(11-AFC-3) Quail Brush Generation
Project

October 29, 2012

Background for Data Requests:

The proposed Project is to be sited on steep topography surrounded by wildland fuels within a state designated "Very High Fire Severity Zone." The site is within a major contiguous fuel, east-west Santa Ana wind impacted fire corridor. The Project proposes to utilize highly explosive fuel and industrial materials within ½-mile of homes and other sensitive receptors where fires may either originate from or impact the Project site. Fires originating from or impacting the site may result in the loss of life and property as demonstrated in the 2003 Cedar Fire.

Furthermore, City of San Diego fire resources are located at a distance where emergency response times are likely to be well outside of response standards or effectiveness.

Data Requests:

1. In a wind-driven wildfire, please describe the specific tasks and the amount of time required per task for "shutdown and de-energizing of the power plant...to protect human health, the electrical grid and the environment."
2. What "shutdown and de-energizing" procedures would take place in sequence and what procedures are simultaneous?
3. What procedures are automated and what procedures would be manual?
4. What are the potential causes of "shutdown and de-energizing" procedural failure and what back-up measures would be made available?
5. Please specifically estimate the time to accomplish procedural measures and the additional time if back-up measures are required.
6. For any task described in Requests 1-17 that may not be completed in time or before a fire front passes over the power plant site, please specify the next backup measure, if any, and the range of potential consequences for not completing any specific measure needed to secure the power plant during a wind-driven wildfire.
7. For the length of the proposed new natural gas pipeline, please locate on a map and describe with contours and impact types the diameter of the area that could be impacted with a leak and explosion. Please include the worst-case scenario and contour map of impact types with the impact zones.

8. What are the temperatures generated by combustion of Fuel Model 2 and Fuel Model 4 wildland fuels and how do those temperatures compare to the ignition points of flammable materials on the power plant site?

9. What are the ignition points of the following potential Project elements:
One (1) urea storage tank, approximately 20,000 gallons, and a handling system serving the SCR units;

- One (1) 4 million British thermal units per hour (MMBtu/hr) natural gas-fired heater (San Diego Air Pollution Control District [SDAPCD] exempt), used for heating of the natural gas fuel to the reciprocating engines;
- One (1) 4 MMBtu/hr natural gas-fired heater (SDAPCD exempt), used for heating of the engine cooling water system for 10-minute start capability;
- One (1) engine standby heater;
- One (1) new lube oil tank, approximately 10,000 gallons;
- One (1) used lube oil tank, approximately 10,000 gallons;
- One (1) maintenance service oil tank, approximately 6,000 gallons;
- Miscellaneous ancillary equipment;
- One (1) diesel fueled fire pump engine, rated at approximately 144 boiler horse power unit (bhp);
- One (1) diesel storage tank, approximately 250 gallons;
- Onsite 230kV facility switchyard including switchgear and the main voltage step-up transformer, switchgear, circuit breakers, and disconnects;;
- Approximately 1 mile of gen tie between the Project and the anticipated Point of Interconnection (POI) to the existing San Diego Gas & Electric (SDG&E) Miguel to Mission 230kV transmission line situated west of the plant site;
- Approximately 2,200 feet of 8-inch diameter natural gas pipeline lateral between the Project site and the existing SDG&E 20-inch diameter high pressure natural gas pipeline located across Mast Avenue from the landfill entrance;
- Thermoplastics on the Project site.

10. What type of fires might originate from the site with potential to spread offsite?

11. What is the expected rate of spread with fuel models for climax fuels on and adjacent to the Project site during 60 mph Santa Ana wind driven fires?

12. For the different types of fires with potential to originate onsite and to spread offsite, how much time would the closest homes/sensitive receptors have to evacuate an escaped fire under 60 mph Santa Ana wind conditions?

13. Please describe the brush management zones including lengths, locations and maintenance requirements. Would brush management zones extend off of the Project site parcel? What are the biological impacts and what is the mitigation for biological impacts of brush management zones?

14. What are the evacuation routes and safety zones for Project personnel and visitors on and off-site?

15. How much time will it take to prepare transportation, load passengers, account for employees and visitors, depart and arrive at safety zones identified?

16. Please describe the capacity, design and location of any shelter-in-place structure.

17. Has a fire protection plan been prepared for the Project? If so, please provide the plan.

DECLARATION OF SERVICE

I, Van Collinworth, declare that on October, 29, 2012, I served and filed a copies of the attached Data Requests 1-17 dated October 29, 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
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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.





**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 10/16/2012)**

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