

CALIFORNIA ENERGY COMMISSION

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January 17, 2013

Mr. Andy Wilson
California Pilots Association
31438 Greenbriar Lane
Hayward, CA 94544

California Energy Commission

DOCKETED**11-AFC-3**

TN # 69176

JAN 17 2013

Subject: **Quail Brush Generation Project, Energy Commission Staff's
Response to California Pilots Association Status Report #1**

Dear Mr. Wilson:

The California Energy Commission staff has reviewed the Status Report #1 that you recently filed with the Committee in charge of this proceeding. We thank you for taking the time to articulate the concerns of the California Pilots Association ("Association") regarding our review of the Quail Brush Generation Project (QBG) Application for Certification (11-AFC-3). Staff is providing this letter in response to several requests you made in the Association's status report.

Staff review of the QBG and preparation of the Preliminary Staff Assessment (PSA) is occurring at the same time the Federal Aviation Administration (FAA) is concluding a two-year study of thermal plumes, and conducting a meeting to outline the study results and describe a Plume Hazard model. The Energy Commission has interest in the FAA meeting occurring in Washington, D.C. and would like to receive any information that comes out of the meeting.

Staff has been working with FAA representatives on thermal plume issues since the Blythe I project came on line in 2002 and a pilot complained about turbulence from the project's thermal plumes. Staff initiated a compliance process in that case which included participants from the FAA and Caltrans Aeronautics. It became clear during this process that the FAA review of proposed construction or alteration projects via the Form 7460-1 process did not address industry generated plumes that could be a hazard to navigable airspace near airports. The FAA was also involved with the Russell City and Eastshore power plant siting proceedings in 2007 and 2008. During that period, staff encouraged the FAA to perform the necessary research and modeling to analyze potential impacts of industrial plumes on aviation safety. The FAA has previously taken the position that the standard Notice To Airmen (NOTAM) issued by the FAA advising pilots to avoid direct over-flight of all power plants is sufficient to ensure air traffic safety in this regard.

Energy Commission staff is using a plume average vertical velocity of 4.3 m/s as its current criteria to determine the critical velocity of concern to light aircraft. This is based on the Australian Civil Aviation Safety Authority (CASA) advisory circular (CASA 2004).

Vertical velocities below this level are not of concern to light aircraft. Staff hopes the new research and recommendations will be presented at the FAA's meeting.

The QBGP PSA will specifically address and analyze any potential hazards associated with plumes created during operation of the QBGP. As part of the Energy Commission's review process, the PSA will be made available to all interested agencies and the public for review and comment. The Energy Commission will also conduct public workshop(s) for the PSA which will allow for detailed discussion with staff members who authored the PSA. Regarding your request for staff to hold one or preferably two additional workshops *before* staff publishes the PSA, we do not plan to hold any additional workshops prior to publishing the PSA. However, plume issues can be addressed during the staff workshop(s) held after publication of the PSA and prior to publication of the Final Staff Assessment (FSA) for the project.

We would like to assure you that any pertinent information provided from the Association or the FAA that results in needed revisions or updates to the analysis presented in the PSA will be incorporated into the FSA. The Energy Commission looks forward to receiving the information forthcoming from the FAA and working with the California Pilots Association.

Please don't hesitate to contact me at (916).651-0966 if you have any questions. Thank you.

Sincerely,



Eric Solorio, Project Manager
Siting, Transmission and Environmental
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CC: Proof of Service List (11-AFC-3)



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**APPLICATION FOR CERTIFICATION FOR THE
QUAIL BRUSH GENERATION PROJECT**

DOCKET NO. 11-AFC-03
PROOF OF SERVICE
(Revised 12/28/2012)

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***After docketing, the Docket Unit
will provide a copy to the persons
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of documents to these persons
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Eric Solorio
Project Manager

Stephen Adams
Staff Counsel

DECLARATION OF SERVICE

I, Diane L. Scott declare that on January 17, 2013, I served and filed copies of the attached **Quail Brush Generation Project (11-AFC-03) Energy Commission Staff's Response to California Pilots Association Status Report #1**, dated January 17, 2013. This document is accompanied by the most recent Proof of Service, which I copied from 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) and to the Commission's Docket Unit, as appropriate, in the following manner:

(Check one)

For service to all other parties and filing with the Docket Unit at the Energy Commission:

- I e-mailed the document to all e-mail addresses on the Service List above and personally delivered it or deposited it in the US mail with first class postage to those parties noted above as "hard copy required"; **OR**
- Instead of e-mailing the document, I personally delivered it or deposited it in the US mail with first class postage to all of the persons on the Service List for whom a mailing address is given.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that I am over the age of 18 years.

Dated: January 17, 2013


Diane L. Scott, Project Assistant
Siting, Transmission and Environmental Protection Division