May 10, 2013

VIA HAND DELIVERY

Ms. Felicia Miller, Project Manager
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Re: Huntington Beach Energy Project (12-AFC-02)
Applicant’s Correspondence Related to Air Quality

Dear Ms. Miller:

Enclosed herein for docketing please find recent air quality correspondence for the Huntington Beach Energy Project between Applicant AES Southland Development, LLC, its consultant, CH2M Hill, Inc., the South Coast Air Quality Management District (“District”) and Commission Staff. The enclosed documents will be served to all parties pursuant to the enclosed Proof of Service.

Very truly yours,

[Signature]

Kimberly J. Hellwig
Energy & Environmental Policies Specialist

KJH:jmw
Enclosures
I think this is the only correspondence since the met data.

Here's the files you requested.

Jillian Baker, Ph.D.
South Coast AQMD
21865 Copley Drive,
Diamond Bar, CA 91765
Direct: 909.396.3176
| Year    | Season | 1  | 2  | 3  | 4  | 5  | 6  | 7  | 8  | 9  | 10 | 11 | 12 | 13 | 14 | 15 | 16 | 17 | 18 | 19 | 20 | 21 | 22 | 23 | 24 |
|---------|--------|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|
| 2009-2011 | Winter | 52.3 | 50.3 | 48.7 | 49.7 | 47.8 | 46.0 | 46.3 | 48.7 | 53.0 | 58.3 | 57.0 | 53.3 | 44.3 | 36.3 | 34.0 | 31.3 | 33.0 | 39.0 | 43.7 | 46.3 | 50.3 | 51.3 | 52.0 | 53.7 |
|         | Spring | 34.0 | 32.0 | 30.7 | 34.0 | 34.2 | 34.3 | 37.3 | 34.7 | 30.0 | 20.7 | 17.0 | 13.0 | 8.3 | 5.7 | 5.0 | 4.0 | 4.3 | 5.3 | 9.7 | 10.0 | 12.7 | 21.0 | 27.7 | 35.0 |
|         | Summer | 38.0 | 36.7 | 36.3 | 33.0 | 34.7 | 36.3 | 38.0 | 42.3 | 38.7 | 33.0 | 30.3 | 25.0 | 16.7 | 12.3 | 7.0 | 6.0 | 6.0 | 5.3 | 7.3 | 10.3 | 24.3 | 33.7 | 34.3 | 39.0 |
|         | Fall   | 49.0 | 47.7 | 48.3 | 44.7 | 43.0 | 41.3 | 43.7 | 43.7 | 51.3 | 55.3 | 48.3 | 45.7 | 45.0 | 41.3 | 36.3 | 39.0 | 43.0 | 40.0 | 40.3 | 42.7 | 44.7 | 48.3 | 51.7 | 48.3 |

Background Values for the LAX Monitor - NO\textsubscript{2} (ppb)

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</tr>
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</table>

Design

2009-2011 Value 55
Yes, we can make ourselves available from 9 to 10:30;

**Note to staff:** I will try to reserve a conference room for us at this end.

---

Jillian,

Friday from 9 am to 10:30 am works for us.

Felicia, Gerry, Wenjun, and Tao,

Can the CEC air quality staff participate on a call this Friday (4/5) from 9 to 10:30 am.

I will circulate an agenda and conference call numbers when a time/date are set.

Thanks,

*Jerry Salamy*

*Principal Project Manager*

*CH2M HILL/Sacramento*

*Phone 916-286-0207*

*Fax 916-614-3407*

*Cell Phone 916-769-8919*

---

Hi Jerry,

I spoke with John Frohning and he mentioned that you wanted to setup a conference call with us and CEC about the modeling. Looking at everyone’s schedules, we have Friday morning open, or we are available next week. Please let us know when you would like to schedule the call.
Thanks,
Jillian Baker, Ph.D.
South Coast AQMD
21865 Copley Drive,
Diamond Bar, CA 91765
Direct: 909.396.3176
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Thanks,
Jillian Baker, Ph.D.
South Coast AQMD
21865 Copley Drive,
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Direct: 909.396.3176
Jerry:

Here is one of our e-mail chains. It says that SCAQMD is asking HBEP to revise their modeling using the updated 5-year met files. Note the comment from Jillian Baker about excess percentage of missing hours and that the results “...may not be valid for regulatory purposes.”

-- Gerry

FYI

Hi Wenjun,

Yes, we have asked the applicant to revise the modeling and we also provided them with the updated met files a while back. The 3-year old data had too much missing hours in AERMOD and when we got the output files, we saw that each output had an error that the number of missing hours exceeds the EPA allowed 10% and the results might not be valid for regulatory purposes.

Jillian Baker, Ph.D.
South Coast AQMD
21865 Copley Drive,
Diamond Bar, CA 91765
Direct: 909.396.3176
Thank you very much for the explanations. We didn’t know you reprocessed the meteorological data. We were working with the old 3-year data. I know SCAQMD asked the applicant to revise the modeling for operational and cumulative modeling. We will need to ask the applicant to revise the modeling for construction too.

Thanks.

Wenjun

From: Jillian Baker [mailto:jbaker@aqmd.gov]  
Sent: Tuesday, April 02, 2013 2:27 PM  
To: Chris Perri; Qian, Wenjun@Energy  
Cc: Jiang, Tao@Energy; Bemis, Gerry@Energy  
Subject: RE: About Huntington Beach modeling

Hi Wenjun,

The wind speeds are scalar.

As you are aware, AERMET and AERMOD have been updated. We have reprocessed our met files to comply with the 5-year EPA requirement and updated our files on our website. The applicant downloaded the wrong version of the met file (only 3 years) and did not contact us at the time to ask for the 5-year met data set. I am not sure which met data you are referring to or using in your review. Regardless, the applicant should be using the 5-year met data (2005-2009) currently available on our website.

Please note that the 3-year met data used initially by the applicant yielded a much lower concentration than you would see when using the updated 5-year met data. This is because in the 3-year data, there were many calm winds at that met station which resulted in too many missing hours when used in AERMOD. Therefore, we have reprocessed the raw data to ensure that the calm winds were correctly characterized as calm and not missing.

Please let me know if you have any questions or need anything else.

Jillian Baker, Ph.D.  
South Coast AQMD  
21865 Copley Drive,  
Diamond Bar, CA 91765  
Direct: 909.396.3176

From: Chris Perri  
Sent: Tuesday, April 02, 2013 2:06 PM  
To: Qian, Wenjun@Energy; Jillian Baker  
Cc: Jiang, Tao@Energy; Bemis, Gerry@Energy  
Subject: RE: About Huntington Beach modeling

Hi Jillian,

Staff at CEC have some detailed questions regarding the HBEP modeling. Can you help them out? Thanks.

Chris Perri  
Air Quality Engineer  
South Coast Air Quality Management District  
(909) 396-2696
Mr. Perri,

This is Wenjun Qian at California Energy Commission. Tao Jiang and I are reviewing the air quality modeling files for Huntington Beach Energy Project. We have some questions about the modeling and we hope you or your modeling staff have some answers.

The applicant got the meteorological data files from your website. Do you know whether the wind speeds in the meteorological data files are scalar or vector means? As you may know that in the new version of AERMOD (version 12345), EPA fixed a bug by removing the assumption that the input wind speeds are vector mean winds. We tried to re-run the modeling files for Huntington Beach using an older version of AERMOD (12060) and the newest version (12345), the newest version gives lower impacts. But if we turn on the option to specify that the input wind speeds are vector means in version 12345, the impacts are the same as those from version 12060. This makes it very important for us to figure out whether the wind speeds used in your meteorological files are vector means or scalar means.

Thanks.

Wenjun Qian, Ph.D., P.E.
Air Resources Engineer
California Energy Commission
1516 9th St., MS-46
Sacramento, CA 95814
916-651-3768
Wenjun.Qian@energy.ca.gov
Here is the e-mail exchange I promised to forward.....

From: Jillian Baker [mailto:jbaker@aqmd.gov]
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Air Resources Engineer
California Energy Commission
1516 9th St., MS-46
Sacramento, CA 95814
916-651-3768
Wenjun.Qian@energy.ca.gov
We had an e-mail exchange with the SCAQMD; I will forward that message exchange as it provides good background on this.

Tao,
Was the Met data provided by the AQ district? If so, wouldn’t modeling using that data base be acceptable? Jerry Salamy had told me his staff was having problems getting reliable Met data from SCAQMD — is this the same data you’re referring to?

FELICIA MILLER - PROJECT MANAGER
Direct: (916) 654-4640 Fax: (916) 654-3882
felicia.miller@energy.ca.gov
CALIFORNIA ENERGY COMMISSION
Siting, Transmission & Environmental Protection (STEP) Division
1516 Ninth Street, Sacramento, CA 95814
www.energy.ca.gov

Think before you print.
This email may contain confidential and privileged material for the sole use of the intended recipient. Any review, use, distribution or disclosure by others is strictly prohibited. If you are not the intended recipient (or authorized to receive for the recipient), please contact the sender by reply email and delete all copies of this message.

Jerry,
A recent communication with the district modeling staff makes us realize that an earlier (and possibly wrong) version of Met data (only 3 years) was used in the HBEP modeling. The district has updated their meteorological data base with a new, 5-year Met data which meets the EPA and SCAQMD requirements. The new Met data ensure that the calm winds were correctly characterized as “calm” and not “missing”. This will lead to more light-wind conditions being modeled, and will likely lead to higher impacts. It may be necessary or appropriate to use the “paired approach” also called the “concurrent approach” to further refine modeling results.

We believe it would be appropriate for all the HBEP modeling to be redone, and updated to use the new meteorological data set. The updated modeling should include the recently submitted construction modeling and overlap periods
modeling, as well as the operation modeling and cumulative impact modeling. For the 1-hour NO2 modeling, please use the ambient NO2 ratio of 0.9 in the PVMRM option if you cannot justify the use of 0.8. It is our understanding that the 0.9 ambient NO2 ratio should be used according to EPA guidance. Please note that this is not the in-stack NO2/NOx ratio. Please also make sure the newest AERMOD Version (Version 12345) is used consistently for all the modeling. Note that this model requires the user to specify "vector" or "scalar" form of the met data. We understand that the more recent, 5-year data set is in scalar format. Let me know if you have any questions.

Tao Jiang, Ph.D., P.E.
Air Resources Engineer
Siting, Transmission and Environmental Protection Division California Energy Commission
1516 Ninth Street, MS 46
Sacramento, CA 95814-5504
Phone: (916) 654-3852
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Air Resources Engineer
Siting, Transmission and Environmental Protection Division California Energy Commission
1516 Ninth Street, MS 46
Sacramento, CA 95814-5504
Phone: (916) 654-3852
Attached is the .pfl file. Please let me know if you have any questions or need anything else.

Jillian Baker, Ph.D.
South Coast AQMD
21865 Copley Drive,
Diamond Bar, CA 91765
Direct: 909.396.3176

From: Keith.McGregor@CH2M.com  
[mailto:Keith.McGregor@CH2M.com]
Sent: Tuesday, October 23, 2012 12:02 PM
To: Jillian Baker
Cc: Jerry.Salamy@CH2M.com; Benjamin.Beattie@CH2M.com; Tom Chico
Subject: RE: RBEP: Meteorological Data Request for the LAX Monitoring Station

Hello Jillian,

Thank you for the clarification. We will adjust the hours on the ozone files accordingly.

Regards,

Keith McGregor
Project Manager
CH2MHILL
2485 Natomas Park Drive Suite 600
Sacramento, CA 95833
Direct: (916) 286-0221
Mobile: (916) 705-7624
Fax: (916) 614-3450

From: Jillian Baker [mailto:jbaker@aqmd.gov]
Sent: Tuesday, October 23, 2012 10:31 AM
To: McGregor, Keith/SAC
Cc: Salamy, Jerry/SAC; Beattie, Benjamin/SAC; Tom Chico
Subject: RE: RBEP: Meteorological Data Request for the LAX Monitoring Station

Hi Keith,

I checked with Dr. Sang-Mi Lee and confirmed that the ozone data is correct, even though the hours are mis-labeled. The met data uses the 01-24 nomenclature, representing the 1st to 24th hour of the day while the ozone data is labeled as 00-23, corresponding to the beginning hour of the data (i.e. midnight is the 1st hour of the day, but labeled as 00). As such you just need to rename the 00-23 to match the 01-24. The data is correct. Thanks for bringing this to our attention. The
updated ozone file should be ready by the end of the week or if you can’t wait, then you can just adjust the hour nomenclature accordingly (i.e. replace 00 with 01, etc).

Please let me know if you have any questions.

Jillian Baker, Ph.D.
South Coast AQMD
21865 Copley Drive,
Diamond Bar, CA 91765
Direct: 909.396.3176

Hello Jillian,

After reviewing the LAX meteorological and ozone datasets it appears that the hours are presented differently. The met data uses hour 01-24 while the ozone data uses hours 00-23. As a result AERMOD will not accept the data as-is. Can you please confirm if the ozone data will need to be rolled ahead by one hour to make the sets match.

Thank you,

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Direct: (916) 286-0221
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Good morning Keith,

Attached is the ozone file for LAX. Please let me know if you have any questions.

Jillian Baker, Ph.D.
South Coast AQMD
21865 Copley Drive,
Diamond Bar, CA 91765
Direct: 909.396.3176
Good Morning Jillian,

Thank you for the quick response. The modeling staff working with me have reminded me that they will also need the ozone data for the same time period. Is the 2005 – 2009 LAX ozone data also something that you can send to me?

Thank you,

Keith McGregor
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Direct: (916) 286-0221
Mobile: (916) 705-7624
Fax: (916) 614-3450

Hi Keith,

Due to the size of the files, I will be sending them to you separately. Here is the .sfc file.

Jillian Baker, Ph.D.
South Coast AQMD
21865 Copley Drive,
Diamond Bar, CA 91765
Direct: 909.396.3176

Good Afternoon Jillian,

We (CH2MHILL) are working with AES Southland Development, LLC to prepare the Redondo Beach Energy Project SCAQMD NSR/PSD application and the CEC Application for Certification. Tom Chico noted in his response to the Dispersion Modeling Protocol that five years of SCAQMD AERMET-processed meteorological data are available for the LAX monitoring station. We have downloaded the three years of data available on the website (2005-2007) but Tom
mentioned you may be able to help us obtain the remaining two years (2008 and 2009). Can the remaining two years be sent to us via email?

Thank you for your assistance,

Keith McGregor  
Project Manager  
CH2M HILL  
2485 Natomas Park Drive Suite 600  
Sacramento, CA 95833  
Direct: (916) 286-0221  
Mobile: (916) 705-7624  
Fax: (916) 614-3450
Hi Keith,

As you are aware, AERMET Version 12345 was updated back in December 2012. We have reprocessed the meteorological data using this new version and I am attaching the .sfc file to this email. The .pfl file will be sent in a subsequent email.

Jillian Baker, Ph.D.
South Coast AQMD
21865 Copley Drive,
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From: Keith.McGregor@CH2M.com [mailto:Keith.McGregor@CH2M.com]
Sent: Wednesday, October 17, 2012 7:12 PM
To: Jillian Baker
Cc: Jerry.Salamy@CH2M.com; Benjamin.Beattie@CH2M.com
Subject: RE: RBEP: Meteorological Data Request for the LAX Monitoring Station

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Fax: (916) 614-3450

From: Jillian Baker [mailto:jbaker@aqmd.gov]
Sent: Wednesday, July 25, 2012 7:38 AM
To: McGregor, Keith/SAC
Cc: Tom Chico; Salamy, Jerry/SAC; stephen.okane@aes.com
Subject: RE: RBEP: Meteorological Data Request for the LAX Monitoring Station

Good morning Keith,

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We (CH2M HILL) are working with AES Southland Development, LLC to prepare the Redondo Beach Energy Project SCAQMD NSR/PSD application and the CEC Application for Certification. Tom Chico noted in his response to the
Dispersion Modeling Protocol that five years of SCAQMD AERMET-processed meteorological data are available for the LAX monitoring station. We have downloaded the three years of data available on the website (2005-2007) but Tom mentioned you may be able to help us obtain the remaining two years (2008 and 2009). Can the remaining two years be sent to us via email?

Thank you for your assistance,

Keith McGregor  
Project Manager  
CH2M HILL  
2485 Natomas Park Drive Suite 600  
Sacramento, CA 95833  
Direct: (916) 286-0221  
Mobile: (916) 705-7624  
Fax: (916) 614-3450
In your Responses to Data Requests, Set 2A (Public Health #74-77), new risk values at PMI for construction were calculated. And they are higher than the significance level of 10 in one million (16.5 for children and 11.1 for adults). In page 4, it was written “... although the PMI excess cancer risk is greater than 10 in one million, the elevated risk only occurs in areas where public access is controlled (i.e., within the AES-controlled fence line) or in areas that are not considered residential, commercial, or habitable, as presented in Figure DR76-1. Additionally, potential exposure would be sporadic and limited in length.” However, I checked LORS and found in SCAQMD Rule 1401, 10 in one million is the significance level for MICR (maximum individual cancer risk), no matter where it is. Therefore, the construction risk values are higher than the significance level and we need to propose some mitigation measures to reduce the risk.

I am wondering if you know why the risk values are so high, and if you would like to redo the analysis, or propose any mitigation measure to reduce the risk? Thanks.

Ann
Huei-An (Ann) Chu, Ph.D.
Air Resources Engineer
California Energy Commission
1516 Ninth Street, MS-46
Sacramento, California 95814
(916) 651-0965
Ann.Chu@energy.ca.gov
Hi Ann,

Please contact Jerry Salamy of CH2M Hill @ (916) 286-0207. Please write up an ROC, so we can track the information.

Thanks, Felicia

FELICIA MILLER - PROJECT MANAGER

Direct: (916) 654-4640  Fax: (916) 654-3882
felicia.miller@energy.ca.gov
CALIFORNIA ENERGY COMMISSION
Siting, Transmission & Environmental Protection (STEP) Division
1516 Ninth Street, Sacramento, CA 95814
www.energy.ca.gov
You are copied on all correspondence to SCAQMD, so no worries there.

Jerry Salamy
Principal Project Manager
CH2M HILL/Sacramento
Phone 916-286-0207
Fax 916-614-3407
Cell Phone 916-769-8919

From: Miller, Felicia@Energy [mailto:Felicia.Miller@energy.ca.gov]
Sent: Wednesday, March 13, 2013 9:43 AM
To: Salamy, Jerry/SAC
Subject: RE: Contact Info

Thanks Jerry. Please send me an email once CH2M has submitted the package. Gotta keep the bosses happy! Will check on the call with Ann this morning.

Jerry Salamy
Principal Project Manager
CH2M HILL/Sacramento
Phone 916-286-0207
Fax 916-614-3407
Cell Phone 916-769-8919

From: Miller, Felicia@Energy [mailto:Felicia.Miller@energy.ca.gov]
Sent: Wednesday, March 13, 2013 8:48 AM
To: Salamy, Jerry/SAC
Subject: RE: Contact Info

Thanks Jerry. Let me see if I can set up a conference call on this, as I’d like to wrap up her questions. Have you filed the HBEP supplemental information to SCAQMD?

Jerry Salamy
Principal Project Manager
CH2M HILL/Sacramento
Phone 916-286-0207
Fax 916-614-3407
Cell Phone 916-769-8919

From: Miller, Felicia@Energy [mailto:Felicia.Miller@energy.ca.gov]
Sent: Wednesday, March 13, 2013 4:31 PM
To: Miller, Felicia@Energy; Robert.Mason@CH2M.com
Subject: RE: Contact Info
Felicia,

The Public Health contact would be me as my public health person is on vacation.

Jerry Salamy  
Principal Project Manager  
CH2M HILL/Sacramento  
Phone 916-286-0207  
Fax 916-614-3407  
Cell Phone 916-769-8919

From: Miller, Felicia@Energy

Sent: Tuesday, March 12, 2013 4:08 PM
To: Mason, Robert/SCO; Salamy, Jerry/SAC
Subject: FW: Contact Info

Hi Jerry and Robert (who is supposed to be on vacation),

Please see the below email from Ann Chu. My guess is the project contact is Jerry for Public Health. Please send me a response to confirm. This time, I’d like to set up a conference call, so I can monitor progress in this area. I actually thought we had everything in hand, but apparently we don’t. Thanks guys, F

FELICIA MILLER - PROJECT MANAGER
Direct: (916) 654-4640 Fax: (916) 654-3882
felicia.miller@energy.ca.gov
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Think before you print.

This email may contain confidential and privileged material for the sole use of the intended recipient. Any review, use, distribution or disclosure by others is strictly prohibited. If you are not the intended recipient (or authorized to receive for the recipient), please contact the sender by reply email and delete all copies of this message.

From: Chu, Ann@Energy
Sent: Tuesday, March 12, 2013 2:49 PM
To: Miller, Felicia@Energy
Subject: Contact Info

Hi, Felicia,

I am wondering if you have the contact info of the person who prepare the Public Health section. I have some questions about his risk assessment and would like to talk him. Gerry said I can send another data request but I would like to try email/phone call to save us some time. Thanks.

Ann
Huei-An (Ann) Chu, Air Resources Engineer
Siting, Transmission and Environmental Protection Division
California Energy Commission
1516 Ninth Street MS-46
Sacramento, California 95814
(916)651-0965
**APPLICATION FOR CERTIFICATION FOR THE**

**HUNTINGTON BEACH ENERGY PROJECT**

<table>
<thead>
<tr>
<th>Docket No. 12-AFC-02</th>
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<td>PROOF OF SERVICE</td>
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<td>(Revised 03/26/2013)</td>
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</table>

**SERVICE LIST:**

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**INTERESTED AGENCIES**
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<table>
<thead>
<tr>
<th>INTERESTED AGENCIES (Cont’d.)</th>
</tr>
</thead>
<tbody>
<tr>
<td>California Coastal Commission</td>
</tr>
</tbody>
</table>
| Tom Luster  
45 Fremont Street, Suite 2000  
San Francisco, CA 94105-2219  
tluster@coastal.ca.gov |
| California State Parks  
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21601 Pacific Coast Highway  
Huntington Beach, CA 92646  
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| City of Huntington Beach  
Planning & Building Department  
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Aaron Klemm  
2000 Main Street, 3rd floor  
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| City of Huntington Beach  
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Cathy Fikes  
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2000 Main Street, 4th floor  
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<table>
<thead>
<tr>
<th>INTERESTED AGENCIES (Cont’d.)</th>
</tr>
</thead>
</table>
| Santa Ana Regional  
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3737 Main Street, Suite 500  
Riverside, CA 92501-3339  
gstewart@waterboards.ca.gov |
| Huntington Beach  
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California Energy Commission – Docket Unit  
Attn: Docket No. 12-AFC-02  
1516 Ninth Street, MS-4  
Sacramento, CA 95814-5512  
docket@energy.ca.gov |

*indicates change
73587224.1 0043653-00005
OTHER ENERGY COMMISSION PARTICIPANTS (LISTED FOR CONVENIENCE ONLY):

After docketing, the Docket Unit will provide a copy to the persons listed below. Do not send copies of documents to these persons unless specifically directed to do so.

ANDREW McALLISTER
Commissioner and Presiding Member

KAREN DOUGLAS
Commissioner and Associate Member

Susan Cochran
Hearing Adviser

Hazel Miranda
Adviser to Commissioner McAllister

Patrick Saxton
Adviser to Commissioner McAllister

Galen Lemei
Adviser to Commissioner Douglas

Jennifer Nelson
Adviser to Commissioner Douglas

Eileen Allen
Commissioners’ Technical Adviser for Facility Siting
DECLARATION OF SERVICE

I, Judith M. Warmuth, declare that on May 10, 2013, I served and filed copies of the attached Applicant’s Correspondence Related to Air Quality dated May 10, 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/huntington_beach_energy/index.html.

The document has been sent to the other parties on the Service List above 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: May 10, 2013

Judith M. Warmuth