

**DOCKET**

**08-AFC-10**

DATE AUG 24 2009

RECD AUG 24 2009

August 24, 2009

California Energy Commission  
Docket Unit  
1516 Ninth Street  
Sacramento, CA 95814-5512

Subject: **Northern California Power Agency  
Lodi Energy Center BACT: Limit for CO  
Docket No. (08-AFC-10)**

Enclosed for filing with the California Energy Commission is the original of **NCPA  
Lodi Energy Center: BACT Limit for CO**, for the Lodi Energy Center Docket No.  
(08-AFC-10).

Sincerely,



Marie Mills



P.O. Box 1478  
12745 N. Thornton Road  
Lodi, CA 95241

(209) 333-6370

[www.ncpa.com](http://www.ncpa.com)

August 24, 2009

David Warner  
Director of Permit Services  
San Joaquin Valley Air Pollution Control District  
1990 E. Gettysburg Ave  
Fresno, CA 93726-0244

Subject: NCPA Lodi Energy Center: BACT Limit for CO

Dear Mr. Warner:

Thank you very much for your expeditious review of our supplemental application and for your determination of completeness for the revisions to the NCPA Lodi Energy Center gas turbine/HRSG project. We sincerely appreciate your willingness to work with us in keeping the project on schedule.

While we continue to believe that a 2 ppm CO limit for this project while achievable, is not cost effective, would reduce gas turbine output and increase fuel consumption, and would not provide any significant air quality benefit. As we discussed in our recent meeting, NCPA is committed to bringing this project online by the summer of 2012. Therefore, in order to avoid the delay that could result from continued evaluation of BACT for CO for the project, we agree to accept a CO limit of 2 ppmvd @ 15% O<sub>2</sub> on a 3-hour average basis for the gas turbine/HRSG except during commissioning, startups and shutdowns.

We hope that this additional information will allow you to complete your review and issue the draft Final Determination of Compliance. If you have any questions regarding this proposal, or any other questions regarding the Lodi Energy Center project, please do not hesitate to call me or Nancy Matthews of Sierra Research at (916) 273-5124.

Sincerely,

Ed Warner  
Northern California Power Agency

cc: Rupi Gill, SJVAPCD  
Jag Kahlon, SJVAPCD  
Rod Jones, CEC Project Manager  
CEC docket  
Joseph Lapka, EPA Region 9



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](http://WWW.ENERGY.CA.GOV)

APPLICATION FOR CERTIFICATION  
FOR THE *Lodi Energy Center*

Docket No. 08-AFC-10

PROOF OF SERVICE  
(Revised 2/17/09)

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INTERESTED AGENCIES

California ISO  
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DECLARATION OF SERVICE

I, Ashley Y. Garner, declare that on August 24, 2009, I served and filed copies of the attached **NCPA Lodi Energy Center: BACT Limit for CO** dated **August 24, 2009**. The original document, filed with the Docket Unit, is accompanied by a copy of the most recent Proof of Service list, located on the web page for this project at: [[www.energy.ca.gov/sitingcases/lodi](http://www.energy.ca.gov/sitingcases/lodi)]. The document has been sent to both the other parties in this proceeding (as shown on the Proof of Service list) and to the Commission's Docket Unit, in the following manner:

**(Check all that Apply)**

**For service to all other parties:**

sent electronically to all email addresses on the Proof of Service list;

by personal delivery or by depositing in the United States mail at Sacramento, California with first-class postage thereon fully prepaid and addressed as provided on the Proof of Service list above to those addresses **NOT** marked "email preferred."

**AND**

**For filing with the Energy Commission:**

sending an original paper copy and one electronic copy, mailed and emailed respectively, to the address below (*preferred method*);

**OR**

depositing in the mail an original and 12 paper copies, as follows:

**CALIFORNIA ENERGY COMMISSION**

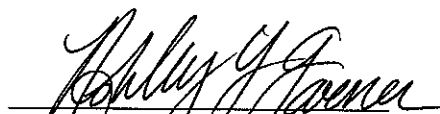
Attn: Docket No. **08-AFC-10**

1516 Ninth Street, MS-4

Sacramento, CA 95814-5512

[docket@energy.state.ca.us](mailto:docket@energy.state.ca.us)

I declare under penalty of perjury that the foregoing is true and correct.

  
Ashley Y. Garner