



**CONTRA COSTA
WATER DISTRICT**

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DOCKET	
08-AFC-3	
DATE	JAN 21 2009
RECD.	JAN 23 2009

January 21, 2009

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General Manager

Mr. Ivor Benci-Woodward, Project Manager
Mr. Mike Monasmith, Project Manager
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

Subject: Recycled Water for the Willow Pass and Marsh Landing Generating Stations

Dear Messrs Benci-Woodward and Monasmith,

The Contra Costa Water District (CCWD) would like to comment on the proposed water supply for the Willow Pass and March Landing Generating Stations. CCWD is a publicly owned water supply agency serving municipal and industrial water to about 550,000 people in central and eastern Contra Costa County and is the water service provider for the proposed generating stations. CCWD's customers also include 9 major industries, 36 smaller industries and businesses, and 50 agricultural users. The mission of CCWD is to strategically provide a reliable supply of high quality water at the lowest cost possible, in an environmentally responsible manner.

CCWD has concerns with the California Energy Commission's (CEC) requirement for recycled water as the boiler feed water supply to these new generating facilities. It appears that the specific effects of recycled water use in this area of the Delta have not been given consideration. CCWD requests that the CEC's preference for recycled water service to new power facilities located within this area of the Delta watershed be reviewed considering the factors discussed below. CCWD staff would like to meet with both of you to further discuss these circumstances so that you can understand the full ramifications of recycled water use in this situation.

The following factors need to be considered in the evaluation of recycled water use within the Delta:

- A large portion (30-40%) of the water delivered to CCWD's service area returns to Suisun Bay and the Delta via wastewater treatment plants operated by the Delta Diablo Sanitation District (DDSD) and others. All water discharged to this area of the Delta becomes part of the Delta pool and is put to beneficial use through re-diversion by others or in preventing seawater intrusion into the Delta.

**PROOF OF SERVICE (REVISED 12/15/08) FILED WITH
ORIGINAL MAILED FROM SACRAMENTO ON 01/26/09**

TKG

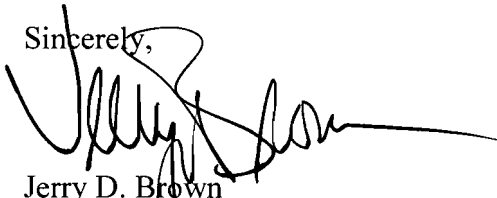
Mr. Ivor Benci-Woodward, Project Manager
Mr. Mike Monasmith, Project Manager
California Energy Commission
January 21, 2009
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Recycling water in the Delta that otherwise would have been discharged by DDSD requires additional releases of high quality water from upstream reservoirs (Lake Shasta, Lake Oroville, Lake Folsom) to prevent salt water intrusion into the Delta which impacts water supplies. Recycling in this area of the Delta watershed in most circumstances does not create new water supply.

- The CEC should evaluate the greenhouse gas (GHG) implications of water supply in addition to project construction related emissions. The GHG analysis for each project should consider the energy intensity (or energy use for conveyance, treatment and distribution) of the water supply. The unit energy requirements to deliver recycled water in CCWD's service area exceed the energy requirements to deliver untreated surface water. Project GHG emissions are further impacted through the loss in cooling tower utilization. Recycled water has higher dissolved solids than surface water, resulting in fewer cooling cycles and an increase in overall water use versus untreated surface water. GHG emissions resulting from the construction of duplicative conveyance facilities, treatment, and distribution of recycled water result in significantly greater GHG emissions than the surface water alternative.
- The cost of recycled water in this situation is prohibitive. A study is being conducted to evaluate recycled water use for industry and the results show that recycled water is at least double the cost of surface water.

Please call me at (925) 688-8172 to set up a meeting.

Sincerely,



Jerry D. Brown
Assistant General Manager

JQ/rlr

cc: Mr. Gary Darling (DDSD)
Mr. Jonathan Sacks (Mirant)



**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 MARSH LANDING
GENERATING STATION**

**DOCKET No. 08-AFC-3
PROOF OF SERVICE
(REVISED 12/15/2008)**

INSTRUCTIONS: All parties shall 1) send an original signed document plus 12 copies OR 2) mail one original signed copy AND e-mail the document to the web address below, AND 3) all parties shall also send a printed OR electronic copy of the documents that shall include a proof of service declaration to each of the individuals on the proof of service:

CALIFORNIA ENERGY COMMISSION
Attn: Docket No. 08-AFC-03
1516 Ninth Street, MS-15
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DECLARATION OF SERVICE

I, Teraja` Golston, declare that on January 26, 2009, I deposited copies of the attached Marsh Landing Generation Station (08-AFC-3) Contra Costa Water District Comment Letter, in the United States mail at Sacramento, California with first-class postage thereon fully prepaid and addressed to those identified on the Proof of Service list above.

OR

Transmission via electronic mail was consistent with the requirements of California Code of Regulations, title 20, sections 1209, 1209.5, and 1210. All electronic copies were sent to all those identified on the Proof of Service list above.

Original Signature in Dockets
Teraja` Golston

* indicates change