

DOCKETED

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VIA E-FILING

Mr. Dale Rundquist, Compliance Project Manager
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

**Re: Pio Pico Energy Center (11-AFC-01C)
Project Owner's Comments on the Staff Analysis of the Heat Input PTA**

Dear Mr. Rundquist:

On November 6, 2015, California Energy Commission Staff published its Staff Analysis for the Pio Pico Energy Center Project ("PPEC" or "Project") Heat Input Petition to Amend ("PTA") and requested comments in writing no later than December 7, 2015. Pio Pico Energy Center, LLC ("Project Owner") has reviewed the Staff Analysis and has the following minor comments on the Air Quality section of the Staff Analysis:

- On page 8 of the Staff Analysis, in the second definition re Compliance Time Periods, Staff appears to have inadvertently deleted the word "data" after "CEMS" at the end of the definition, just prior to the bracketed rule citations. The word "data" should remain in the definition.
- AQ-30 & AQ-59: Staff proposed to change "4-unit" to "four- unit" to match the language in the FDOC, but failed to strikethrough the number 4 twice in AQ-30. The Staff analysis reads: "For each rolling **four**4-unit-operating-hour period..." and the same error is carried through at the end of AQ-30. The number 4 should be deleted from the Condition. Similarly, the number number 4 should be deleted after "four" in AQ-59 subsections h and i.
- AQ-31: The word "subsets" included in the new language at the end of the Condition should be revised to reflect the term "subtests" used in the FDOC amendment.



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Project Owner appreciates Staff's attention to and processing of the PTA and looks forward to the January 13, 2016 CEC Business Meeting at which the Commission may issue its decision on the Petition.

Respectfully submitted,

A handwritten signature in blue ink that reads "Melissa A. Foster". The signature is written in a cursive style with a large initial 'M'.

Melissa A. Foster
MAF:jmw

cc: W. David Jenkins, Pio Pico Energy Center, LLC
Margaret Fitzgerald, CH2M Hill
Gary Rubenstein, Sierra Research, Inc.