CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET
SACRAMENTO, CA 95814-5512
www.energy.ca.gov

DOCKET
08-AFC-7
DATE OCT 21 2008
RECD. OCT 21 2008

October 21, 2008

Doug Wheeler
Vice President
GWF Energy, LLC
4300 Railroad Avenue
Pittsburg, CA 94565

RE: GWF TRACY COMBINED CYCLE POWER PLANT PROJECT (08-AFC-7) - DATA REQUESTS SET 1 (#s 1-37)

Mr. Wheeler:
Pursuant to Title 20, California Code of Regulations, Section 1716, the California Energy Commission staff seeks the information specified in the enclosed data requests. The information requested is necessary to: 1) more fully understand the project, 2) assess whether the facility will be constructed and operated in compliance with applicable regulations, 3) assess whether the project will result in significant environmental impacts, 4) assess whether the facilities will be constructed and operated in a safe, efficient and reliable manner, and 5) assess potential mitigation measures.

This set of data requests (#1-32) is being made in the areas of Air Quality (# 1-15), Biological Resources (#16-19); Cultural Resources (#20-28), Geology and Paleontology (# 29); Land Use (#30-31); and Soil and Water Resources (#32-37). Written responses to the enclosed data requests are due to the Energy Commission staff on or before November 21, 2008, or at such later date as may be mutually agreeable.

If you are unable to provide the information requested, need additional time, or object to providing the requested information, you must send a written notice to both the Committee and me within 20 days of receipt of this notice. The notification must contain the reasons for not providing the information, the need for additional time, and the grounds for any objections (see Title 20, California Code of Regulations, Section 1716 (f)).

If you have any questions, please call me at (916) 653-1639 or email me at cmeyer@energy.state.ca.us.

Sincerely,

Original signature in Dockets
Christopher Meyer
Project Manager

Enclosure
cc: Docket (08-AFC-7)
Proof of Service List

PROOF OF SERVICE (REVISED _____) FILED WITH
ORIGINAL MAILED FROM SACRAMENTO ON 10/21/08
AA

Technical Area: Air Quality
Author: Brewster Birdsall

BACKGROUND

Greenhouse Gas Emissions

Energy Commission staff seeks to quantify the emissions of greenhouse gases (GHG) caused during construction of the project. These include carbon dioxide, nitrous oxide, and methane (unburned natural gas). AFC Section 5.1.6.1 identifies the applicant proposed mitigation for construction, but staff needs to identify all feasible measures for increasing energy efficiency and reducing GHG emissions from construction. Staff also seeks to quantify emissions from worker commutes and material deliveries during operation of the proposed project.

DATA REQUESTS

1. Please quantify the total and annual average GHG emissions for the construction phase of the proposed project. Staff considers the construction phase to include the activities at the construction site, any construction activities for linear facilities (gas and water pipelines and transmission lines), worker commutes, and material deliveries.
2. Please identify the measures and control strategies that would be implemented to minimize or reduce GHG emissions caused during the construction phase of the proposed project.
3. Please quantify emissions of criteria pollutants and GHG from worker commutes and material deliveries during operation of the proposed project.

BACKGROUND

Commissioning

The total number of hours necessary to complete the commissioning phase is not shown in AFC Section 5.1.4.1.2 or Appendix Table 5.1B-1. Without this information, it is not possible to confirm the total commissioning period emissions shown in AFC Table 5.1-5

DATA REQUESTS

4. Please quantify the number of anticipated hours for each of the commissioning steps in AFC Appendix Table 5.1B-1.
5. Please quantify the total number of operational hours needed for the commissioning phase of the proposed project and confirm the emission totals shown in AFC Table 5.1-5.

BACKGROUND

Startup Emissions

Staff aims to assess whether the proposed project would use the best available technology for minimizing emissions and durations in startup mode. According to public press releases from the manufacturer, the General Electric Rapid Response design and OpFlex turbine technology is available for new General Electric Frame 7F combustion turbines in combined-cycle systems. It is not clear from the AFC whether minimizing combined-cycle startup emissions from the existing Frame 7E turbines was a design consideration.

DATA REQUESTS

6. Please describe what features were considered for minimizing startup mode emissions and durations caused by the existing Frame 7E combustion turbines in the proposed combined-cycle system. Include in this discussion whether aspects of the GE Rapid Response design systems could be incorporated in the existing Frame 7E turbine systems.
7. Please provide a discussion that demonstrates all feasible modifications have been considered and included in the proposed changes to the fuel system, turbine control system, steam control system, or other systems, including the proposed auxiliary boiler, to minimize combined-cycle startup emissions and durations.

BACKGROUND

Nitrogen Oxides (NOx) Emissions

Startup emissions of nitrogen oxides (NOx) are shown to be approximately 399 lb/hr for both turbines combined, during the worst hour of startup (AFC Table 5.1B-5). There is no explanation for why these emissions should be greater than those during commissioning, when numerous startups would occur, which are shown to be 161 lb/hr per turbine (AFC Table 5.1-5) or 322 lb/hr for both turbines combined.

DATA REQUESTS

8. Please provide the emission calculations used to derive the 399 lb/hr emission rate and total emissions per event for NOx during startups.
9. Please confirm the 161 lb/hr per turbine maximum emission rate for commissioning shown in AFC Table 5.1-5.

BACKGROUND

Particulate Matter Emission Rate

AFC Table 5.1-14 shows that for air dispersion modeling input, a total particulate matter (PM10/PM2.5) rate of 5.8 lb/hr is used for each turbine over a 24-hour period, which indicates a combined hourly rate of 11.6 lb/hr and a combined daily rate of 278.4 lb/day. However, AFC Table 5.1-10 portrays the hourly maximum rate as 9.4 lb/hr during a startup and the daily maximum rate as 264 lb/day, or 11.0 lb/hr per turbine. The maximum rate is also shown as 11.0 lb/hr per turbine for a startup in AFC Appendix Table 5.1B-2.

DATA REQUESTS

10. Please provide the emission calculations or assumptions used to derive the stated particulate matter emission rates.
11. Please confirm the maximum PM10/PM2.5 emission rates during startups and routine operations and explain how the differences between the two modes of operation would affect emissions.

BACKGROUND

Dispersion Modeling

AFC Table 5.1-17 shows the modeled impacts of nitrogen dioxide (NO_2) during testing of one of the emergency diesel engines. Staff believes that concurrent operation of diesel engine testing with both turbines commencing startup is not a common operational scenario.

DATA REQUEST

12. Please summarize the results of modeling for 1-hour NO_2 impacts during simultaneous startup of two combustion turbines, without operation of emergency diesel engines.

BACKGROUND

Emission Reduction Credits

AFC Table 5.1-23 shows the currently permitted emissions for original project, and amounts of credits for reductions of carbon monoxide (CO) and sulfur dioxide (SO_2) that would be surrendered voluntarily. This table also shows the quantity of reductions of NOx that would be applied to particulate matter increases, at a ratio of 2.38-to-1 that was derived from a Sierra Research study that was not included in the AFC. Staff needs additional information on the ERCs that will be surrendered as mitigation for the SO_2 and CO increases and the inter-pollutant study that was used to determine the NOx to PM trading ratio.

DATA REQUESTS

13. Please identify the emission reduction credits that GWF owns for CO and SO_2 that would be surrendered voluntarily, by certificate number, date of original reduction, and location of original reduction.
14. Please provide a copy of the reference for the inter-pollutant trading ratio of 2.38-to-1 for NOx-to-particulate matter, from Sierra Research, dated March 7, 2008.

BACKGROUND

Cumulative Modeling Analysis

AFC Section 5.1.7 describes a cumulative modeling impact assessment that has not yet been filed with the Energy Commission.

DATA REQUEST

15. Please provide the analysis of cumulative air quality impacts.

Technical Area: Biological Resources
Author: Laurel Cordonnier

BACKGROUND

In the Data Adequacy Supplement, the applicant provided some but not all records of conversation for agency staff contacts regarding the project and potential biological issues of concern. The applicant indicated the San Joaquin County and U.S. Fish and Wildlife Service (USFWS) contacts were forthcoming. In addition, the California Department of Fish and Game (CDFG) regional biologist record of conversation stated that the applicant needs to follow up with the new unit biologist who, effective mid-September, serves as the new CDFG contact for this project for concurrence on the previous project review and a final determination regarding the need for protocol-level surveys for burrowing owl.

DATA REQUESTS

16. Please provide the remaining USFWS and San Joaquin County records of conversation.
17. Please contact the new CDFG biologist and provide a record of conversation that includes a discussion on the need for burrowing owl surveys and other potential project-related biological resource impacts or issues of concern.

BACKGROUND

Section 5.2.2.3.1 discusses the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan (SJMSCP) and the Tracy Peaker Project's (TPP) land purchase SJMSCP fee payment, which were required by a habitat compensation condition of certification. Staff could not locate a detailed description of the SJMSCP's biological resource goals, policies, and programs in the AFC or the TPP licensing materials (Appendix 1A). Also, page 5.2-6 states that because the current project construction impacts would occur in the area covered by the SJMSCP fee for the TPP and reconductoring would occur in disturbed areas with best management practices, "…no additional SJMSCP fees or other mitigation are anticipated for GWF Tracy construction at this time." It is unclear how the previous land purchase and fee were calculated and which species are covered by this mitigation.

DATA REQUESTS

18. Please discuss the project's compliance with the SJMSCP in general and specifically with respect to individual special-status species of concern to the project (e.g., burrowing owl, San Joaquin kit fox) and provide an analysis of how each is covered by the TPP's land purchase and fee.
19. Please contact county staff about whether any additional mitigation would be required for the GWF Tracy project and include the discussion and rationale in a record of conversation (can be included in the one requested above).

Technical Area: Cultural Resources
Authors: Seetha N. Reddy and Beverly E. Bastian

BACKGROUND

Staff's data adequacy review of the GWF Tracy Combined Cycle Power Plant (GWF Tracy) Application for Certification (AFC) identified a number of California Historical Resources Information System (CHRIS) Central California Information Center (CCIC) reports, copies of which the applicant needed to provide for the AFC to be approved as Data Adequate for cultural resources. Staff finds that two of those required reports (listed in AFC Table 5.3-4) were not received and so is asking for them now.

Additionally, in support of the present application, the applicant provided cultural resources data compiled for the AFC for the now-operating Tracy Peaker Project (TPP), including a project-sponsored cultural resources technical report by Racheal Egherman, dated August, 2001. Attachment 3.3-2 of that report references a study of transmission lines in the vicinity of the TPP, conducted by JRP Historical Consulting. Staff needs to review this study to assess whether the Tesla-Manteca 115-kV transmission line, to which the GWF Tracy project proposes to interconnect, may be a historical resource under CEQA.

DATA REQUESTS

20. Under confidential cover, please provide copies of CCIC technical reports #716 and #4216, whose survey coverage is within 0.25 mile of two of the three transmission line segments that the GWF Tracy project proposes to reconductor.
21. Please provide a copy of this study: JRP Historical Consulting Services, "Historic Resources Inventory and Evaluation Report, Transmission Lines in the Stanislaus Corridor, Alameda County, California," October, 2000. This need not be provided under confidential cover.

BACKGROUND

The GWF Tracy AFC's project description (pp. 2-1–2-2) lists several equipment installations that appear to require foundations capable of considerable weight-bearing. Staff assumes that such foundations would have to extend to some depth in the ground and additionally that overexcavation of the holes for these foundations and filling with engineered fill could be required to ensure the stability of the foundations. To assess potential project impacts to possible buried archaeological resources, staff needs information on the greatest depths to which the excavations for the proposed equipment foundations would extend, and the locations of any excavations expected to exceed four feet below the surface.

The proposed new steam turbine generator (STG) and air-cooled condenser (ACC) are to be installed where a stormwater basin is currently located. Staff needs information on the depth of the stormwater basin, and how much deeper than the basin's greatest depth the foundations for the new equipment would extend into undisturbed ground.

DATA REQUESTS

22. Please provide the depths of the excavations required for the following features and foundations for proposed equipment:
    a) HRSGs
    b) 150-foot-tall, 17-foot-diameter exhaust stacks
    c) auxiliary boiler
    d) 50-foot-tall, 4-foot-diameter boiler stack
    e) 400,000-gallon service water tank
    f) 125,000-gallon demineralized water tank
    g) modified water piping system, fire protection system, natural gas piping system, and stormwater drainage collection system
    h) stormwater retention basin
    i) new water treatment building
    j) pole or poles for the new on-site 115-kV overhead transmission line
    k) 45-foot-tall, 5.5-foot-diameter, tubular steel poles for interconnection to the 115-kV Tesla-Manteca transmission line
23. Please provide a project site plan showing the locations of equipment for whose foundations excavation would exceed four feet below the surface. A site plan such as AFC Figure 2.1-1 with the appropriate equipment indicated by shading or other such convention would be acceptable.
24. Please provide the greatest depth of the existing stormwater retention basin and the greatest depths of the excavations below the bottom of the stormwater retention basin required for the foundations of the STG and ACC.

BACKGROUND

Several AFC sections reference a previous geotechnical study for the TPP at the proposed project site, but no geotechnical report was included with the present AFC. If a later geotechnical study is planned, staff believes that could present an opportunity for the applicant to reduce the amount of archaeological monitoring that staff recommends in the conditions for certification that would accompany a decision from the Commission to permit the proposed project. While it has not yet been established that the proposed project would disturb previously undisturbed ground (which is the purpose of the previous three data requests), if the applicant were to provide factual field data on the archaeological potential of the undisturbed geological deposits that underlie the portions of the proposed project area that will be subject to ground disturbance, then staff would have a more objective basis for scaling back the standard archaeological monitoring requirements. If this possibility interests the applicant, staff recommends that a professional geoarchaeologist participate in any future geotechnical study and collect the data needed for an analysis of the potential for buried archaeological deposits at the proposed GWF Tracy plant site. (”Professional geoarchaeologist” means an

archaeologist who is able to demonstrate the completion of graduate-level coursework in geoarchaeology, Quaternary science, or a related discipline.)

Involving a geoarchaeologist in a future geotechnical study is strictly voluntary. Staff offers two options below for this participation. The greater involvement the geoarchaeologist has in the geotechnical study, the more likely that the resulting cultural resources information would either reduce the project's archaeological monitoring requirements or focus them more efficiently and cost effectively than would otherwise be possible.

DATA REQUEST

25. Please choose one of the following options for the participation of a geoarchaeologist in the planned geotechnical study at the GWF Tracy project site.

    a) Please provide a professional geoarchaeologist the opportunity to observe, in the field, the removal of any sediment cores by the geotechnicians, to examine the cores, in the field or a laboratory, for physical and chemical indices of human activity, and, where feasible, to collect chronometric dating samples from the cores. At least one of the cores should be drilled to a depth that exceeds, by approximately one meter, the deepest construction excavations planned for the project. Prior to the field work, the geoarchaeologist should conduct background research on the geology and geomorphology of the project area to be able to place the stratigraphic units observed in the cores into a meaningful local sequence. The geoarchaeologist should write a brief letter report for staff that describes the fieldwork and the stratigraphic units observed, that estimates the probable age of those units, that interprets the depositional history of the units, and that assesses the likelihood that the units contain buried archaeological deposits.

    b) Or, please have a trench excavated to the specifications of a professional geoarchaeologist in the part of the proposed project site where project excavations are expected to extend to the greatest depth. Prior to the field work, the geoarchaeologist should conduct background research on the geology and geomorphology of the project area to be able to place the stratigraphic units observed in the trench into a meaningful local sequence. Have the geoarchaeologist record reasonably detailed written descriptions of the lithostratigraphic and pedostratigraphic units in one profile of the trench. The recordation of that profile should include a measured drawing of the profile, a profile photograph with a metric scale and north arrow, and the screening of a small sample (three 5-gallon buckets) of sediment from the major lithostratigraphic or pedostratigraphic units in the profile, or from two arbitrary levels in the profile, through ¼-inch hardware cloth. Soil humate samples for dating the profile's stratigraphic sequence should also be collected, as appropriate. Have the soil humate samples assayed at a professional radiocarbon laboratory, per the geoarchaeologist's instructions, and have the results provided to the geoarchaeologist. The geoarchaeologist should write a brief letter report for staff that describes the

fieldwork and the stratigraphic units observed, estimates the probable age of those units, interprets the depositional history of the units, and assesses the likelihood that the units contain buried archaeological deposits.

BACKGROUND

The AFC indicates that accommodating the additional power output from the proposed project would require modifications to the PG&E Schulte Substation (pp. 3-1–3-2). Staff needs to know whether this structure is 45 years old or older, and so would have to be considered a potential cultural resource subject to impact by the proposed project. If the structure is 45 years old or older, staff additionally needs an assessment of its eligibility for the California Register of Historical Resources (CRHR) and of the impact of the proposed modifications to the structure's integrity.

DATA REQUEST

26. If the Schulte Substation is older than 45 years, please have a qualified architectural historian compile historical information on this structure, make a recommendation on its CRHR-eligibility, and evaluate the impact of the modifications (converting its three-position ring bus to a three-bay, breaker-and-a-half bus configuration) proposed to accommodate the interconnection loop through the 115-kV Tesla-Manteca transmission line.

BACKGROUND

In describing the archaeological survey field methods employed at the locations of the transmission line segments that would be reconductored by the proposed project, the AFC includes inspection of exposed soils and cut banks (AFC, p. 5.3.10). Those field observations would provide staff with a necessary picture of the surface and subsurface soils of the reconductoring area. Consequently, staff requests more detailed information on the soil exposures and profiles that were documented.

DATA REQUESTS

27. On a map, please show the locations of soil profiles observed and noted.
28. Please provide detailed information on the profiles, including section drawings and notes on soil changes and any disturbances.

Technical Area: Geology and Paleontology
Author: Patrick Pilling, Ph.D., P.E., G.E.

BACKGROUND

Site-specific subsurface information is essential to completely evaluate a site with respect to potential geologic hazards and how the existing materials may impact design, construction, and operation of the facility. The information is also useful in establishing the geologic profile with respect to potential paleontological resources. The original AFC for the Tracy Peaker Project, referenced in the subject AFC, references an existing preliminary geotechnical report for the project site (Hultgrens-Tillis Engineers, 2001). In addition, the original AFC indicates that additional geotechnical studies may have been performed for the project (Page 8.15-21, GWF, 2001).

DATA REQUEST

29. Please provide copies of any geotechnical documents that have been completed subsequent to the referenced 2001 Hultgrens-Tillis report and are available for the project.

Technical Area: Land Use
Author: Negar Vahidi

INTRODUCTION

As described in AFC Section 5.6.7.3 (Analysis of Potential Effects on Agriculture), GWF Tracy will be located within the boundaries of the existing Tracy Peaker Plant (TPP)(01-AFC-16) with the exception of the two transmission termination structures, relocation of the stormwater retention basin, relocation of the equipment storage area, and reconductoring of three existing transmission line segments. Similar to the TPP, GWF Tracy will be located within the 40-acre larger property owned by GWF Energy, LLC.

BACKGROUND

According to information provided in the AFC Sections 2.0 (Project Description) and 5.6 (Land Use), staff understands the following regarding project-related land disturbance and/or land conversion:

- 3.28 acres of permanent disturbance to currently undisturbed areas within the 40-acre, GWF-owned parcel where the TPP is currently located;
- 12.3 acres of temporary disturbance for construction laydown and parking on a previously disturbed portion of the 40-acre, GWF-owned parcel; and
- An additional conversion of 3.28 acres of Prime Farmland to non-agricultural uses associated with the relocation of the stormwater retention basin.

Staff also understands that there are other lands (in addition to those described in the list above) that would be affected by the following proposed project features:

- Two transmission termination structures;
- The equipment storage area that would be relocated; and
- The three existing transmission line segments that would be reconductored.

However, the existing land uses and status of lands that would be affected by these project features is unclear.

DATA REQUESTS

30. Please provide information regarding the status of the lands where the project features listed above would be located (i.e., two transmission termination structures, the equipment storage area, and three existing transmission line segments). Specifically, provide information regarding land ownership or easement status of lands that would be affected by the proposed project, and that are not currently owned by GWF Tracy (i.e., outside of the 40-acre TPP parcel).

31. Please describe the activities or existing land uses that currently occur on the lands listed above. In some agricultural zones, agricultural production and activities are allowed within transmission line rights-of-way if the utility operating those lines does not own the lands traversed, but has an easement across them.

Technical Area: Soil and Water Resources
Author: Vince Geronimo

BACKGROUND

Section 5.15.4.2 discusses the surface water hydrology and drainage. The AFC states that the "natural drainage outside of the plant fence line will not be altered." Based on the limited off-site area viewable on Figure 5.15-3a, (and after review of the USGS Tracy, San Joaquin County Quadrangle Map) the area to the south will drain north toward the GWF site. All overland non-contact flow at the GWF site is expected to drain to a permanent stormwater retention facility sized for the 25-year 24-hour rainfall. Staff could not determine why this rainfall intensity and duration was selected.

DATA REQUESTS

32. Please provide a description, including current land use, area, and expected runoff contribution during the 25-year 24-hour rainfall, of all off-site land that currently slopes toward the project's proposed trench drains, shallow ditches, culverts, storm piping system, or onsite stormwater retention facility.
33. Please provide data that describes the percolation rate and typical (winter) evaporation rate expected for the stormwater retention facility.

BACKGROUND

The applicant proposes to use high quality surface water (fresh water) from the Delta-Mendota Canal (DMC) for operation (Section 5.15.4.3). The use of fresh water for GWF Tracy cooling purposes may not be consistent with the Energy Commission's 2003 water conservation policy. The applicant acknowledges the Energy Commission's water conservation policy and considers the use of fresh water to be consistent with this policy because, as stated in the AFC,

> " … it would be economically infeasible for the project to construct a pipeline to utilize wastewater from the Tracy Wastewater Treatment Plant. In addition, the construction of such a pipeline and related water supply infrastructure could significantly increase environmental impacts related to water quality, air quality, soils, traffic, and biological resources."

The applicant's contention that the infrastructure required to deliver recycled water to GWF Tracy is "environmentally undesirable and economically unsound" has not been substantiated through the presentation of, or reference to, environmental and economic studies that are required by the Energy Commission's water conservation policy.

DATA REQUESTS

34. Please substantiate the position state in the AFC that recycled water from the Tracy Wastewater Treatment Plant is environmentally undesirable or economically unsound.

BACKGROUND

Section 5.15.6 Cumulative Effects, describes the stormwater's "gradual release into the storm drain system." According to Section 5.15.3.3.2 the stormwater will percolate or evaporate from the proposed retention pond.

DATA REQUEST

35. Please clarify what the potential cumulative effects are for stormwater that drains into the proposed retention pond.

Water Supply

In the Data Adequacy Supplement, Page 32, states the current annual allocation of water from the Byron Bethany Irrigation District is 136 acre-feet associated with the 40-acre GWF parcel. This allocation is subject to the U.S. Bureau of Reclamation (Bureau) declaring a 100 percent availability of water. During droughts or other years in which the Bureau is unable to provide the full contract amount the allocation may be less than 136 acre-feet and possibly less than the average annual water consumption of 54.4 acre-feet.

DATA REQUESTS

36. Please provide data showing annual water usage since the start of TPP operations. Identify any years where the Bureau apportioned less than the 100 percent availability and identify whether this impacted plant operations.
37. Please identify how operations would change with an annual allocation less than the anticipated average annual water consumption.

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 GWF COMBINED CYCLE MBINED CYCLE POWER PLANT PROJECT**	**Docket No. 08-AFC-7** **PROOF OF SERVICE**

INSTRUCTIONS: All parties shall either (1) send an original signed document plus 12 copies or (2) mail one original signed copy AND e-mail the document to the address for the Docket as shown below, AND (3) all parties shall also send a printed or electronic copy of the document, which includes a proof of service declaration to each of the individuals on the proof of service list shown below:

CALIFORNIA ENERGY COMMISSION
Attn: Docket No. 01-AFC-16
1516 Ninth Street, MS-15
Sacramento, CA 95814-5512
docket@energy.state.ca.us

APPLICANT

Doug Wheeler, Vice President
GWF Energy, LLC
4300 Railroad Avenue
Pittsburg, CA 94565
dwheeler@gwfpower.com

APPLICANT'S CONSULTANTS

Jerry Salamy, Consultant
Senior Project Manager, CH2M HILL
2485 Natomas Park Drive
Sacramento, CA 95833
Jerry.Salamy@CH2M.com

David A. Stein, P.E.
Vice President, Industrial Systems, CH2M HILL
155 Grand Avenue, Suite 1000
Oakland, CA 94512
dstein@ch2m.com

COUNSEL FOR APPLICANT

Michael J. Carroll
Latham & Watkins, LLP
650 Town Center Drive, 20th Floor
Costa Mesa, CA 92626-1925
michael.carroll@lw.com

INTERESTED AGENCIES

California ISO
P.O. Box 639014
Folsom, CA 95763-9014
e-recipient@caiso.com

INTERVENORS

ENERGY COMMISSION

KAREN DOUGLAS
Commissioner and Presiding Member
KLdougla@energy.state.ca.us

ARTHUR H. ROSENFELD
Commissioner and Associate Member
arosenfe@energy.state.ca.us

Raoul Renaud
Hearing Officer
rrenaud@energy.state.ca.us

Christopher Meyer
Project Manager
cmeyer@energy.state.ca.us

Kerry Willis
Staff Counsel
kwillis@energy.state.ca.us

Elena Miller
Public Adviser's Office
publicadviser@energy.state.ca.us

DECLARATION OF SERVICE

I, April Albright, declare that on October 21, 2008, I deposited copies of the attached GWF Tracy Combined Cycle Power Plant Project (08-AFC-7) – Data Requests Set 1 (#s 1-37), in the United States mail at Sacramento, CA 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.

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

Original signature in Dockets
APRIL ALBRIGHT

Attachment