

LATHAM & WATKINS LLP

650 Town Center Drive, 20th Floor
Costa Mesa, California 92626-1925
Tel: +1.714.540.1235 Fax: +1.714.755.8290
www.lw.com

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February 28, 2011

VIA FEDEX

CALIFORNIA ENERGY COMMISSION
Attn: Docket No. 08-AFC-9
1516 Ninth Street, MS-4
Sacramento, California 95814-5512

File No. 039610-0003

DOCKET

08-AFC-9

DATE	FEB 28 2011
RECD.	FEB 28 2011

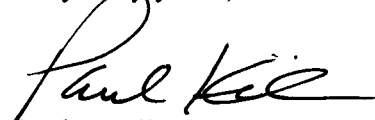
Re: City of Palmdale Hybrid Power Plant Project: Docket No. 08-AFC-9

Dear Sir/Madam:

Pursuant to California Code of Regulations, title 20, Sections 1209, 1209.5, and 1210, enclosed herewith for filing please find Applicant's Identification of "Preferred" Road Segments for Paving.

Please note that the enclosed submittal was filed today via electronic mail to your attention and to all parties on the attached proof of service list.

Very truly yours,


Paul E. Kihm
Senior Paralegal

Enclosure

cc: 08-AFC-9 Proof of Service List (w/encl., via e-mail and U.S. Mail)
Michael J. Carroll, Esq. (w/encl.)
Marc T. Campopiano, Esq. (w/encl.)

Michael J. Carroll
Marc T. Campopiano
LATHAM & WATKINS LLP
650 Town Center Drive, Suite 2000
Costa Mesa, CA 92626
(714) 755-8105

STATE OF CALIFORNIA
ENERGY RESOURCES
CONSERVATION AND DEVELOPMENT COMMISSION

IN THE MATTER OF:) DOCKET NO. 08-AFC-9
)
APPLICATION FOR CERTIFICATION,) IDENTIFICATION OF "PREFERRED"
FOR THE PALMDALE HYBRID POWER) ROAD SEGMENTS FOR PAVING
PROJECT BY THE CITY OF PALMDALE)
)
)
_____)

In its Application for Certification filed in July of 2008, the City of Palmdale ("Applicant") for the Palmdale Hybrid Power Plant Project (08-AFC-9) ("PHPP"), proposed the paving of currently unpaved roads to generate PM10 emission reduction credits ("ERCs") to satisfy new source review offsetting requirements. On May 1, 2009, in response to California Energy Commission ("CEC") Staff Data Request No. 103, Applicant identified eleven potential road segments for generation of PM10 ERCs. The eleven identified road segments was more than Applicant believed would be necessary to generate the required quantity of PM10 ERCs. On February 11, 2011, in response to concerns expressed by the Antelope Valley Conservancy, Applicant eliminated Barrel Springs Road from the list of potential road segments.

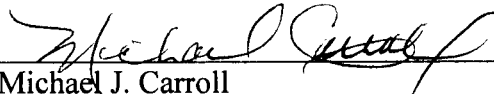
Applicant believes that, with implementation of CEC Staff proposed conditions of certification, all of the remaining ten road segments could be paved without significant unmitigated environmental impacts. However, the ten remaining road segments continues to be more than is necessary to generate the required quantity of PM10 ERCs for the PHPP. Therefore, in response to concerns raised by the interveners Center for Biological Diversity and Desert Citizens Against Pollution, Applicant is now identifying a list of five "preferred" road segments. The five preferred segments are those for which paving will most clearly not result in adverse environmental impacts, including growth inducing impacts. In the absence of unforeseen circumstances, Applicant will select from this preferred list of roads for paving (subject to final analysis of the physical characteristics of the road segments, it is likely that only four of the five will need to be paved). The list of preferred road segments is provided below, and shown on the accompanying map.

Preferred Road Segments for Generation of PM10 ERCs

Street	From	To
Avenue N-8	Bolz Ranch Road	30 th Street West
40 th Street West	Avenue N	Avenue N-8
Avenue T-10	87 th Street East	96 th Street East
Avenue S-6	96 th Street East	106 th Street East
Avenue S-2	96 th Street East	106 th Street East

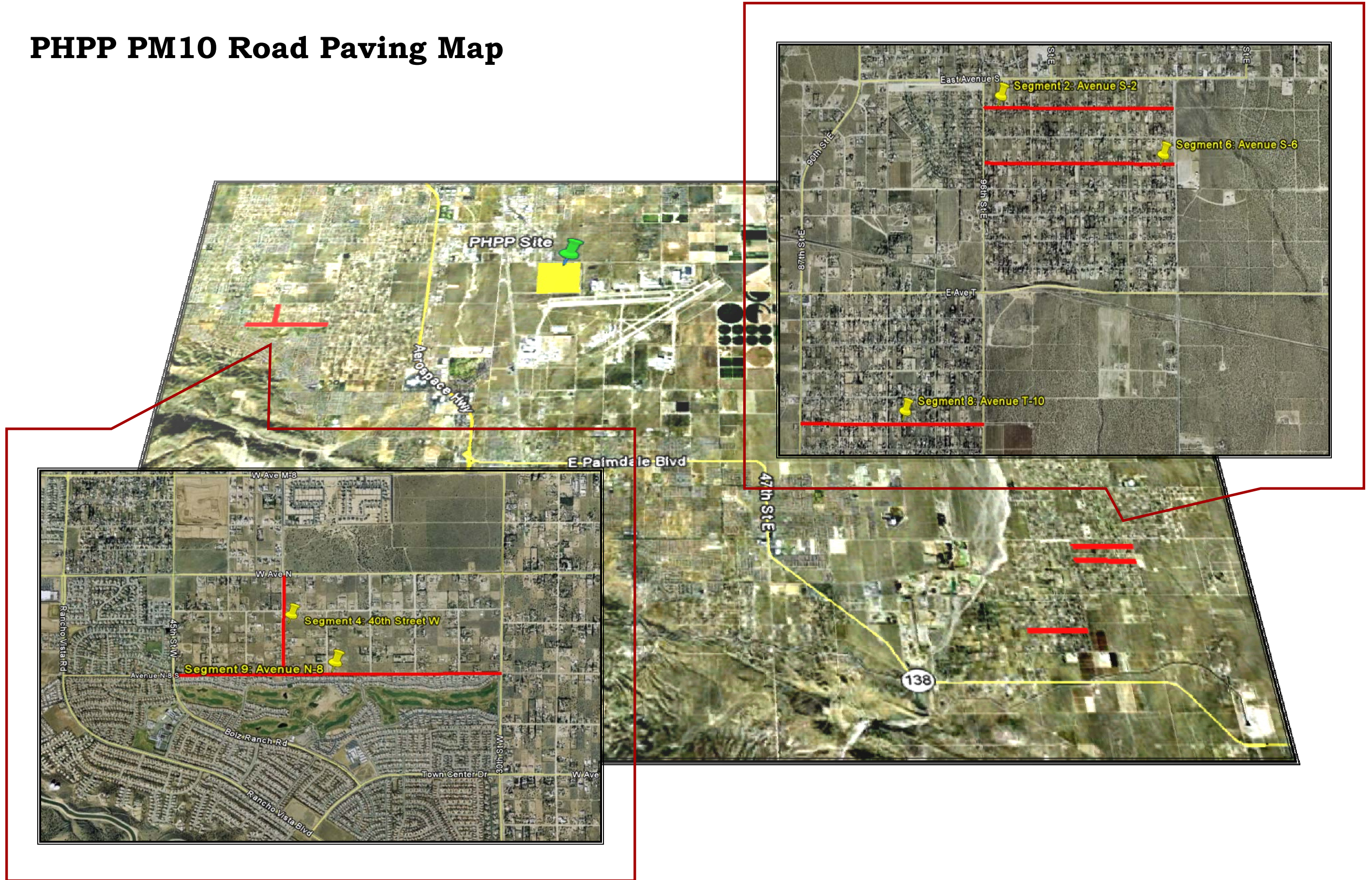
DATED: February 28, 2011

Respectfully submitted,



Michael J. Carroll
LATHAM & WATKINS LLP

PHPP PM10 Road Paving Map



**STATE OF CALIFORNIA
ENERGY RESOURCES
CONSERVATION AND DEVELOPMENT COMMISSION**

In the Matter of:)	Docket No. 08-AFC-9
)	
Application for Certification,)	PROOF OF SERVICE
for the CITY OF PALMDALE HYBRID)	
POWER PLANT PROJECT)	(Revised February 25, 2011)
)	
)	

APPLICANT

Thomas M. Barnett
Executive Vice President
Inland Energy, Inc.
3501 Jamboree Road
South Tower, Suite 606
Newport Beach, CA 92660
tbarnett@inlandenergy.com

Antonio D. Penna Jr.
Vice President
Inland Energy
18570 Kamana Road
Apple Valley, CA 92307
tonypenna@inlandenergy.com

Laurie Lile
Assistant City Manager
City of Palmdale
38300 North Sierra Highway, Suite A
Palmdale, CA 93550
llile@cityofpalmdale.org

APPLICANT'S CONSULTANTS

Sara Head
Vice President
AECOM
1220 Avenida Acaso
Camarillo, CA 93012
Sara.Head@aecom.com

PALMDALE HYBRID POWER PROJECT
CEC Docket No. 08-AFC-09

INTERESTED AGENCIES

Ronald E. Cleaves, Lt. Col, USAF

Commander ASC Det 1 Air Force Plant 42
2503 East Avenue P
Palmdale, CA 93550
Ronald.Cleaves@edwards.af.mil

Erinn Wilson

Staff Environmental Scientist
California Department of Fish and Game
18627 Brookhurst Street, #559
Fountain Valley, CA 92708
E-mail Service Preferred
EWilson@dfg.ca.gov

Richard W. Booth

Sr. Geologist
Lahontan Regional
Water Quality Control Board
2501 Lake Tahoe Blvd.
South Lake Tahoe, CA 96150-2306
rbooth@waterboards.ca.gov

Rick Buckingham

State Water Project
Power & Risk Office
3310 El Camino Avenue, LL-90
Sacramento, CA 95821
E-mail Service Preferred
rbucking@water.ca.gov

Manuel Alvarez

SoCal Edison
1201 K Street
Sacramento, CA 95814
Manuel.Alvarez@sce.com

Robert C. Neal, P.E.

Public Works Director
City of Lancaster
44933 Fern Avenue
Lancaster, CA 93534-2461
rneal@cityoflancasterca.org

PALMDALE HYBRID POWER PROJECT
CEC Docket No. 08-AFC-09

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

Robert J. Tucker
SoCal Edison
1 Innovation Drive
Pomona, CA 91768
Robert.Tucker@sce.com

Christian Anderson
Air Quality Engineer
Antelope Valley AQMD
43301 Division St, Suite 206
Lancaster, CA 93535
E-mail Service Preferred
canderson@avaqmd.ca.gov

Keith Roderick
Air Resources Engineer
Energy Section/Stationary Sources
California Air Resources Board
P.O. Box 2815
Sacramento, California 95812
E-mail Service Preferred
kroderic@arb.ca.gov

INTERVENORS

Lisa T. Belenky, Senior Attorney
John Buse, Senior Attorney
Center for Biological Diversity
351 California St., Suite 600
San Francisco, CA 94104
E-mail Service Preferred
lbelenky@biologicaldiversity.org
jbuse@biologicaldiversity.org

Jane Williams
Desert Citizens Against Pollution
E-mail Service Preferred
dcapjane@aol.com

PALMDALE HYBRID POWER PROJECT
CEC Docket No. 08-AFC-09

ENERGY COMMISSION

Karen Douglas

Commissioner and Presiding Member
CALIFORNIA ENERGY COMMISSION
1516 Ninth Street
Sacramento, California 95814-5512
kldouglas@energy.state.ca.us

James D. Boyd

Vice Chair and Associate Member
CALIFORNIA ENERGY COMMISSION
1516 Ninth Street
Sacramento, California 95814-5512
jboyd@energy.state.ca.us

Ken Celli

Hearing Officer
CALIFORNIA ENERGY COMMISSION
1516 Ninth Street
Sacramento, California 95814-5512
kcelli@energy.state.ca.us

Galen Lemei

Advisor to Commissioner Douglas
E-mail Service Preferred
glemei@energy.state.ca.us

Tim Olson

Advisor to Commissioner Boyd
E-mail Service Preferred
tolson@energy.state.ca.us

Felicia Miller

Project Manager
CALIFORNIA ENERGY COMMISSION
1516 Ninth Street
Sacramento, California 95814-5512
fmiller@energy.state.ca.us

PALMDALE HYBRID POWER PROJECT
CEC Docket No. 08-AFC-09

Lisa DeCarlo
Staff Counsel
CALIFORNIA ENERGY COMMISSION
1516 Ninth Street
Sacramento, California 95814-5512
ldecarlo@energy.state.ca.us

Jennifer Jennings
Public Adviser
E-mail Service Preferred
Publicadviser@energy.state.ca.us

DECLARATION OF SERVICE

I, Paul Kihm, declare that on February 28, 2011, I served and filed copies of the attached document to all parties identified on the Proof of Service List above in the following manner:

IDENTIFICATION OF "PREFERRED" ROAD SEGMENTS FOR PAVING

California Energy Commission

- Transmission via electronic mail and by depositing a copy with FedEx overnight mail delivery service at Costa Mesa, California, with delivery fees thereon fully prepaid and addressed to the following:


CALIFORNIA ENERGY COMMISSION
Attn: DOCKET NO. 08-AFC-09
1516 Ninth Street, MS-4
Sacramento, California 95814-5512
docket@energy.state.ca.us

For Service to All Other Parties

- Transmission via electronic mail to all email addresses on the Proof of Service list; and
- by depositing one paper copy with the United States Postal Service via first-class mail at Costa Mesa, California, with postage fees thereon fully prepaid and addressed as provided on the Proof of Service list to those addresses **NOT** marked "email preferred."

I further declare that transmission via electronic mail and U.S. Mail was consistent with the requirements of California Code of Regulations, title 20, sections 1209, 1209.5, and 1210.

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 28, 2011, at Costa Mesa, California.



Paul Kihm