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

August 28, 2009

DOCKET
09-AFC-1
DATE AUG 28 2009
RECD. SEP 01 2009

Mr. Ross Metersky
BP Alternative Energy NA Inc.
700 Louisiana Street, 33rd Floor
Houston, Texas 77002

RE: WATSON COGENERATION ELECTRIC AND STEAM RELIABILITY PROJECT (BP Watson) (09-AFC-1)
DATA REQUEST SET 1 (#s 1-39)

Dear Mr. Metersky:

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 (#s 1-39) is being made in the areas of Air Quality (#s 1-9), Public Health (#s 10-13), Socioeconomics (#s 14-15), Soil and Water Resources (#s 16-32), Visual Resources (#s 33-34), and Waste Management (#s 35-39). Written responses to the enclosed data requests are due to the Energy Commission staff on or before September 28, 2009, 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, please 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, 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) 653-8236 or email me at asolomon@energy.state.ca.us. Kevin Le of the Siting project management staff is working with me on this project. He is also available to respond to questions at (916) 651-2902 or by email at kle@energy.state.ca.us.

Sincerely,

Alan Solomon
Project Manager

Enclosure

Technical Area: Air Quality
Author: Steve Radis

BACKGROUND: OPERATIONS MITIGATION – EMISSION REDUCTION CREDITS

Staff's position for determining the impact of operating emissions per the California Environmental Quality Act (CEQA), is that all nonattainment pollutants and their precursors need to be mitigated through emission reductions at a minimum ratio of 1:1, with larger ratios required for inter-pollutant, inter-basin and distant Emission Reduction Credit (ERC) sources. The South Coast Air Basin in the area of the project site is classified as nonattainment for the state and federal ozone and PM10 standards. Without proper emission reduction mitigation, this project could contribute to existing violations of the state and federal ambient air quality standards.

The applicant has proposed to utilize VOC ERCs from existing refinery holdings or purchased on the open market. NOX and SOx RECLAIM Trading Credits (RTCs) are also proposed from the existing refinery allocation or additional RTCs will be acquired.

DATA REQUESTS

1. Please identity ERCs owned by the applicant or any affiliate that might be utilized to offset facility expansion emission increases. Please include the ERC number, the pollutant type and amount in pounds per day, and ERC source location and name.
2. Please provide a list of NOx and SOx RECLAIM trading credits (RTCs) that the applicant owns or has under option contract.
3. Please provide option contracts and/or evidence of acquisition of ERCs for the NOx, SOx, VOC and PM10 liability of the project.
4. If the applicant is unable to adequately respond to the Data Request above, please provide a status report starting October 1, 2009 and continuing monthly until the report identifies option contracts and/or evidence of acquisition of ERCs for the NOx, SOx, VOC and PM10 liability of the project, or the start of project Air Quality Evidentiary Hearings. The report should be specific to each pollutant and provide new information and update information from previous monthly status reports as appropriate. The reports should include:
    a. contact names and telephone numbers;
    b. company or source names;
    c. pollutant credit types and amounts in Ibs/day;
    d. ERC certificate numbers;
    e. the methods of emission reductions (e.g., shutdown, reduction of hours of operation, emission controls, etc.);
    f. the status of ERC or option negotiations;
    g. prices or potential prices; and,
    h. the location of the emission reduction credits.

BACKGROUND: PM10/PM2.5 OFFSET STRATEGY

The applicant has proposed to use the existing PM10/PM2.5 emission limit for the four existing turbine/HSRG units to cover the fifth unit proposed as part of this project. Under CEQA the baseline is normally defined as the conditions that exist at the time of the Notice of Preparation, or in this case, the Application for Certification (AFC). For air pollutant emissions, baseline conditions are typically defined as the average emissions over the preceding three year period. For CEQA impact analysis purposes, potential impacts of the proposed project would be based on the net emission increase of facility operations above this baseline. Should emissions associated with the proposed project result in increased emissions over the CEQA baseline, additional mitigation would be required.

It is unclear what, if any, PM10 emission offsets were utilized when the original four turbine/HSRG units were permitted. If PM10 offsets were utilized during the original project permitting in the 1980s, there may be little benefit in relation to the current CEQA baseline.

DATA REQUESTS

5. Please provide historical PM10/PM2.5 emissions for the three years preceding the submittal of the AFC for this project, presumably covering the period of 2006 through 2008.
6. Please provide documentation on what PM10 offsets were utilized, if any, when the original cogeneration facility was constructed.
7. Should the project result in an increase in PM10/PM2.5 emissions over the CEQA baseline, as defined above, please provide information on what additional measures would be needed to result in a zero increase in PM10/PM2.5 emissions and/or a net air quality benefit associated with the proposed project.

BACKGROUND: AIR QUALITY PERMIT APPLICATION

A Determination of Compliance (DOC) analysis from the South Coast Air Quality Management District (SCAQMD or "District") will be needed for staff's analysis. Staff will need to coordinate with the District to keep apprised of any air quality issues determined by the District during their permit review.

DATA REQUESTS

8. Please provide copies of any permit application materials, other than AFC materials, submitted to the District.
9. Please provide copies of any subsequent submittals to the District within 5 days of their submittal to the District.

Technical Area: Public Health
Author: Dr. Alvin Greenberg

BACKGROUND

AERMOD is a model used to assess air dispersion and On-Ramp is used to convert AERMOD output to a format that can be used in Hotspots Analysis and Reporting Program (HARP) to assess cancer risk and chronic and acute impacts for this proposed project. In order to properly evaluate the modeling effort, the modeling file CD, containing air quality and public health modeling files, including the HARP transaction file (.tra), is required.

DATA REQUEST

10. Please provide the modeling file CD containing air quality and public health modeling files. Specifically, please include the HARP transaction file (.tra) and/or the following information that was used in the HARP modeling:
    - Stack parameters and locations in Universal Transverse Mercator (UTM) coordinates; and
    - Information on Project buildings and tanks used in building downwash analysis (locations in UTM coordinates and dimensions).

BACKGROUND

The AFC does not discuss existing health concerns and the applicant's Data Adequacy sheet stated that no studies were identified. Although that may be true for the city of Carson, staff doubts that there are no health studies for the Los Angeles Basin area which includes the cities of Carson, Torrance, Lomita, and Long Beach. Staff needs these studies in order to access the potential incremental and cumulative impacts on public health.

Also, the AFC does not contain a cumulative human health risk assessment. The AFC states that the project impacts are too little to contribute to any cumulative impact. While this may ultimately prove to be true, staff has found that cumulative impacts are possible when sources are very close to one another, say within a few blocks. Given the proximity of the BP Carson refinery and other large industrial emission sources in the Carson/Wilmington area, this project meets that criteria and thus staff needs to have a quantitative cumulative health risk assessment conducted to ensure that cumulative impacts on public health are indeed less than significant.

DATA REQUESTS

11. Please provide a discussion describing existing health concerns and disease incidence rates (cancer, asthma, respiratory disease, cardiovascular disease) in the surrounding area or in the portion of the Los Angeles basin that includes the location of the proposed power plant.
12. Please provide a cumulative health risk assessment for the combined emissions from the project expansion and the existing Watson power plant and refinery.

BACKGROUND

The AFC did not provide a health risk assessment for the diesel emissions from construction activities nor did it provide diesel particulate matter (DPM) emission factors for the equipment that will be used. While staff understands that project construction emissions are short-term and may indeed pose an insignificant risk to public health as the AFC states, staff needs to verify this by reviewing the DPM emission factors and health risk assessment for construction activities.

DATA REQUEST

13. Please provide a health risk assessment for diesel construction equipment emissions.

Technical Area: Socioeconomics
Author: Joseph Diamond Ph. D.

BACKGROUND

In the socioeconomic section of the BP Watson Project's AFC, IMPLAN model estimates for secondary (indirect and induced) economic impacts for construction were reported in 2008 dollars. Staff needs to know the year that corresponds to all dollar estimates. The time value of money should be reflected for all economic estimates.

DATA REQUEST

14. Please verify the year for all economic estimates (e.g., construction cost, construction and operation payroll, property taxes, school impact fees, etc.) and IMPLAN construction and operation economic impacts which include secondary economic impacts.

BACKGROUND

Staff needs to know more information on the construction and operation IMPLAN economic impact estimates for the BP Watson Project in Los Angeles County for completion of its an analysis.

DATA REQUEST

15. Please provide the direct economic impacts used in the IMPLAN estimates that were used to calculate the secondary impacts for labor income and output.

Technical Area: Soils and Water Resources
Authors: Mark Lindley, P.E.

PROJECT BACKGROUND

The BP Watson Project proposes to expand an existing 385-megawatt (MW) cogeneration facility within the BP Carson refinery that has been in operation since 1988. The proposed expansion includes addition of one 85 MW General Electric combustion gas turbine (CTG) with a heat recovery steam generator (HRSG) to provide additional process steam to the BP Carson refinery. The proposed additional CTG and HRSG would be constructed onsite adjacent to the four existing CTG and HRSG systems and would encompass the "fifth train" intended to operate in parallel with the four existing generating trains. The proposed project is intended to improve the efficiency of the Watson cogeneration facility as well as improve the reliability of steam deliveries to the BP Carson refinery.

Related to water resources, the proposed project also includes an inlet fogging system, a boiler feedwater pump, circulating water pump, and two additional cells added to an existing cooling tower. Water supply will be provided by reclaimed water from the the West Basin Water Treatment Plant via existing piping systems. Wastewater from power plant processes and stormwater runoff will be delivered to the BP Carson refinery's existing oily water system and ultimately discharged to the Los Angeles Sanitation District via existing pipeline connections under BP Carson's existing waste discharge requirements.

BACKGROUND

WATER SUPPLY

Watson proposes to utilize tertiary-treated recycled water for water used in the evaporative cooling towers and for all plant makeup water. The recycled water will be supplied by the West Basin Water Treatment Plant, via an existing piping connection. The AFC indicates that the existing four-train Watson cogeneration plant utilizes about 4,606 acre-feet per year (afy), with 3,073 afy provided by municipal supply from the California Water Services Company and 1,534 afy from an on-site well. The AFC also indicates that the proposed fifth train would require about 3,015 afy of additional water. It is not clear if all of the water supply for the Watson cogeneration facility is to be converted to reclaimed water. The proposed fifth train would require about 35.5 afy per MW of capacity, which is a relatively inefficient use of water given the plant output.

A will-serve letter from the BP Carson refinery indicates that the refinery will be able to provide sufficient reclaimed water for the existing Watson cogeneration facility and additional reclaimed water for the proposed fifth train. A Memorandum of Understanding between the West Basin Municipal Water District and the BP Carson Refinery indicates that approximately 5,806 afy of reclaimed water may be supplied to the BP Carson Refinery. Staff needs additional information to confirm that the West Basin Municipal Water District can provide an adequate, reliable water supply to meet the peak demands at the Watson cogeneration facility and to ensure that the project can operate reliably.

DATA REQUESTS

16. Please confirm the proposed water supply required for the Watson cogeneration facility including the proposed fifth train.

17. Please provide a summary of the proposed annual water supply requirements for the existing four-train Watson cogeneration facility, the proposed fifth train, and the total. Please break down the portions of the proposed annual supply to be provided by reclaimed water, groundwater, and municipal water following completion of the proposed expansion.

18. Please provide details on other water supply streams associated with the BP Carson refinery that will be provided by reclaimed water, groundwater, and municipal water.

19. Please confirm that the 5,806 afy of reclaimed water provided by the West Basin Water District is adequate to meet the water supply requirements of the Watson cogeneration facility including the proposed fifth train and other water supply requirements associated with the BP Carson refinery.

20. If the Watson Cogeneration facility proposes to continue to rely on groundwater for a portion of the existing facility's water supply, please provide a detailed discussion regarding the availability and feasibility of replacing the existing groundwater supply with additional reclaimed water supply.

21. Please provide a monthly estimate of steam requirements at the adjacent BP Carson refinery.

22. a. Please address whether water use and power output at the Watson cogeneration facility including the proposed fifth train will be regulated to match steam requirements at the adjacent refinery.

    b. Please provide a detailed discussion regarding the feasibility of regulating water use and power output and methods to minimize water use to match the requirements at the adjacent refinery.

23. Please confirm that the proposed reclaimed water supply will be available prior to operation of the proposed fifth train. Please provide a current timeline for implementation of the reclaimed water supply connections.

BACKGROUND

WATER TREATMENT

The Watson Cogeneration plant plans to utilize reclaimed water from the West Basin Water Treatment Plant. The reclaimed water is to be tertiary treated recycled water treated to California Title 22 regulations for industrial reuse.

Under California Code of Regulations (CCR) Title 22, either the applicant or the West Basin Municipal Water District will be required to prepare an Engineer's Report for the production, distribution, and use of recycled water at the Watson Cogeneration plant and to obtain review and comment from the State Department of Public Health (DPH) and the Regional Water Quality Control Board (RWQCB) which typically approves uses of recycled and reclaimed water.

The production and use of recycled water is regulated under federal and state law. The State Water Resources Control Board (SWRCB) shares jurisdiction with the RWQCBs and DPH over the production and use of recycled water. The SWRCB exercises general oversight over recycled water projects, while DPH is charged with the protection of public health and drinking water supplies through the development of uniform water recycling criteria. Under California Water Code, sections 13522.5, 13523, and 13523.1, any person who proposes to produce or use recycled water must file a report and obtain water reclamation requirements or a master reclamation permit from the appropriate RWQCB.

One of the primary conditions for the use of recycled water is protection of public health. The current Water Recycling Criteria (Title 22, CCR, sections 60301 through 60355) require the submission of an engineering report to the RWQCB and DPH before recycled water projects are implemented. In addition, Title 17, California Code of Regulations addresses the health and safety requirements of backflow prevention and prohibits cross connection of potable and non-potable water lines.

DATA REQUESTS

24. Please discuss whether the applicant or the West Basin Municipal Water District will be obtaining approval from the DPH and RWQCB related to the Title 22 requirements.

25. Please provide documentation showing the applicant has established contact with DPH and RWQCB notifying them that the applicant proposes to treat and use recycled water for project operation. If the applicant has already contacted these agencies regarding their proposed treatment and use, please provide copies of any correspondence.

BACKGROUND

Wastewater Disposal and Stormwater Runoff

The Watson Cogeneration project proposes to discharge all project wastewater and stormwater runoff to the adjacent BP Carson refinery oily water disposal system. The average daily wastewater discharge rate is expected to be about 0.12 million gallons per day (mgd) and daily maximum is expected to be about 0.17 mgd. The oily water

treatment system includes treatment processes to remove free oil and suspended solids which are reclaimed and processed within the refinery. Solids remaining after hydrocarbon recovery are disposed at a Resource Conservation Recovery Act (RCRA) spell this out approved facility. Treated wastewater is discharged to the Los Angeles County Sanitation District's joint treatment facility in the City of Carson. This wastewater discharge is regulated by the terms of a waste discharge permit issued by the Los Angeles County Sanitation District.

DATA REQUESTS

26. Please provide a detailed description of the treatment processes and storage capacity included in the BP Carson refinery's oily water treatment system.

27. Please describe all waste streams (discharge flow rates, daily volumes, and origins) that are directed to the oily water treatment system.

28. Please provide detailed runoff calculations estimating peak discharge for 10-year and 100-year rainfall events and runoff volumes for 10-year and 100-year, 24-hour rainfall events for areas within the Watson cogeneration plant (existing and with the proposed expansion).

29. Please demonstrate that the existing BP Carson refinery's oily water treatment system has sufficient capacity to treat all wastewater streams and stormwater runoff from the Watson cogeneration plant (existing and with the proposed expansion).

30. Please provide water quality sample results for wastewater discharge from the oily water treatment system.

31. Please provide the waste discharge requirements including limits on discharge flow rates and water quality included in the waste discharge permit issued by the Los Angeles County Sanitation District.

BACKGROUND

Stormwater

The BP Watson project site is located within an existing berm to prevent run-on from adjacent areas and runoff from the project site. Runoff will be collected in an existing sump and discharged to the BP Carson refinery oily water treatment system. Prior to construction, a construction phase Stormwater Pollution Prevention Plan (SWPPP) will be required. Best Management Practices will be employed to minimize impacts to stormwater during construction. The Energy Commission also requires preparation and implementation of a detailed Drainage, Erosion, and Sediment Control Plan to protect soil and water resources during construction and operation of the proposed project.

DATA REQUESTS

32. Please provide a draft Drainage Erosion and Sediment Control Plan (DESCP) containing elements A through I below outlining site management activities and

erosion/sediment control BMPs to be implemented during site mobilization, excavation/demolition, construction, and post-construction activities. The level of detail in the draft DESCP should be commensurate with the current level of planning for site grading and drainage. Please provide all conceptual erosion control information for those phases of construction and post-construction that have been developed or provide a statement when such information will be available. The DESCP may be combined with the SWPPP required by the Regional Water Quality Control Board to limit the need for the project to develop separate stormwater management plans.

A. **Vicinity Map** – A map(s) at a minimum scale 1"=100' will be provided indicating the location of all project elements (construction site, laydown area, pipelines, etc.) with depictions of all significant geographic features including swales, storm drains, and sensitive areas.

B. **Site Delineation** – All areas subject to soil disturbance for BP Watson (project site, laydown area, all linear facilities, landscaping areas, and any other project elements) shall be delineated showing boundary lines of all construction/demolition areas and the location of all existing and proposed structures, pipelines, roads, and drainage facilities.

C. **Watercourses and Critical Areas** – The DESCP shall show the location of all nearby watercourses including swales, storm drains, and drainage ditches. Indicate the proximity of those features to the BP Watson construction, laydown, and landscape areas and all transmission and pipeline construction corridors.

D. **Drainage Map** – The DESCP shall provide a topographic site map(s) at a minimum scale 1"=100' showing all existing, interim and proposed drainage systems and drainage area boundaries. On the map, spot elevations are required where relatively flat conditions exist. The spot elevations and contours shall be extended off-site for a minimum distance of 100 feet in flat terrain.

E. **Narrative of Project Site Drainage** – The DESCP shall include a narrative of the drainage measures to be taken to protect the site and downstream facilities. The narrative should include the summary pages from the hydraulic analysis prepared by a professional engineer/erosion control specialist. The narrative shall state the watershed size(s) in acres that was used in the calculation of drainage measures. The hydraulic analysis should be used to support the selection of BMPs and structural controls to divert off-site and on-site drainage around or through the BP Watson construction and laydown areas.

F. **Clearing and Grading Plans** – The DESCP shall provide a delineation of all areas to be cleared of vegetation and areas to be preserved. The plan shall provide elevations, slopes, locations, and extent of all proposed grading as shown by contours, cross sections or other means. The locations of any disposal areas, fills, or other special features will also be shown. Illustrate

existing and proposed topography tying in proposed contours with existing topography.

G. **Clearing and Grading Narrative** – The DESCP shall include a table with the quantities of material excavated or filled for the site and all project elements of the CPVVS project (project site, lay down area, transmission corridors, and pipeline corridors) whether such excavations or fill is temporary or permanent, and the amount of such material to be imported or exported.

H. **Best Management Practices Plan** – The DESCP shall identify on the topographic site map(s) the location of the site specific BMPs to be employed during each phase of construction (initial grading/demolition, project element excavation and construction, and final grading/stabilization). BMPs shall include measures designed to prevent wind and water erosion.

I. **Best Management Practices Narrative** – The DESCP shall show the location (as identified in H above), timing, and maintenance schedule of all erosion and sediment control BMPs to be used prior to initial grading, during all project element (site, pipelines, etc.) excavations and construction, final grading/stabilization, and post-construction. Separate BMP implementation schedules shall be provided for each project element for each phase of construction. The maintenance schedule should include post-construction maintenance of structural control BMPs, or a statement provided when such information will be available.

Technical Area: Visual Resources – Visible Plume
Author: William Walters

EXISTING COOLING TOWER OPERATIONS

BACKGROUND

Staff plans to perform a plume modeling analysis for the cooling tower. The applicant has provided adequate operating data for staff to assess the two new cooling tower cells that will be added to the existing cooling tower, but did not provide a fogging frequency curve that staff uses to check modeling results. Additionally, the applicant did not provide any indication if the existing 5 cells operate with the same general heat balance characteristics as the new cells. Staff requires additional information for the two new cooling tower cells and an explanation of the design of the existing cooling tower in order to complete our plume modeling analysis.

DATA REQUESTS

33. Please provide an indication of whether the existing cooling tower cells will operate with a heat balance (exhaust temperatures) similar to the two new cooling tower cells required for the project. If the design/operation is not similar please provide existing cooling tower operating data similar to that what was provided for the two new cooling tower cells in the Supplement in Response to Data Adequacy review (Appendix E, Table E-1).

34. Please provide a fogging frequency curve from the cooling tower vendor, if available, for the existing cooling tower, and if designed/operated differently, for the two new cells being added to the cooling tower.

Technical Area: Waste Management
Author: Ellie Townsend-Hough

BACKGROUND

The Integrated Waste Management Act of 1989 (AB 939) established landfill waste diversion goals of 50 percent by the year 2000 for state and local jurisdictions. To meet the solid waste diversion goals, many local jurisdictions have implemented Construction and Demolition Waste Diversion Programs.

DATA REQUESTS

35. Please indicate whether Los Angeles County operates a Construction and Demolition Waste Diversion Program.

36. Please provide information on how the BP Watson Project will meet each of the requirements of the program cited in the previous data request.

BACKGROUND

For any site in California proposed for the construction of a power plant, the applicant must provide documentation about the nature of any potential or existing releases of hazardous substances or contamination at the site. If potential or existing releases or contamination at the site are identified, the significance of the release or contamination would be determined by site-specific factors, including, but not limited to: the amount and concentration of contaminants or contamination; the proposed use of the area where the contaminants/contamination is found; and any potential pathways for workers, the public, or sensitive species or environmental areas to be exposed to the contaminants (Siting Regulations Appendix B (g)(12)(A)).

The Phase I Environmental Site Assessment (ESA) for the project identified Recognized Environmental Conditions (RECs). Typically, where RECs are identified a Phase II ESA, is conducted to further evaluate whether there may be harmful contaminants on the site. Staff believes that given these past land uses and proposed construction the project owner should verify that no harmful concentrations of any contaminants will be encountered at the proposed project site.

There will be demolition of an existing warehouse/maintenance shop and ground disturbance during project construction. To protect the workers and reduce/eliminate damage to the environment the project owner shall verify that no harmful concentrations of any contaminant will be encountered at the proposed project site.

DATA REQUESTS

37. a. Please provide results of Phase II ESA field sampling and analysis which adequately characterize the presence of harmful chemicals or conditions, if any.

    b. Please discuss whether there will be any risk to construction or plant personnel due to the presence of these chemicals.

38. Please provide an estimate of the amount of asbestos and/or lead, if any, that will disposed of from the demolition of the existing warehouse/maintenance shop located at the project site.

39. a. Please provide staff with a list of state regulating agencies (i.e. Department of Toxic Substances Control) that will be responsible for verifying that the 2.3-acre proposed project site requires no further investigation, that there is no harmful concentrations of any contaminate that will be encountered by workers or the public, and that the site is ready for redevelopment.

    b. Please provide names, offices, telephone numbers and any additional contact information of the responsible/oversight agency.

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 *WATSON COGENERATION STEAM AND ELECTRICITY RELIABILITY PROJECT*

Docket No. 09-AFC-1

PROOF OF SERVICE LIST
(Est. 4/22/09)

APPLICANT

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INTERESTED AGENCIES

California ISO
e-recipient@caiso.com

*indicates change

DECLARATION OF SERVICE

I,Teraja' Golston, declare that on September 1, 2009, I served and filed copies of the attached, CEC Data Requests Set 1 dated August 28, 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/watson].

The documents have 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:

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

x 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. 09-AFC-1
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512
docket@energy.state.ca.us

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

_____
Teraja' Golston

*indicates change