



DOCKET

09-AFC-1

DATE JUL 30 2010

RECD. JUL 30 2010

July 30, 2010

Dockets Unit
California Energy Commission
1516 Ninth Street, MS 4
Sacramento, CA 95814-5512

Re: Watson Cogeneration Steam and Electric Reliability Project
Application for Certification 09-AFC-1

On behalf of Watson Cogeneration Company, the applicant for the above-referenced Watson Cogeneration Steam and Electric Reliability Project, we are pleased to submit the following:

- Response to CEC Data Request #4 Status Report 11.

This document is being submitted to the CEC for docketing.

Sincerely,
URS Corporation

Cindy Kyle-Fischer
Project Manager

Enclosure

cc: Proof of Service List

RESPONSES TO CEC DATA REQUESTS (#1-39) APPLICATION FOR CERTIFICATION (09-AFC-1)

for Watson Cogeneration Steam and Electric Reliability Project

AIR QUALITY RESPONSE #4 STATUS REPORT 11



Submitted to:
California Energy Commission
1516 9th Street , MS 15
Sacramento, CA 95814-5504



Submitted by:
Watson Cogeneration Company
22850 South Wilmington Avenue
Carson, CA 90745



With support from:
URS Corporation
8181 East Tufts Avenue
Denver, CO 80237



August 2010

Response to Data Request Set 1, Data Request 4 (ERC Status Report 11)

Air Quality Data Request 4.....1

List of Acronyms and Abbreviations Used in Responses

AFC	Application for Certification
CEC	California Energy Commission
CEQA	California Environmental Quality Act
ERC	Emission Reduction Credit
lb	pound
NO _x	nitrogen oxides
PM ₁₀	sub 10-micron particulate matter
RECLAIM	Regional Clean Air Incentives Market
RTCs	RECLAIM Trading Credits
SO _x	sulfur oxides
VOC	volatile organic compound

AIR QUALITY DATA REQUEST 4

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. NO_x and SO_x RECLAIM Trading Credits (RTCs) are also proposed from the existing refinery allocation or additional RTCs will be acquired.

DATA REQUEST

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 NO_x, SO_x, 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 lbs/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.*

RESPONSE

Status update for nitrogen oxides (NO_x)

There has been no change in status for NO_x since ERC Status Report 1 of October 2009.

Status update for sulfur oxides (SO_x)

There has been no change in status for SO_x since ERC Status Report 1.

Status update for volatile organic compounds (VOCs)

There has been no change in status for SO_x since ERC Status Report 2 of November 2009.

Status update for sub 10-micron particulate matter (PM₁₀)

The current offset market for PM₁₀ ERCs remains limited.

As discussed in ERC Status Report 1, pricing information has not been provided, as this information is considered to be a “confidential” aspect of any ERC transaction, and has no bearing on any aspect of project review or certification.



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
(Revised 2/8/10)

APPLICANT

Ross Metersky
BP Products North America, Inc.
700 Louisiana Street, 12th Floor
Houston, Texas 77002
ross.metersky@bp.com

APPLICANT'S CONSULTANTS

URS Corporation
Cynthia H. Kyle-Fischer
8181 East Tufts Avenue
Denver, Colorado 80237
cindy_kyle-fischer@urscorp.com

COUNSEL FOR APPLICANT

Chris Ellison
Ellison Schneider and Harris LLP
2600 Capitol Avenue, Suite 400
Sacramento, CA 95816
cte@eslawfirm.com

INTERESTED AGENCIES

California ISO
e-recipient@caiso.com

INTERVENORS

California Unions for Reliable Energy
(CURE)
c/o: Tanya A. Gulesserian
Marc D. Joseph
Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard,
Suite 1000
South San Francisco, CA 94080
tgulesserian@adamsbroadwell.com

ENERGY COMMISSION

ROBERT WEISENMILLER
Commissioner and Presiding
Member
rweisenm@energy.state.ca.us

KAREN DOUGLAS
Chairman and Associate Member
kldougl@energy.state.ca.us

Kourtney Vaccaro
Hearing Officer
kvaccaro@energy.state.ca.us

Alan Solomon
Project Manager
asolomon@energy.state.ca.us

Christine Hammond
Staff Counsel
chammond@energy.state.ca.us

*Jennifer Jennings
Public Adviser's Office
publicadviser@energy.state.ca.us

DECLARATION OF SERVICE

I, Cindy Kyle-Fischer, declare that on July 30, 2010, I served and filed copies of the attached *Response to CEC Data Request #4 Status Report 11*, dated August 2010. 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: [\[www.energy.ca.gov/sitingcases/watson\]](http://www.energy.ca.gov/sitingcases/watson).

The document has 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:

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

by personal delivery or by depositing in the United States mail at Denver, Colorado 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 ___ 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.



Cindy Kyle-Fischer