

CALIFORNIA ENERGY COMMISSION

1516 NINTH STREET
SACRAMENTO, CA 95814-5512



DOCKET
02-AFC-1C

DATE JUL 12 2010

RECD. JUL 12 2010

July 12, 2010

David L. Wiseman
Galati Blek
455 Capitol Mall, Suite 350
Sacramento, CA 95814

**SUBJECT: BLYTHE ENERGY PROJECT, PHASE II (02-AFC-1C)
AMENDMENT NO. 1, DATA REQUESTS #15-20**

Dear Mr. Wiseman:

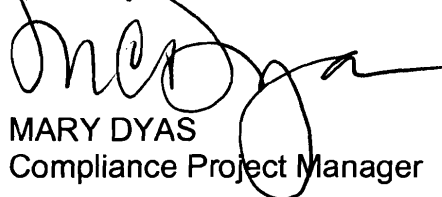
Pursuant to Title 20, California Code of Regulations, section 1769, the California Energy Commission (Energy Commission) staff requests the information specified in the enclosed Data Requests. The information requested is necessary for Energy Commission staff to more fully understand the project and the proposed amendment and to assess whether the project will result in adverse impacts.

This set of Data Requests (#15-20) is being made in the area of air quality. The Data Requests were developed as a result of staff's review of the proposed Blythe Energy Project, Phase II Amendment Petition (Petition) filed with the Energy Commission on October 23, 2009 and the need to include information pertaining to greenhouse gases in their analysis. A modification to the Petition was filed on January 4, 2010 and supplemental information was filed on February 16, 2010. Written responses to the enclosed Data Requests are due to the Energy Commission staff on or before August 12, 2010 or at such later date as may be mutually agreed.

If you are unable to provide the information requested, or object to providing the requested information, please notify me within 14 days of receipt of this request. Any objections to the Data Requests must contain the reasons for not providing the information, and the grounds for any objections (see Title 20, California Code of Regulations, section 1769).

If you have any questions, please call me at (916) 651-8891, or E-mail me at mdyas@energy.state.ca.us.

Sincerely,



MARY DYAS
Compliance Project Manager

cc: Docket Unit

**BLYTHE ENERGY PROJECT, PHASE II, AMENDMENT NO. 1 (02-AFC-1C)
Data Requests**

**Technical Area: AIR QUALITY
Author: Tao Jiang**

Construction Period Greenhouse Gas Emissions

BACKGROUND

Energy Commission staff plans to describe the quantity of greenhouse gas (GHG) emissions during construction of the project based on the construction activity estimates and fuel use projections. These include emissions of carbon dioxide, nitrous oxide, and methane. The GHG emissions estimates should consider activity related to onsite construction, construction of linear facilities, worker travel, and material deliveries using diesel trucks during construction.

DATA REQUEST

15. Please show detailed calculations for total and annual GHG emissions for the construction phase of the proposed project including all activities at the construction site and any construction activities for linear facilities (gas pipeline and transmission lines), worker travel, and truck or rail material deliveries.

Operating Period Federal Short-term NO₂ Standard

BACKGROUND

EPA has established a new, short-term NO₂ standard of 100 ppb based on a 3-year average of the 98th-percentile of the annual daily maximum 1-hour concentration at an air monitoring station. The final rule for the new NAAQS was published in the Federal Register on February 9, 2010, and the standard became effective on April 12, 2010. According to EPA's April 1, 2010 Memorandum titled "Applicability of the Federal Prevention of Significant Deterioration Permit Requirements to New and Revised National Ambient Air Quality Standards," permits issued on or after April 12, 2010 must demonstrate that the source's allowable emissions will not cause or contribute to a violation of the new short-term NO₂ NAAQS. Although this applies to projects subject to a federal Prevention of Significant Deterioration decision after April 12, 2010, Energy Commission staff will include the new standard in its evaluation of Laws, Ordinances, Regulations and Standards (LORS).

DATA REQUEST

16. Please provide revised NO₂ modeling analyses for normal operation to demonstrate the compliance with the new, short-term EPA NO₂ standard, including the 3-year averaging requirement.

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Operating Period Greenhouse Gas Emissions

BACKGROUND

The Energy Commission has established a Precedent Decision in the Energy Commission decision for the Avenal Energy siting case (08-AFC-01), which requires proposed natural gas power plant applicants to demonstrate they would reduce systemwide heat rates.

DATA REQUEST

17. a. Please explain the bases used to derive the capacity and heat rate values in Figure 1-3.
- b. Please justify the values for average site conditions, including temperature and relative humidity.
- c. Please explain results as they compare to identical turbines proposed for El Segundo (heat rate = 7,311 BTU/kWh) and Carlsbad (heat rate = 7,165 BTU/kWh).

BACKGROUND

SB 1368 and regulations adopted by the Energy Commission and the Public Utilities Commission pursuant to the bill, prohibit California utilities from entering into long-term commitments with any facilities intended to be operated as a base load facility if facility emissions would exceed the Greenhouse Gas Emission Performance Standard of 0.500 metric tonnes CO₂ per megawatt-hour (1,100 pounds CO₂/MWh). Specifically, the SB 1368 Emission Performance Standard (EPS) applies to new power plants, new investments in existing power plants, and new or renewed contracts with terms of five years or more, including contracts with power plants located outside of California.

DATA REQUEST

18. Please provide the calculations for expected annual net energy output (in MWh/yr) and annual GHG performance (MTCO₂e/MWh) for typical year operations, including the assumptions and operational scenarios used for the calculations.

Cumulative Air Quality Impacts

BACKGROUND

The AFC Amendment (Section 5.2.5.9 and Appendix 5.2 H) describes a PM_{2.5} cumulative impacts analysis including the existing Blythe I facility, Southern California Gas compressor station and the proposed Blythe II facility. However, staff needs a more complete cumulative impacts analysis that includes all criteria pollutants and all stationary sources that are not included in the background conditions, including all

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reasonably foreseeable projects in the area that may contribute to air quality impacts of the proposed project. A list of reasonably foreseeable projects within six miles of the Blythe II facility has not been provided by the Mojave Desert Air Quality Control District (MDAQCD). For example, staff notices that the Blythe Solar Power Project, which is currently in the CEC licensing process, is also located within 6 miles of the proposed Blythe II facility.

DATA REQUEST

19. Please provide a copy of any MDAQCD correspondence regarding recent and planned sources located within six miles of the Blythe II facility.
20. Please provide the cumulative modeling analysis for operating period impacts, including the Blythe II facility and other identified recent and planned projects within 6 miles of the Blythe II facility.