CALIFORNIA ENERGY COMMISSION
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August 13, 2009

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09-AFC-2
DATE AUG 13 2009
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Mr. Randy Baysinger
Turlock Irrigation District
333 East Canal Drive
Turlock, CA 95381-0949

RE: ALMOND 2 POWER PLANT PROJECT (A2PP) (09-AFC-2)
DATA REQUEST SET 1 (#s 1-84)

Dear Mr. Baysinger:

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 1-84) is being made in the areas of Air Quality (#s 1-15), Cultural Resources (#s 16-24), Hazardous Materials Management (#s 25-29), Public Health (#s 30-33), Soil and Water Resources (#s 34-69), Traffic and Transportation (#s 70-71), Transmission System Engineering (#s 72-74), Waste Management (#s 75-78) and Worker Safety and Fire Protection (#s 79-84). Written responses to the enclosed data requests are due to the Energy Commission staff on or before September 11, 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) 654-4640 or email me at fmiller@energy.state.ca.us.

Sincerely,

Felicia Miller
Project Manager

Enclosure

PROOF OF SERVICE (REVISED 7/28/09) FILED WITH ORIGINAL MAILED FROM SACRAMENTO ON 8/13/09
HA

Technical Area: Air Quality
Author: Tao Jiang and Brewster Birdsall

Air Quality Permit Application
Background

The proposed project will require permits (the Preliminary Determination of Compliance and Final Determination of Compliance) from the San Joaquin Valley Air Pollution Control District (SJVAPCD or "District"). These permits are integrated into the staff analysis. Therefore, staff will need copies of all correspondence between the applicant and the District in a timely manner in order to stay up to date on any permit issues that arise prior to completion of the Preliminary or Final Staff Analysis.

Data Request

1. Please provide copies of all substantive District correspondence regarding the permit application, including e-mails, within one week of submittal or receipt. This request is in effect until the final Commission Decision has been recorded.

Baseline Conditions
Background

The site of the proposed A2PP includes the existing Almond Power Plant (APP) with one General Electric (GE) LM 6000 natural gas-fired, steam-injected, combined-cycle combustion gas turbine and one 240 HP Cummins diesel fire pump engine. The existing potential to emit is shown in the Application for Certification (AFC) Table 5.1-13 and the existing unit and fire pump engine are considered in the May 2009 cumulative impact analysis in AFC Appendix 5.1G, but the existing baseline emissions from the APP have not been identified. Additionally, although the AFC Section 5.1.3.1 and existing permits (in AFC Attachment 5.1A-1) show up to 100 hours per year for fire pump engine maintenance and testing, the California Air Resources Board standards for toxic emissions for new emergency diesel engines allows up to 50 hours per year (Cal. Admin. Code tit. 17, Sec. 93115.6) (Cal. Code of Regs., tit. 17, Sec. 93115.6(3)(a)(c)).

Data Request

2. Please quantify the historical operating hours and actual emissions from the existing APP combustion turbine for at least a two-year period prior to filing the AFC.
3. Please describe whether the existing APP is likely to change its operational patterns as a result of the proposed A2PP.
4. Please discuss whether the existing fire pump engine would be subject to recent requirements that allow up to 50 hours per year for emergency engine maintenance and testing, rather than up to 100 hours/year as noted in the AFC.

Construction-Phase Diesel Particulate Matter Emissions

The AFC for A2PP shows potential impacts at the fence line of greater than 10 in one million cancer cases during construction (AFC Appendix 5.1E, Fig 5.1E-5) due primarily to diesel particulate matter. The emission estimates for diesel particulate matter and other emissions in construction equipment exhaust are based on all construction

equipment engines rated over 100 horsepower being able to meet the Tier 3 California Emission Standards for Off-Road Compression-Ignition Engines. However, this level of control is not identified as a feasible control strategy in the Available Mitigation Measures of AFC Appendix 5.1E. Additionally, there appears to be a typo in Table 5.1E-2, because PM2.5 should not be higher than PM10, which the AFC finds to be 0.4 tons per year for the construction equipment exhaust.

5. Please confirm that it would be feasible to comply with a condition of certification requiring all construction equipment engines rated over 100 horsepower to meet the Tier 3 California Emission Standards for Off-Road Compression-Ignition Engines.

6. Please confirm that there is a typo in the PM2.5 emission rate of Table 5.1E-2, and if so, correct the typo.

Construction-Phase Greenhouse Gas Emissions

BACKGROUND

Energy Commission staff plans to describe the quantity of greenhouse gases (GHG) emissions during construction of the project based on the construction activity estimates and fuel use projections in AFC Appendix 5.1E. These include emissions from 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. The AFC only provides a brief summary of the GHG emissions during the construction in Table 5.1E-5 of Appendix 5.1E, and it does not provide the calculation details for GHG in Attachment 5.1E-1.

DATA REQUEST

7. Please show the 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 trucked material deliveries.

Cumulative Air Quality Impacts

BACKGROUND

The AFC (Section 5.1.8 and Appendix 5.1G) describes a cumulative impacts analysis including only the existing APP along with the proposed A2PP. A complete cumulative impacts analysis should consider all stationary sources that are not included in the background conditions, such as the reasonably foreseeable projects in the area that may contribute to the air quality impacts of the proposed project. A list of reasonably foreseeable projects within six miles of A2PP has not been provided by the SJVAPCD.

DATA REQUEST

8. Please provide a copy of the District’s correspondence regarding recent and planned cumulative sources located within six miles of the A2PP site.

9. Please provide the cumulative modeling analysis, including APP, A2PP, other identified recent and planned projects within 6 miles of the A2PP site as promised in the modeling protocol in AFC Appendix 5.1B.

Commissioning Emission Factors

BACKGROUND

Energy Commission staff expects to see that volatile organic compounds (VOC) emissions during initial facility commissioning and testing would be similar to those of routine operation, because they tend to be a function of fuel use. During routine operation, the applicant proposes an emission factor of 0.0025 lb/MMBtu is proposed, and no explanation is given for the proposal to allow 30 times this level during commissioning (0.0758 lb/MMBtu as in AFC Table 5.1B-7a).

DATA REQUEST

10. Please provide vendor specifications and a description of the basis for the proposed emission factors during commissioning as shown in AFC Table 5.1B-7a.

Cooling System Emission Sources

BACKGROUND

The description of the cooling system indicates evaporative cooling of the inlet air for each combustion turbine (AFC Section 2.1.7). Although relatively small, if evaporative cooling towers would be used for cooling the inlet air, then the source parameters and potential drift emissions from those cooling tower cells should be identified.

DATA REQUEST

11. Please provide complete information describing the potential drift emissions and source parameters (including exhaust velocity and temperature) from any proposed evaporative cooling system for the combustion turbine inlet air.

12. Please analyze and describe the potential air quality impacts due to drift emissions from the proposed evaporative cooling system.

Thermal Efficiency and Greenhouse Gas Emissions

BACKGROUND

Heat rates in the AFC Section 2 are only shown on the basis of the fuel lower heating value (LHV). Energy Commission staff requests that heat input information and thermal efficiency of the proposed power plant be stated in higher heating value (HHV) as well as LHV.

DATA REQUEST

13. Please provide the heat rate information for the proposed combustion turbines (in AFC Project Description, Figure 2.1-3) in terms of higher heating value, to better facilitate comparisons with other power plant data used by staff in determining greenhouse gas impacts.

Meteorological Data

BACKGROUND

The modeling protocol of December 2008 (AFC Appendix 5.1B) and the impact analysis in the AFC rely on four years of meteorological data gathered at Modesto. Each of the four years of data have more than 5 percent of the hours missing, and data from 2001 has nearly 14 percent of the hours missing.[1] While this may be sufficient data for Energy Commission staff to complete our impact assessment, it may not satisfy the federal review process, which normally requires five years of meteorological data for analysis under the Prevention of Significant Deterioration (PSD) program (as in U.S. EPA, New Source Review Workshop Manual, Draft October 1990).

DATA REQUEST

14. Please confirm that the meteorological data used in the impact assessment is likely to satisfy guidance from the U.S. Environmental Protection Agency (US EPA). If not, supply additional data to meet US EPA program requirements.

Greenhouse Gas Emissions

BACKGROUND

Turlock Irrigation District (TID) also operates the Walnut Energy Center and other generating units as part of the transmission control area, which is outside of the jurisdiction of the California Independent System Operator.

DATA REQUEST

15. Please describe whether existing generating units in the TID control area, including the Walnut Energy Center, are likely to change their operational patterns as a result of the proposed A2PP and describe the expected net effects on greenhouse gas emissions from the system.

[1] The modeling output submitted on by TID on the CD with the AFC reports: “Data May Not Be Acceptable for Regulatory Applications. See Section 5.3.2 of Meteorological Monitoring Guidance for Regulatory Modeling Applications" (EPA-454/R-99-005).”

Technical Area: Cultural Resources
Author: Beverly E. Bastian

BACKGROUND

The project description in the AFC states that the proposed A2PP site was previously used as a borrow pit for the construction of the WinCo distribution center to the north, then backfilled with commercial fill (p. 2-1). The paleontology section in the AFC states that the fill on the project site extends to approximately 6.5 feet below the surface across the entire site, and that soils disturbed by agriculture extend to 4 feet below the surface along the project's proposed linear facilities (pp. 5.8-9–5.8-10).

Staff assumes that some of the equipment that would be installed on the plant site would require foundations capable of considerable weight-bearing and that such foundations would have to extend to some depth in the ground. Staff additionally expects that over-excavation of the holes for these foundations and filling with engineered fill could be required to ensure the stability of the foundations. Auxiliary feature construction, such as excavating the retention pond and trenching for pipe installations, are also likely to require excavation to some depth. To assess potential project impacts to possible buried archaeological resources, staff needs information on the greatest depth in excess of 6.5 feet below the present surface to which excavations at the site would extend and the greatest depth in excess of 4.0 feet below the present surface to which excavations along the linear facilities would extend.

DATA REQUESTs

16. Please provide a table listing the features, installations, and foundations for equipment on the proposed plant site for which excavations would exceed 6.5 feet below the present ground surface and indicating the depth that would be reached for each.
17. Please provide a project site plan, by shading or other such convention, showing the locations where excavation would exceed 6.5 feet below the surface.
18. Please provide a table listing the installations along the proposed routes of the linear facilities for which excavations would exceed 4.0 feet and indicating the depth that would be reached for each.

BACKGROUND

According to the AFC's paleontology section, the uppermost 10-20 feet of undisturbed sediments in the proposed project vicinity are Tuolumne River alluvial fan deposits known as the Modesto Formation, dating from 75,000 to 10,000 years before the present. The proposed project's two alternative natural gas pipeline routes, extending south to the floodplain of the San Joaquin River, traverse the same Modesto Formation deposits and cut across the toe of the fan (p. 5.8-5).

As noted in the previous Background, fill on the A2PP project site extends to approximately 6.5 feet below the surface across the entire site, and soils disturbed by agriculture extend to 4.0 feet below the surface along the project's proposed linear facilities (p. 5.8-9). So the proposed project's potential to impact buried archaeological

deposits, which would date no earlier than 14,000 years ago, depends on how much geologic time is represented by the displaced 6.5 feet on the project site and the disturbed 4.0 feet along the linear facility routes.

DATA REQUEST

19. Please have the author of the Paleontological section of the AFC provide an assessment, along with the evidence on which the assessment is based, on whether the sediments below 6.5 feet (from the ground surface) at the project site and below 4.0 feet (from the ground surface) along the linear facility routes and at the end of the natural gas line routes are of a geologic age young enough to contain archaeological deposits.

BACKGROUND

In order to meet Energy Commission Data Adequacy requirements, the applicant sent letters inquiring about known local cultural resources to Stanislaus County, to local historical and archaeological societies, and to representative Native Americans. Staff needs copies of any responses to these letters received since the AFC was submitted.

DATA REQUEST

20. Please provide copies of any letters received from Stanislaus County, or from local historical and archaeological societies, or from contacted Native Americans in response to the applicant's inquiries about local cultural resources.

BACKGROUND

Another Turlock Irrigation District (TID) project, the Hughson-Grayson 115-kV Transmission Line and Substation Project, is under environmental review (State Clearinghouse No. 2009012075). This project includes the Grayson Substation, into which the A2PP will connect, and three transmission lines in the vicinity of the Almond Power Plant. TID stated that the draft Environmental Impact Report (EIR) for this project was expected in July, 2009 (AFC, p. 2-1). In that these project may affect cultural resources in the vicinity of the A2PP, please provide staff with a copy of this report.

DATA REQUEST

21. When it is available, please provide to staff a copy of the draft EIR for the Hughson-Grayson 115-kV Transmission Line and Substation Project.

BACKGROUND

The "Geologic Hazards and Resources" section of the AFC notes that a geotechnical study of the proposed plant site will be prepared at some future time (p. 5.3-1). Staff needs to review this report for evidence of the potential for subsurface archaeological deposits.

DATA REQUEST

22. Please provide a copy of the project's geotechnical study when it is available.

BACKGROUND

The proposed project's natural gas pipeline would cross several TID canals. The Cultural Resources section of the AFC addresses these canals and other TID system features as individual cultural resources, but does not consider the TID system in its entirety as a potential historic district. To ensure that all cultural resources that could be impacted by the proposed project are identified and evaluated for potential California Register of Historical Resources (CRHR) eligibility, staff needs the applicant's consulting architectural historian to address the possibility that the TID irrigation system, as a historic district, could be eligible for the CRHR, making it a historical resource under CEQA.

DATA REQUEST

23. Please have a qualified architectural historian discuss the TID irrigation system as a potential historic district and make a recommendation, with appropriate justification, on its eligibility for the CRHR. Additionally, if the architectural historian recommends that the TID irrigation system is a potentially significant historic district, please have that person recommend which of the canals that could be impacted by the proposed project are contributors to that district.

BACKGROUND

The Cultural Resources Technical Report's (AFC, Vol. 2, App. 5.3-B) References section lists several CHRIS Primary record forms for the Tidewater Southern Railroad and for the canals that are part of the TID irrigation system. Staff needs these forms to make an independent assessment of the potential CRHR eligibility of these resources.

DATA REQUEST

24. Please provide completed copies of the following forms:

    a) Bard and Calvit, Primary Record Form Lateral 5, TID, 2002;

    b) Hatoff, Primary Record Form P-50-000083 (Segment of the Tidewater Southern Railroad), 1995;

    c) JRP, Primary Record Form P-50-000071 (Segment of Lateral No. 2 ½), 1993;

    d) JRP, Primary Record Form P-50-000072 (Segment of Lateral No. 3), 1993;

    e) Napton, Primary Record Form P-39-15 (X-ajo-256h)—Tidewater Southern Railway (between Lathrop Road and Spreckles Road, Manteca, CA), 1994; and

    f) Sharpe, Primary Record Form P-50-000083 (Segment of the Tidewater Southern Railroad), 2003.

Technical Area: Hazardous Materials Management
Author: Dr. Alvin Greenberg

BACKGROUND

The AFC (Section 5.5.4.2.2) states that the existing APP anhydrous ammonia storage tank that will be used for the proposed A2PP. The existing power plant already has a current Risk Management Plan (RMP) and Hazardous Materials Business Plan (HMBP) and staff assumes that the existing RMP also contains a Process Safety Management Plan (PSMP). Staff needs the information contained in these plans in order to conduct its assessment and consider necessary and appropriate Conditions of Certification to protect workers and the off-site public.

DATA REQUESTS

25. Please provide the current RMP (containing the PSMP) addressing the anhydrous ammonia storage tank at the APP site.

26. Please provide the existing Hazardous Materials Business Plan.

27. Please provide a written description and schematic drawing of the proposed connections and piping from the existing anhydrous ammonia storage tank to the proposed A2PP facility. Please be sure to identify all control valves (manual or remote activated) and ammonia sensors located at the tank, loading pad, ammonia skid, and along the piping route from the tank to A2PP.

28. Please identify the person responsible for existing APP and proposed A2PP site security by name and phone number so that staff may call and discuss site security measures.

29. Please provide a narrative description, including references to all training manuals, for any joint exercise the existing APP facility has conducted with responsible agencies (e.g., Ceres Emergency Services - Fire Division, Stanislaus County Environmental Resources Department Hazardous Materials Division, Ceres Police Dertment., Stanislaus County Sherriff's Department, the California Highway Patrol, the Federal Bureau of Investigation, the California Office of Homeland Security) on emergency response procedures for fire, confined space rescue, hazardous materials releases, terrorist attacks, and/or the need for emergency medial services. Also include dates of these joint training exercises and a list of agencies involved.

Technical Area: Public Health
Author: Dr. Alvin Greenberg

BACKGROUND

An applicant's health risk assessment should include emissions of Toxic Air Contaminants (TACs) from all sources. The AFC mentions that process water obtained from the City of Ceres Wastewater Treatment Plant will be used for, among other uses, "evaporative cooling" (section 21.7.2). Since reclaimed water will be used for evaporative cooling, staff needs to know more about the nature of the evaporative cooler and if drift or emissions are possible. Staff notes that emissions from the evaporative cooler were not included in the health risk assessment and thus more information is needed to justify that omission.

DATA REQUESTS

30. Please provide a description of the evaporative cooling system.

31. If airborne emissions from the evaporative cooling system are possible, please provide a revised health risk assessment that includes emissions factors, risk, and hazard from the evaporative cooler.

BACKGROUND

The HARP model is used to assess cancer risk and chronic and acute impacts for this proposed project. Several HARP-generated files have been provided on the "Air Quality and Public Health Modeling Files" CD. However, in order to facilitate evaluation of the modeling effort, the HARP transaction file (.tra) is required.

DATA REQUEST

32. Please provide the HARP transaction file (.tra) which includes the proposed and existing facilities.

BACKGROUND

The AFC (Figure 5.9-4A) shows the locations of sensitive receptors (schools, pre-school/day care centers, houses of worship, parks, nursing homes and hospitals) within a 3-mile radius of the proposed power plant (north half of radius). It shows two pre-schools/day care centers on Crows Landing Road a few blocks south of SR-99. It does not show any schools located on Crows Landing Road. However, Figure 5.9-2C depicts the location of schools within the 3-mile radius and it shows a school on Crows Landing Road about 5 blocks south of SR-99. Since Crows Landing Road is the proposed hazardous materials delivery route for anhydrous ammonia, staff needs to know which map is correct and where all concentrations of sensitive receptors are located.

DATA REQUEST

33. Please provide accurate information regarding the location of all sensitive receptors (schools, pre-school/day care centers, parks, nursing homes, houses of worship and hospitals) located along or within ¼ block of Crows Landing Road.

Technical Area: Soils and Water Resources
Authors: Vince Geronimo, PE and Rachel Cancienne, EIT

PROJECT BACKGROUND

Turlock Irrigation District (TID or Applicant) proposes to construct, own and operate a 174-megawatt (MW) natural gas-fired, simple-cycle peaking power plant on a 4.6 acre parcel adjacent to their existing 48 MW TID Almond Power Plant (APP) located in Ceres, California. Staff did not review design data for the existing facility. The Almond 2 Power Plant (A2PP) Project would consist of three 58 MW General Electric LM6000PG Turbines with a SPRINT (spray intercooling) system, a new 115-kilovolt (kV) switchyard, a new natural gas supply line, two 115-kV transmission line corridors approximately 0.9 and 1.2 mile long, reconductoring of approximately 2.9 miles of an existing 69-kV sub-transmission, and an onsite interconnection to the existing water treatment and discharge systems for the APP. Reclaimed water for these systems is provided by and discharged to the City of Ceres Wastewater Treatment Plant (WWTP). A new retention pond would be constructed that would serve the stormwater management needs of both the A2PP and the existing facility.

WATER SUPPLY AND USE

BACKGROUND

The water to be used for A2PP power plant process water would be supplied to the site through an existing system used for APP. Water for APP is pumped from approximately 35 to 65 feet below ground surface near the City of Ceres WWTP percolation-evaporation (P-E) basins. Water is delivered to the power plant site via a 6-inch diameter pipeline between the APP and the City of Ceres Waste Water Treatment Plant (WWTP). A2PP's average daily water use would be approximately 319 gallons of water per minute (gpm) assuming 60ºF. The annual power plant process water would be about 293 acre-feet per year assuming typical expected operation of 5,000 hours per year (57 percent capacity factor). The case for operating 8,760 hours per year was also evaluated. Total water use for this case would be approximately 514 acre-feet per year (100 percent capacity factor). A Water Balance Diagram was provided in Section 2.1.7 Water Supply and Use. When temperatures increase to 110ºF, the expected water use increases to 349 gpm. Staff needs additional information on the exact location of the well with respect to the Ceres WWTP P-E basins. Staff needs information on any wells within a one-half mile influence of the A2PP supply well.

The Applicant has stated that there is a "high level of reliability of water from the Ceres WWTP" (AFC 5.15.1.4.1) and that no backup water supply is required. Staff spoke with Michael Riddell, City of Ceres WWTP Supervisor to confirm the process water supply budget. The Ceres WWTP has the process capacity for 3.1 million gallons per day (mgd) of wastewater but currently generates roughly 2.0 mgd of primary treated effluent. The WWTP discharges approximately 1.0 mgd into the WWTP P-E basins while the A2PP maximum demand is roughly 0.9 mgd. Another 1.0 mgd is piped to Turlock WWTP, which is about 12 miles away. According to Mr. Riddell, Turlock WWTP has an agreement to receive up to 2.0 mgd from Ceres WWTP. Currently the Turlock WWTP facilities require an upgraded before they will accept the full 2.0 mgd. Staff is concerned that the full utilization of the Ceres-Turlock agreement would significantly reduce effluent

to the Ceres WWTP P-E basins, which A2PP relies on for supply. Staff is concerned that evaporation from the P-E basins further reduces the amount of available reclaimed effluent that would otherwise percolate into the ground and be available to A2PP. Staff is concerned that these reductions may reduce the reliability of reclaimed water identified by the Applicant as their only source of supply water.

Ceres WWTP Water Quality Data (from the existing extraction well) was provided in Table 5.15-4 of the AFC. Assuming that only Ceres WWTP effluent is extracted from the well, this water quality data represents primary treated effluent that has settled-out solids in the P-E basin, percolated into the ground, is filtered through soil, and has not mixed with fresh water supplies. This water quality data could change with the additional demand from A2PP. Staff is concerned that the additional demand and increased pumping could draw from fresh groundwater sources near the well. Staff needs information on the Ceres WWTP groundwater water quality to compare to the data supplied in Table 5.15-4. Staff also requires information on the groundwater table and mounding levels at the location of the extraction well.

DATA REQUESTS

34. Referring to AFC Figure 2.1-5 Water Balance Diagram described in Section 2.1.7 Water Supply and Use, assuming temperatures at 110ºF and 60ºF, please quantify:
    a. the total estimated “Evaporation to Atmosphere” in gpm from each CTG;
    b. the discharge stream, in gpm, from the existing APP plant. Please provide a record of peak discharge flows or an estimate if unknown.

35. Please identify:
    a. the location of the City of Ceres WWTP, APP extraction well, meters (if any), and the alignments of the supply pipeline and discharge pipeline to the APP site on a map;
    b. ownership and/or easements for the existing 6-inch diameter pipeline, well, and pump between APP and the City of Ceres WWTP; and
    c. the entity responsible for maintenance of the supply and discharge pipelines.

36. Please quantify:
    a. the “high level of reliability of water from the Ceres WWTP” (AFC 5.15.1.4.1) in average daily and total annual withdrawal capacity of the Ceres Wastewater Treatment Plant (WWTP) percolation ponds. Include in your discussion periodic fluctuations in water available from the Ceres WWTP correlated to anticipated high water usage needs at the power plant site;
    b. the average volume of effluent water from the Ceres WWTP, in mgd, lost to evaporation; and
    c. the maximum pumping capacity from the extraction well located near the Ceres WWTP percolation-evaporation basins.

37. Please provide a list of wells that could be affected by the project's use of groundwater and subsequent aquifer drawdown.

38. Using a groundwater computer model, please quantify the impact on wells affected by the project and identify all assumptions and data used. The model should be tested using several groundwater level scenarios, variability in the discharge rate for Ceres WWTP effluent, and be able to estimate impacts to fresh groundwater resources.

39. Please provide groundwater quality data, reported from the City of Ceres WWTP for comparison to the data provided in Table 5.15-4.

BACKGROUND

Groundwater wells in the Turlock subbasin vary from 50 to 350 feet below ground surface with average yields of 1,000 to 2,000 gallons per minute (gpm). APP currently draws 16,000 gallons per day (gpd) for sanitary service water to the plant and the proposed A2PP would continue using this source. The City of Ceres also utilizes groundwater as its sole source of drinking water. The proposed use of groundwater near the Ceres WWTP can affect the water levels and storage volumes of a nearby potable groundwater supply. Staff is concerned that project groundwater pumping could result in well interference and impact nearby groundwater users.

The Applicant's response to DA-20 in the Almond 2 Power Plant's Supplement A – Data Adequacy stated the A2PP project will not pump groundwater. A copy of the well development pump test for APP was provided (Attachment DA5.15-2). The pump test included a 10/03/00 letter from JL Analytical Services, Inc. describing that the water sample taken "Does Not Meet standards of California and US Public Health Service (standards)"

DATA REQUESTS

40. The Applicant's AFC Supplement A states no ground water would be pumped. In fact, groundwater will be pumped from an existing well near the Ceres WWTP to provide service water for A2PP.
    a. Please explain the Supplement A statement.
    b. Please provide evidence that the groundwater supply will meet title 22 requirements for the proposed industrial use.

41. Please demonstrate that during the maximum water use scenario the drawdown would not result in fresh groundwater use and impact adjacent users.

42. Fire water for A2PP will come from the APP site well. This well has been tested and does not meet CDPH standards. Please explain the treatment methods used for A2PP's fire water supply.

43. Please discuss the existing groundwater table variability at the existing supply pump to include contributing factors (Ceres WWTP P-E Basin infiltration, rainfall

infiltration, etc) affect the groundwater levels. Please demonstrate that the groundwater pumping near the Ceres WWTP will solely be from the wastewater zone of mounding.

BACKGROUND

The Applicant estimates construction water use of 161.3 acre feet during the 12 month construction period. Construction water supply would come from the onsite fire system at the APP or the TID irrigation canal to the south (AFC, 5.15.1.4.3 and 5.15.2.1.3). The AFC did not provide information on the volume and source of water needed for pipeline/tank hydrostatic testing.

DATA REQUESTS

44. Please discuss whether any agreements are needed for access to or delivery from the TID irrigation canal and if those agreements have been executed or are in negotiation.

45. Please provide information on the volume and source of water needed for pipeline/tank hydrostatic testing.

46. Please provide information describing the potential impacts of freshwater use for construction.

WATER ALTERNATIVES

BACKGROUND

AFC Section 6.0 Alternatives, discussed alternative sites and the water supply alternatives for each site. Staff requires more thorough discussion of than provided in Section 6.0 regarding potential water supply options or alternative cooling technologies at the (preferred) A2PP site. To be consistent with state water policy found in State Water Resources Control Board (SWRCB) Resolution 75-58, and the Energy Commission's 2003 Integrated Energy Policy Report (IEPR) water policy, Staff is requesting additional information on potential alternatives to wet cooling technologies and local water source alternatives. Staff is interested in understanding why these available alternatives, which would reduce the plant's water demand and protect water resources from power plant wastewater discharges, were not considered.

Staff requires additional information on back-up water supply and water supply alternatives for A2PP. Staff has identified a potential supply of tertiary-treated, Title 22-quality recycled water. Turlock WWTP, the same plant that receives primary effluent from Ceres WWTP, produces 13.1 mgd of tertiary treated wastewater that meets Title 22 recycled water quality requirements.

DATA REQUESTS

47. Please identify potential alternative cooling technologies (e.g. air-cooling, air-cooling in combination with a mechanical air-chiller) and alternative water supply options (e.g. Title 22 recycled water from Turlock WWTP) for A2PP and

demonstrate that these alternatives are not economically feasible or environmentally desirable.

48. Please provide an economic and environmental analysis of the feasibility of obtaining tertiary-treated recycled water from Turlock WWTP for process water at A2PP. Please identify the volume of recycled water from Turlock WWTP currently committed to other uses.

49. Please describe the power plant operations if the existing pump or service pipeline had an interruption in service due to pump failure, maintenance, etc. If a back-up system of water delivery or other means of supply is planned, please provide a detailed description of that service alternative.

WASTEWATER

BACKGROUND

A2PP general plant wastewater from containment area washdown, sample drains, and facility equipment drains, as well as non-reclaimable process wastewater, would be discharged via the existing 6-inch diameter pipeline between the APP and the City of Ceres WWTP. The wastewater would not be treated by the WWTP prior to discharge to the P-E basins. This discharge of wastewater to surface or groundwater would be permitted under the existing City of Ceres Waste Discharge Requirements (WDRs) set by the Central Valley Regional Water Quality Control Board (RWQCB). These WDRs are roughly 15 years old and expected to be updated or renewed with new prescribed requirements for effluent in the next 12 to 24 months. This WDR change could have a significant impact on the A2PP plan to discharge untreated effluent, high in TDS, salinity, nitrates, and other constituents, to the Ceres WWTP P-E basins.

Drains that could potentially contain oil or grease would first be routed through an oil-water separator and hazardous wastewater would be hauled offsite for appropriate disposal. A2PP would utilize the existing onsite septic tank and leach field at APP to discharge sanitary wastewater. All wastewater-routing and disposal would comply with the Porter-Cologne Water Quality Control Act. This Act controls discharge of wastewater to surface or groundwater in California and is administered by the Central Valley RWQCB.

DATA REQUESTS

50. Please provide a copy of the Ceres WWTP Waste Discharge Requirements (WDR).

51. Please provide copies of all correspondence between TID and the Central Valley RWQCB regarding increased discharge of plant process wastewater to the Ceres WWTP P-E Basins.

52. Please describe the hydraulics of the 6-inch wastewater pipeline (gravity or pressure flow) and confirm that the pipeline has the capacity to convey the expected maximum daily discharge of 174,240 gpd.

53. Referring to Table 5.15-6 in AFC Section 5.15.1.5 Wastewater Collection, Treatment, Discharge, and Disposal; many of the constituent levels described in the expected wastewater are high relative to the (expected) prescribed requirements of the Central Valley RWQCB. Please describe what treatment processes are being examined by TID to ensure that the APP and A2PP facilities would comply with the future, likely more stringent Central Valley RWQCB WDR requirements.

54. Please discuss the feasibility of using a zero liquid (wastewater) discharge system at A2PP or operating the plant so that reuse of wastewater discharge is maximized.

55. Please show the current (approximate) location of the existing septic tank and leach field on a site map.

56. Please provide the capacity of the existing septic tank and leach field.

BACKGROUND

AFC Sections 5.15.1.5 and 5.14.1.2.2 describe the collection of A2PP contact water through the use of floor drains, hub drains, sumps, and the oil-water separator (OWS) during general facility drainage. Section 5.14.1.2.2 says that "if needed, water from this sump will be sampled and analyzed at an approved lab. If contamination is present, the water will be trucked off site for disposal at an approved wastewater disposal facility" rather than discharged to the Ceres WWTP.

DATA REQUESTS

57. Based on the Grading and Drainage Plan map provided in AFC Supplement A, it appears the APP stormwater collection system is conveyed to the OWS. Please confirm that all stormwater from A2PP "contact areas" will be collected and conveyed toward the existing OWS located on the APP site. From the map provided it appears that A2PP stormwater will drain directly to the proposed retention storage pond.

58. Please describe what "if needed" means as it is used in AFC Section 5.14.1.2.2.

59. Please describe the method of analysis and detection limits to be used for sump samples.

WILL SERVE LETTER

BACKGROUND

In the AFC, under a subsection of Section 5.15.1.4 Water Supply, the Applicant stated that a will serve letter from the City of Ceres was included in Appendix 2A of the submittal. This will serve letter did not discuss "water supply."

The City's Will Serve Letter for Almond Power Generation Facility Process Wastewater (AFC, Appendix 2A) dated April 7, 2009 includes the following text:

> The City of Ceres is willing to provide service to the Turlock Irrigation District Almond Power Generation Facility in the form of receiving process wastewater and disposing of it in the Treatment Plant evaporation ponds. However, this service will be contingent upon the City and TID agreeing on mutually beneficial terms in the form of a Second Amendment to the Water Services Agreement dated September 14, 1992.
>
> The amendment must include provisions defining maximum gallons per day and per annum wastewater flows and an "Out" clause should the Regional Board impose new restrictions to treatment or receipt of wastewater flows that would prevent the City from accepting the process wastewater. In such an event TID must be prepared to follow an alternate course of action for disposal of the Power Generation Facility process wastewater.

This letter primarily addresses acceptance of the APP and A2PP process wastewater and does not describe the City's willingness to provide wastewater to the WWTP. The City's WWTP will benefit from groundwater withdrawals near the P-E basins because the drawdown from pumping will increase percolation and improve storage capacity in the P-E basins. Staff is concerned that there is no agreement in place to ensure an adequate water supply is available to meet the needs of the APP and A2PP. Staff is also concerned that the pump near the Ceres WWTP may extract high quality groundwater in the vicinity of the WWTP P-E basins.

DATA REQUESTS

60. Please provide written notification in the form of a letter of intent or Will Serve Letter from the City of Ceres describing their commitment to provide reclaimed WWTP water for use at A2PP, or describe why A2PP would not require a Will Serve Letter.

61. Please provide:
    a. A copy of the September 14, 1992 Water Services Agreement and all subsequent amendments.
    b. If the second amendment has not been settled, provide staff with a status update on when approval of an amendment would be expected.
    c. Describe what is meant by "mutually beneficial terms" of the City of Ceres Will-Serve Letter, Second Amendment.

62. Please describe any potential alternative methods for disposing the plant process wastewater currently being evaluated by TID in the event the wastewater would no longer meet the requirements for discharge to the Ceres WWTP.

SHARED EXISTING FACILITIES

BACKGROUND

A2PP would use and/or share existing elements of the APP's infrastructure. The following shared elements are related to the expanded plant's water use and would not be modified as part of the A2PP Project:

- the fire protection system, including the fire water storage tank and diesel-fired emergency fire pump;
- the well water for service water and emergency shower / eyewash stations;
- the water treatment system;
- the process water supply and wastewater discharge system;
- the oil/water separator; and
- the demineralized and reverse osmosis water storage tanks.

In the A2PP AFC Supplement A – Data Adequacy response to DA-20, the Applicant stated, "Service water and fire water will be provided by an existing well at the Almond Power Plant, and is not part of the A2PP project."

DATA REQUESTS

63. Please verify:
    a. The existing fire protection system, including the fire water storage tank and diesel-fired emergency fire pump are adequate for the plant expansion;
    b. the capacity of the existing water treatment system to process the additional supply needed for A2PP's peak daily demand; and
    c. the existing wastewater discharge system has the capacity for the additional peak daily discharge from A2PP.

64. Please identify the storage capacity (volume) of the demineralized and reverse osmosis water storage tanks and verify this volume would continue to provide the necessary storage for project needs.

STORMWATER MANAGEMENT

BACKGROUND

The proposed A2PP facility will mitigate storm runoff with a series of inlets and storm drain pipes which will convey the runoff to a new onsite retention pond located on the north end of the site. Per the AFC, the new basin would be sized at 2.41 acre-feet (AF) capacity. The stormwater retention basin is sized to capture and detain the runoff resulting from a 100-year 24-hour rainfall event. All runoff would be either infiltrated to the subsurface or evaporated; hence, no stormwater discharges would be released to surface waters or to the surrounding ground surface.

DATA REQUESTS

65. While the AFC states the size of the stormwater retention basin as 2.41 AF with 2.65 feet of freeboard, the Preliminary Drainage Calculations (Applicant Supplement A - Data Adequacy Responses) suggest two alternative basin volumes: 2.83 AF with 2.74 feet of freeboard (Calculation Summary Sheet) and 2.38 AF (Grading and Drainage Plan Figure). Please confirm the capacity of the onsite stormwater retention basin.

BACKGROUND

During construction, approximately 6.45 acres of land associated with the A2PP project would be disturbed for proposed project laydown, temporary parking, and the proposed A2PP site. The General Permit for Stormwater Discharges associated with Construction Activity, administered by the SWRCB, requires a Stormwater Pollution Prevention Plan (SWPPP) be prepared for the construction site. The SWPPP would include best management practices (BMPs) for erosion and sediment control. The SWPPP would be prepared prior to construction of the A2PP project. The draft Construction SWPPP was not provided with the AFC.

To mitigate potential impacts to water and soil resources from the construction of the A2PP project, the Energy Commission requires preparation and implementation of a Drainage Erosion and Sediment Control Plan (DESCP). The DESCP would be updated and revised as the project moves through the design process. The DESCP is a complement to the Construction SWPPP. The DESCP submitted prior to site mobilization must be designed and sealed by a professional engineer/erosion control specialist.

DATA REQUESTS

66. Please provide a draft 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. The DESCP should contain:

    A. **Vicinity Map** – map(s) at a minimum scale 1"=100' 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** – descriptions of all areas subject to soil disturbance for the CGS (project site, laydown area, all linear facilities, landscaping areas, and any other project elements) delineated to show 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 location of all nearby watercourses including swales, storm drains, and drainage ditches. Indicate the proximity of

those features to the CGS construction, laydown, and landscape areas and all transmission and pipeline construction corridors;

D. **Drainage Map** – topographic site map(s) at a minimum scale 1”=100’ showing all existing, interim and proposed drainage systems and drainage area boundaries,, spot elevations where relatively flat conditions exist, and spot elevations and contours, extended off-site for a minimum distance of 100 feet in flat terrain;

E. **Drainage of Project Site Narrative** –a narrative of the drainage measures to be taken to protect the site and downstream facilities, including summary pages from the hydraulic analysis prepared by a professional engineer/erosion control specialist, watershed size(s) in acres used in the calculation of drainage measures, and hydraulic analysis used to support the selection of BMPs and structural controls to divert off-site and onsite drainage around or through the CGS construction and laydown areas;

F. **Clearing and Grading Plans** –a delineation of all areas to be cleared of vegetation and areas to be preserved, including elevations, slopes, locations, and extent of all proposed grading as shown by contours, cross sections or other means locations of any disposal areas, fills, or other special features,. Illustrations of existing and proposed topography that link proposed contours with existing topography;

G. **Clearing and Grading Narrative** –a table with the quantities of material excavated or filled for the site and all project elements of the CGS 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** –locations on the topographic site map(s) 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), including BMP measures designed to prevent wind and water erosion;

I. **Best management practices narrative** –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, for all project elements (site, pipelines, etc.) related to excavations and construction, final grading/stabilization, and post-construction, separate BMP implementation schedules for each project element for each phase of construction, the maintenance schedule including post-construction maintenance of structural control BMPs or a statement provided when such information will be available, and provisions for wet-season work.

67. 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.

68. Please provide a draft construction SWPPP.

SOIL RESOURCES

BACKGROUND

It is believed that the majority of the soil in the A2PP project site has been disturbed and the soil characteristics are likely to be different than those described in the soil survey. The AFC states that a geotechnical evaluation has recently been performed to "ensure that the non-native fill soils are suitable for supporting the A2PP, and is to be provided to the California Energy Commission when available."

DATA REQUESTS

69. Please provide staff with a status update for the Geotechnical Report.

Technical Area: Traffic and Transportation
Author: Marie McLean

BACKGROUND

The AFC does not include information about school bus routes and, if necessary, mitigation to ensure that construction worker traffic, or truck traffic would not interfere with school bus service or compromise the safety of the bus or school children.

DATA REQUEST

70. a. Please provide information about school bus service on roads also used by A2PP construction traffic, including bus routes, times of service, and stops.

    b. If school bus routes will coincide with construction travel routes, please discuss mitigation for potential traffic safety impacts.

BACKGROUND

In the AFC (Section 5.12.2.7, Rail Traffic), the Union Pacific Rail Road tracks are identified as being located east of the project site and not providing passenger service. Staff needs this information for a complete analysis of potential impacts on the local/regional transportation network.

DATA REQUEST

71. Please provide the following information concerning the rail road tracks:

    a. The purpose of the tracks.

    b. The potential for the rail line to be used for delivery of heavy equipment to the site.

Technical Area: Transmission System Engineering
Authors: Laiping Ng

BACKGROUND

The California Environmental Quality Act (CEQA) requires the identification and description of the "Direct and indirect significant effects of the project on the environment." Consideration of the AFC requires discussion of the energy resource impacts which may result from the construction or operation of the power plant. For the identification of impacts on the transmission system resources and the indirect or downstream transmission impacts, staff relies on the System Impact and Facilities Studies to insure the interconnecting grid meets reliability standards. The studies analyze the effect of the proposed project on the ability of the transmission network to meet reliability standards. When the studies determine the project will cause a violation of reliability standards, the potential mitigation or upgrades required to bring the system into compliance are identified. The mitigation measures often include the construction of downstream transmission facilities. CEQA requires the analysis of any downstream facilities for potential indirect impacts of the proposed project. Without a complete System Impact Study or Facility Study, staff is not able to fulfill the CEQA requirement to identify the indirect effects of the proposed project.

DATA REQUEST

72. Please provide the final System Impact Study. The Study should analyze the system impacts with and without the project during peak and off-peak system conditions, and demonstrate conformance or non-conformance with the utility reliability and planning criteria with the following provisions:

    a. Identify major assumptions in the base cases including imports to the system, major generation and load changes in the system and queue generation.

    b. Analyze the system for N-0, important N-1 and critical N-2 contingency conditions and provide a list of criteria violations in a table showing the loadings before and after adding the new generation.

    c. Analyze short circuit duties.

    d. Analyze system for Transient Stability and Post-transient voltage conditions under critical N-1 and N-2 contingencies, and provide related plots, switching data and a list for voltage violations in the studies.

    e. Provide a list of contingencies evaluated for each study.

    f. List mitigation measures considered and those selected for all criteria violations.

    g. Provide electronic copies of *.sav and *.drw PSLF files.

    h. Provide power flow diagrams (**MW, % loading & P. U. voltage**) for base cases with and without the project. Power flow diagrams must also be provided for all N-0, N-1 and N-2 studies where overloads or voltage violations appear. Provide the pre and post project diagrams only for an elements largest overload.

73. Provide the existing TID internal generation capacity during peak and off-peak conditions without the proposed A2PP.

74. Provide the existing maximum TID loads during peak and off-peak conditions.

Technical Area: Waste Management
Author: Ellen 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

75. Please identify whether the City of Ceres or Stanislaus County operates a Construction and Demolition Waste Diversion Program, and cite the jurisdiction to which the A2PP Project would be accountable.

76. Please describe how project operations will meet each of the requirements of the program cited in the previous data request.

BACKGROUND

The A2PP applicant is proposing a 9.1 or 11.1-mile natural gas pipeline that has not been evaluated in an ASTM Standard E1527-05 Standard Practice for Environmental Site Assessments (Phase I ESA) or equivalent.

Review of information in the AFC suggests the natural gas pipeline alignment transverses property where there may be current and past agricultural activity. Sites where there is or has been agricultural activity may have concentrations of pesticides in soil that can be harmful to construction personnel and the public when disturbed by project construction.

For any site in California proposed for the construction of a power plant including linear facilities, 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 A2PP natural gas pipeline alignment has not been evaluated in accordance with the regulations cited above. In order to satisfy this requirement and exercise due diligence to ensure there are no contaminants that would pose a health and safety risk, the applicant should conduct a Phase I ESA for the natural gas pipeline.

DATA REQUEST

77. Please provide a Phase I ESA or equivalent for the proposed9.1 or 11.1-mile natural gas pipeline.

78. a. Please identify the type of crops grown over as long a period as records indicate.

    b. Please list the historical use and identity of pesticides (including organic and inorganic pesticides, and herbicides), and a statement of the likelihood of finding levels of pesticides along the pipeline route that might present a risk to pipeline workers and/or the public.

79. 76. Please provide results of screening and analysis for pesticides or any contaminants of concern that are identified in the Phase I ESA for the gas pipeline alignment.

Technical Area: Worker Safety & Fire Protection
Author: Dr. Alvin Greenberg

BACKGROUND

The AFC (Section 2.1.11) states that the A2PP will share the firewater storage tank, fire-loop system and fire pumps with the existing APP and that the system would be sized to provide two hours of fire protection according to National Fire Protection Agency guidelines. The AFC also states that the existing fire pump will maintain pressure in the fire loop system, but no details are provided that describe whether the existing water fire control system is adequate to provide water for both power plants at the same time. Also, information is needed about the safety showers and eye washes.

Section 2.1 of the AFC describes the primary access point to the project site would be from Crows Landing Road off Highway 99. A secondary access point for emergency response is not identified. All power plants certified by the Energy Commission are required to have two access points to the project site.

Staff needs to know this information in order to properly asses the on-site fire suppression systems and emergency response access and consider necessary and appropriate Conditions of Certification to protect workers, critical energy infrastructure, and the off-site public.

DATA REQUESTS

80. Please provide specific information on:
    a. The amount of stored water dedicated for fire protection and;
    b. The types of pumps (electric or diesel) that maintain pressure in the fire loop system.
81. Please provide the details and identity of the proposed fixed firefighting equipment that will be on-site during the construction phase.
82. Please provide a technical evaluation that ensures that the entire fire water storage system, water flows, and emergency pumps can provide the needed flow, pressure, and duration of flow (minimum of 2 hours) for both the APP and A2PP at the same time should a concurrent fire at both power plants require fire-fighting water.
83. Please describe the gates and locations of the primary and secondary access points to the power plant and mechanism by which emergency responders will be able to enter at either location should power plant personnel not be available.
84. Please provide additional information on whether the safety showers and eyewashes will be self-contained units or use potable water. In either case, please provide the flow rate and if self-contained, the available flow-time.

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 TID ALMOND 2 *POWER PLANT PROJECT*

Docket No. 09-AFC-2

PROOF OF SERVICE
(Revised 7/28/09)

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DECLARATION OF SERVICE

I, Hilarie Anderson, declare that on August 13, 2009, I served and filed copies of the attached, Data Request Set 1 (# 1-84) dated August 13, 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: **[http://www.energy.ca.gov/sitingcases/almond/index.html].**

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, CA 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:

__x__ 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-2
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.

Original Signature in Dockets
Hilarie Anderson