

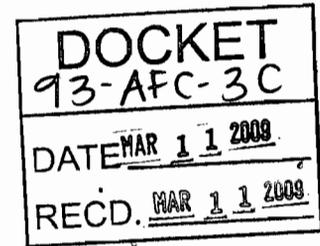
CALIFORNIA ENERGY COMMISSION

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



March 11, 2009

Stu Husband
Sacramento Municipal Utility District
6201 S Street, Mail Stop: B355
Sacramento CA 95817-1899



Dear Mr. Husband:

**DATA REQUESTS 1 to 5 FOR THE SPA CAMPBELL COGENEARTION PROJECT
(93-AFC-3C) AMENDMENT 2009-1**

California Energy Commission staff is asking for the information specified in the enclosed set of data requests. The information requested is necessary to: 1) more fully understand the proposed modifications, 2) assess whether the facility will be constructed and operated in compliance with applicable regulations, 3) assess whether the proposed modifications 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 is being made in the technical area of air quality. Written responses to the enclosed data requests are due to the Energy Commission staff on or before April 13, 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 notify me within 20 days of receipt of this notice.

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

Sincerely,

A handwritten signature in black ink, appearing to read "MDyas", written over a horizontal line.

Mary Dyas
Compliance Project Manager
California Energy Commission
1516 Ninth Street, MS-2000
Sacramento, California 95814

Enclosure

**SACRAMENTO POWER AUTHORITY CAMPBELL COGENERATION (93-AFC-3C)
AMENDMENT 1 DATA REQUESTS**

Technical Area: Air Quality
Author: Keith Golden

BACKGROUND

This amendment request is for the replacement of an older operating system with a new one. There is a brief description that a commissioning period is necessary to tune various systems for the Combustion Turbine Generator (CTG). There appears to be no "hard" limit proposed as to the duration in hours of this commissioning period other than a proposed condition that allow the project to operate without SCR control for up to 100 hours. Staff needs additional information as the extent of this commissioning period, and the particular phases of this commissioning period to warrant such a request. Staff believes that since the Sacramento Power Authority (SPA) is requesting to perform such tests in May that the engineering firms responsible for this commissioning have formulated a written protocol/procedure for this commissioning.

DATA REQUEST

1. Please provide:
 - a. a specific breakdown of the various commissioning activities,
 - b. a description of each commissioning activity,
 - c. the anticipated duration (in minutes and/or hours) of each commissioning activity.
2. Please provide NOx and CO emissions estimates for each commissioning activity identified in the data request above.
3. Please provide emissions data, graphical data or other turbine vendor supplied information that substantiates the requested NOx emissions of 360 lbs/hr and the CO emissions of 500 lbs/hr.

BACKGROUND

There are suggested proposed conditions that use terms such as "the owner/operator shall minimize emissions the maximum extent possible," or "at the earliest feasible opportunity.....minimize emissions". However well intended this kind of wording is, it is virtually unenforceable. Staff is uncertain how an inspector would know that the operator has made efforts to "minimize emissions to the maximum extent feasible at the earliest feasible opportunity." Monitoring the emissions during this commissioning period will not give an indication that emissions were minimized, it will just record what the emissions were. The applicant should provide a detailed commissioning plan for

**SACRAMENTO POWER AUTHORITY CAMPBELL COGENERATION (93-AFC-3C)
AMENDMENT 1 DATA REQUESTS**

review by the CEC and the Sacramento Metropolitan Air Quality Management District prior to commissioning which would provide to the inspector a “roadmap” as to the various activities, enabling a judgment call as whether emissions are being “minimized.” Based on SPA’s responses to the above data requests, permit conditions could be formulated that would limit the duration of magnitude of emissions in a more enforceable way during commissioning.

One of the suggested conditions is as follows:

“The total number of firing hours of the CTG/DB without abatement of nitrogen oxide emissions by the SCR system shall not exceed 100 hours during the commissioning period. Such operation of the CTG/DB shall be limited to discrete commissioning activities that can only be properly executed without the SCR system fully operational. “ There is no discussion in the text of the amendment as to why the SCR must be out of service during this commissioning period, let alone a justification of up 100 hours without the SCR in operation. Staff needs further information about the rationale behind this proposed condition.

DATA REQUEST

4. Please explain why up to 100 hours of operation without the SCR is being requested.
5. Please provide the necessary documentation from the turbine manufacturer (Siemens) or other engineering contractors that justifies the necessity of not operating the SCR system during this “commissioning” period.