

STATE OF CALIFORNIA

CALIFORNIA ENERGY RESOURCES AND DEVELOPMENT COMMISSION

In the matter of:)
Pittsburg District)
Energy Facility)
Application for)
Certification)

Docket No. 98-AFC-1

DOCKET
98-AFC-1
DATE MAR 25 1999
RECD. MAR 25 1999

10607

PREHEARING CONFERENCE STATEMENT
OF CALPINE CORPORATION AND BECHTEL ENTERPRISES, INC.

March 25, 1999

Jeff Harris
Ellison & Schneider
2015 H Street
Sacramento, CA 95814
(916) 447-2166 (Phone)
(916) 447-3512 (Fax)

Attorneys for Calpine/Bechtel

On February 26, 1999, the California Energy Commission issued a Notice of Prehearing Conference for the Pittsburg District Energy Facility. Pursuant to that notice, the Calpine Corporation and Bechtel Enterprises, Inc. ("Calpine/Bechtel") hereby file this Prehearing Conference Statement. Calpine/Bechtel, the applicants for the Delta Energy Center (98-AFC-3), were granted Intervenor status in the Pittsburg District Energy Facility proceeding by Committee order dated September 24, 1998.

INTRODUCTION

The Calpine/Bechtel Delta Energy Center ("DEC") is located approximately 2 miles west of the Pittsburg District Energy Facility ("PDEF"). Given the close proximity of the two projects, there are several similarities between them and numerous common interests. For example, both projects will interconnect at PG&E's Pittsburg Substation; both projects are located within the Bay Area Air Quality Management District ("BAAQMD"); both projects will use reclaimed water from the Delta Diablo Sanitation District; both projects are located within the City of Pittsburg; and the wastewater discharge of both projects will be commingled in the Delta Diablo Sanitation District outfall. In addition, the California Energy Commission staff will be analyzing both projects in the staffs' assessment of cumulative impacts in both the PDEF and the DEC proceedings.

Calpine/Bechtel believe that there are three issue areas that are not yet ready for hearing since the California Energy Commission staff has not yet completed its analysis. In addition, there is one issue area which may require adjudication. These issue areas are discussed in greater detail below.

DISCUSSION

TOPIC AREAS COMPLETE AND READY TO PROCEED

With the exception of the issue areas discussed below under "Topic Areas Not Complete and Ready to Proceed," from Calpine/Bechtel's standpoint, the remaining issue areas in the Staff Assessment are complete and ready to proceed to evidentiary hearings.

TOPIC AREAS NOT COMPLETE AND NOT READY TO PROCEED

There are three areas where the staff has not yet completed its analysis. Accordingly, Calpine/Bechtel does not believe the issue areas are ready to proceed to evidentiary hearings. These issue areas are discussed below.

A. AIR QUALITY

The California Energy Commission staff has not yet completed their air quality analysis for the PDEF facility. Specifically, the cumulative impact analysis has not been completed and was therefore not included in the Staff Assessment. The CEC staff in its Staff Assessment states "this analysis will be complete in time to include it in the supplementary testimony on April 12, 1999." (Staff Assessment, p. 36.) The "Notice of Prehearing Conference and Second Revised Scheduling Order" (the "Revised Scheduling Order") in this proceeding requires all parties to provide written testimony on April 12. Although the Revised Scheduling Order does provide for rebuttal testimony to be filed one week later on April 19, 1999, Calpine/Bechtel will be precluded from conducting its own detailed analysis and filing testimony on this issue, if it deems necessary.

In addition, the CEC Staff Assessment only includes three Conditions of Certification which pertain only to fugitive dust control. There are many other conditions which have yet to be included. Without all of the conditions included in the Staff Assessment, it is impossible for Calpine/Bechtel to conduct its own analysis of the project and determine if there are any aspects of the staff's air quality assessment which are objectionable.

B. WATER RESOURCES

The California Energy Commission staff has not yet finished their analysis regarding water resources. Specifically, the cumulative impact analysis has not been completed. The Staff Assessment states:

The effects of the proposed project in conjunction with the proposed Delta Energy Center on water quality in New York Slough cannot be determined at this point in time. Although the proposed PDEF will discharge wastewater to the wastewater treatment plant, there is a potential for cumulative impacts to water quality. (Staff Assessment, p. 347.)

It is anticipated that the staff will complete its cumulative analysis sometime in April. The Revised Scheduling Order in this proceeding requires all parties to provide written testimony on April 12. Although the Revised Scheduling Order does provide for rebuttal testimony to be filed one week later on April 19, 1999, Calpine/Bethel will be precluded from conducting its own detailed analysis and filing testimony on this issue, if it deems necessary.

C. TRANSMISSION SYSTEM ENGINEERING

The Staff Assessment states that the California Energy Commission will "rely on the Cal-ISO's determination to make its finding related to conformity with applicable reliability standards, the need for additional transmission facilities, and environmental review of the whole of the project." (Staff Assessment, p. 415.) However, the Staff Assessment also states, "The Cal-ISO will not receive the results from PDEF's Detailed Facilities Study being performed by PG&E until approximately May 1999. As a result, their findings are not available to incorporate into this FSA. The Cal-ISO will provide testimony for the Energy Commission's hearings." (Staff Assessment, p. 415.)

The two quoted statements above are incongruent. The California Energy Commission staff will rely on the Cal-ISO's analysis of PDEF's Detailed Facility Study, yet the study will not be completed until after the evidentiary hearings have concluded. The Cal-ISO is also expected to provide testimony at the evidentiary hearings. However, the witness will be testifying on a document he/she has not reviewed, or even seen.

The California Energy Commission staff, through Condition of Certification TSE-1, is simply requiring that PDEF provide the California Energy Commission with a Detailed Facilities Study and execute an Interconnection Agreement for the interconnection with PG&E. PDEF is also required to coordinate with the Cal-ISO in this effort. It is difficult to understand how the Cal-ISO will be able to make the findings on which the California Energy Commission will rely when, according to the Revised Scheduling Order, much of the Cal-ISO's analysis of the PDEF will occur after the evidentiary hearings are complete.

In addition, since the Detailed Facilities Study will not be released prior to the Evidentiary Hearings, Calpine/Bechtel are unable to determine what areas, if any, it finds objectionable. The study may have a significant potential to impact the DEC project, yet Calpine/Bechtel will be unable to provide testimony on this issue or participate in hearings, since it will not have any information on which to testify.

In light of the foregoing, Calpine/Bechtel respectfully request that the Committee clarify how it intends to coordinate the review of the CEC staff and the Cal-ISO staff in a manner that allows for meaningful review and comment by the public and intervenors in this proceeding within the time frames set forth in the Revised Scheduling Order. Accordingly, Calpine/Bechtel reserves the right to identify further issues of concern upon the upon receipt and review of new and additional information to be submitted by the CEC staff, the Cal-ISO staff, and others as it becomes available during the course of this proceeding.

MATTERS IN DISPUTE REQUIRING ADJUDICATION

Based upon the Staff Assessment, Calpine/Bechtel anticipates adjudication in the area of land use. The nature of the dispute regarding this issue area is discussed below.

A. LAND USE

The Staff Assessment includes a discussion on potential cumulative impacts of both the PDEF and DEC projects regarding the use of the Eighth Street corridor for undergrounding the electric transmission lines. The Staff Assessment states:

Essentially the current easement allows room for only one transmission facility. More than likely this would be PDEF's transmission line since their Application for Certification was filed with the Energy Commission 6 months earlier than the DEC's. To accommodate the second transmission line, permission would need to be granted from the City of Pittsburg for encroachment into the 8th Street right-of-way. Staff is uncertain at this time how Pittsburg will handle this situation if both power plants are granted a license from the Energy Commission. (Staff Assessment, pp. 142 and 143.)

DEC believes that a recounting of the chronology for the development of the proposed transmission routes for both the PDEF and the DEC is instructive. The Application for Certification filed by PDEF in June 1998 stated that the PDEF project would utilize the existing 115kV "Columbia Tap" overhead transmission lines to export power to the grid.

In contrast to the overhead route initially proposed by PDEF, DEC initiated a Detailed Facilities Study with PG&E on September 10, 1998 that featured a 230kV *underground transmission route* through the Eighth Street corridor interconnecting DEC to the Pittsburg Power Plant switchyard. DEC's intention to use an underground transmission route was further described to CEC staff during the DEC pre-filing workshop on October 14. In addition, there were several subsequent DEC meetings with the City of Pittsburg and a formal presentation before the Pittsburg Community Advisory Committee in October and November describing DEC's intention to underground its transmission line through Eighth Street. These DEC intentions included a commitment to the City of Pittsburg to assist the City in creating a greenbelt or park within the corridor per the City's master plan.

On December 11, nearly three months after DEC has initiated its Detailed Facilities Study with PG&E, PDEF filed a supplement to the PDEF Application For Certification indicating its preference for a new transmission route that included undergrounding through the Eighth Street corridor. The DEC Application For Certification was filed a week later on December 18.

The City of Pittsburg acknowledges that with the two projects, there may be encroachment into the side streets that parallel the existing 50 foot easement through the Eighth Street corridor. Further, the City of Pittsburg has requested that both PDEF and DEC collaborate in the development of the corridor in order to minimize construction impacts. DEC has on several occasions publicly committed to work with PDEF and the City on the corridor, with the sole purpose of reducing disturbance to the area during construction.

Given the chronology of events, Calpine/Bechtel do not believe that a preferential right exists for the use of the Eighth Street corridor for the installation of the PDEF underground line, based on the original PDEF Application for Certification filing date. In addition, the CEC staff may not be fulfilling its obligation under CEQA by leaving this issue unresolved and simply stating that "it is uncertain at this time how the City of Pittsburg will handle this situation...." (Staff Assessment, p. 143.)

B. OTHER MATTERS THAT MAY REQUIRE ADJUDICATION

As discussed in the section regarding topics not complete and not ready to proceed, Calpine/Bechtel have considerable concerns about the resolution of issues related to air quality, water resources, and transmission system engineering. Moreover, Calpine/Bechtel are concerned about the scope of the cumulative impacts analysis that must be performed by the CEC staff in light of the existence of both the DEC project and the PDEF project. Further, Calpine/Bechtel notes that additional information on issues such as air quality will not be available until the CEC staff files its April 12, 1999 testimony. Accordingly, Calpine/Bechtel reserve the right to identify further issues upon receipt and review of new and additional information to be submitted by the CEC staff, the Cal-ISO staff, and others as it becomes available during the course of this proceeding.

WITNESSES

Calpine/Bechtel sponsor the following witnesses:

1. Air Quality:
Gary Rubenstein
Sierra Research
1801 J Street
Sacramento, CA 95814

2. Water Resources:
Noel Williams
CH₂M Hill
2485 Natomas Park Drive, Suite 600
Sacramento, CA 95833

3. Transmission System Engineering and Land Use:
Doug Buchanan
Bechtel Enterprises
6700 Koll Center Parkway, Suite 200
Pleasanton, CA 94566

Resumes for Gary Rubenstein, Noel Williams, and Doug Buchanan are attached.

In the areas of Air Quality, Water Resources, and Transmission System Engineering Calpine/Bechtel cannot estimate the length of time its direct testimony will take since the information upon which the testimony will be based has not yet been completed and filed for review and comment.

In the area of Land Use, Calpine/Bechtel estimate that its direct testimony will take less than one hour.

Calpine/Bechtel reserves the right to add additional witnesses and expand the time reserved for direct testimony upon the upon receipt and review of new and additional information to be submitted by the CEC staff, the Cal-ISO staff, and others as it becomes available during the course of this proceeding.

EXHIBITS

Calpine/Bechtel intends to submit the PG&E cover letter, title page, and table of contents, and first page of the Detailed Facilities Study prepared by PG&E for the Delta Energy Center, setting forth the date the study was initiated and the scope of the study.

Calpine/Bechtel reserves the right to add additional exhibits upon the upon receipt and review of new and additional information to be submitted by the CEC staff, the Cal-ISO staff, and others as it becomes available during the course of this proceeding.

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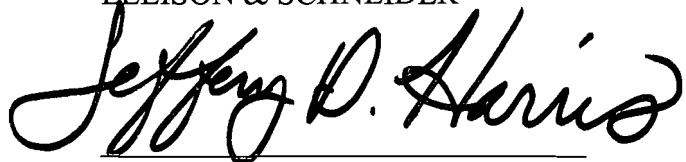
COMMENTS ON REVISED SCHEDULE

Calpine/Bechtel have identified above several areas where there seem to be incongruities between the Revised Scheduling Order and the availability of certain information. Accordingly, Calpine/Bechtel reserves the right to comment on the revised schedule upon receipt and review of new and additional information to be submitted by the CEC staff, the Cal-ISO staff, and others as it becomes available during the course of this proceeding.

Dated 3-25-99

Respectfully submitted by:

ELLISON & SCHNEIDER

A handwritten signature in black ink that reads "Jeffery D. Harris". The signature is written in a cursive style and is positioned above a horizontal line.

Jeffery D. Harris
Attorneys for Calpine/Bethel

Résumé

Gary S. Rubenstein

Education

1973, B.S., Engineering, California Institute of Technology

Professional Experience

August 1981 - Present Senior Partner
 Sierra Research

As one of the founding partners of Sierra Research, responsibilities include project management, and technical and strategy analysis in all aspects of air quality planning and strategy development; emission control system design and evaluation; rulemaking development and analysis; vehicle inspection and maintenance program design and analysis; and automotive emission control design, from the initial design of control systems to the development of methods to assess their performance in customer service. As the Partner responsible for Sierra Research's activities related to stationary sources, he has supervised the preparation of control technology assessments, environmental impact reports and permit applications for numerous industrial projects, including over 2000 megawatts of electrical generating capacity, in the Western United States.

Mr. Rubenstein has worked on the following key projects while with Sierra: preparation of the 1986 ozone and carbon monoxide nonattainment plans for Kern County, California; preparation of the air quality portions of the EIR/EIS for the controversial expansion of operations at the South Lake Tahoe Airport; preparation and defense of the air quality permit applications for the ACE project, the first utility-scale (90 MW) coal-fired power plant built in California; development of the CALIMFAC model, California's motor vehicle emission factor model; preparation and defense of analyses of the air quality impacts of the proposed merger between Southern California Edison and San Diego Gas & Electric Company, which would have created the country's second largest electric utility; and preparation and defense of analyses of the air quality impacts of the proposed Eagle Mountain Landfill which, when constructed, will be the largest landfill in the United States.

Mr. Rubenstein has presented testimony and served as a technical expert witness before numerous state and local regulatory agencies, including the U.S. Environmental Protection Agency, California State Legislative Committees, the California Air Resources Board, the California Energy Commission, the California Public Utilities Commission, the South

Coast and Bay Area Air Quality Management Districts, several rural California air pollution control districts, the Hawaii Department of Health, and the Alabama Department of Environmental Management. Mr. Rubenstein has also served as a technical expert on behalf of the California Attorney General and Alaska Department of Law.

Additional project experience includes the conduct and supervision of projects related to the development of emissions inventories for air quality planning purposes; the assessment of air quality trends; preparation of State Implementation Plans; the development and exercise of motor vehicle emission factor models; the analysis of motor vehicle emission data; and the preparation of legislative and regulatory analyses.

June 1979 - July 1981 Deputy Executive Officer
California Air Resources Board

Responsibilities included policy management and oversight of the technical work of ARB divisions employing over 200 professional engineers and specialists; final review of technical reports and correspondence prepared by all ARB divisions prior to publication, covering such diverse areas as motor vehicle emission standards and test procedures, motor vehicle inspection and maintenance, and air pollution control techniques for sources such as oil refineries, power plants, gasoline service stations and dry cleaners; review of program budget and planning efforts of all technical divisions at ARB; policy-level negotiations with officials from other government agencies and private industry regarding technical, legal, and legislative issues before the Board; representing the California Air Resources Board in public meetings and hearings before the California State Legislature, the California Energy Commission, the California Public Utilities Commission, the Environmental Protection Agency, numerous local government agencies, and the news media on a broad range of technical and policy issues; and assisting in the supervision of over 500 full-time employees through the use of standard principles of personnel management and motivation, organization, and problem solving.

July 1978 - July 1979 Chief, Energy Project Evaluation Branch
Stationary Source Control Division
California Air Resources Board

Responsibilities included supervision of ten professional engineers and specialists, including the use of personnel management and motivation techniques; preparation of a major overhaul of ARB's industrial source siting policy; conduct of negotiations with local officials and project proponents on requirements and conditions for siting such diverse projects as offshore oil production platforms, coal-fired power plants, marine terminal facilities, and almond-hull burning boilers.

During this period, Mr. Rubenstein was responsible for the successful negotiation of California's first air pollution permit agreements governing a liquefied natural gas terminal, coal-fired power plant, and several offshore oil production facilities.

October 1973 -
July 1978

Staff Engineer
Vehicle Emissions Control Division
California Air Resources Board

Responsibilities included design and execution of test programs to evaluate the deterioration of emissions on new and low-mileage vehicles; detailed analysis of the effect of California emission standards on model availability and fuel economy; analysis of proposed federal emission control regulations and California legislation; evaluation of the cost-effectiveness of vehicle emission control strategies; evaluation of vehicle inspection and maintenance programs, and preparation of associated legislation, regulations and budgets; and preparation of detailed legal and technical regulations regarding all aspects of motor vehicle pollution control. Further duties included preparation and presentation of testimony before the California Legislature and the U.S. Environmental Protection Agency; preparation of division and project budgets; and creation and supervision of the Special Projects Section, a small group of highly trained and motivated individuals responsible for policy proposals and support in both technical and administrative areas (May 1976 to July 1978).

Certifications

Qualified Environmental Professional, Institute of Professional Environmental Practice, 1994

Professional Associations

Air & Waste Management Association

Society of Automotive Engineers

Noel J. Williams

Water Resources Specialist

Education

Ph.D., Limnology, University of California, Davis
B.S., Zoology, University of California, Davis

Distinguishing Qualifications

- More than 25 years' experience predicting and analyzing water quality-related problems
- Knowledge of the biology and ecology of many aquatic environments
- Officially commended by Assistant Secretaries of the Interior for saving the federal government more than \$100 million and for resolving controversies among disagreeing organizations

Relevant Experience

Dr. Williams specializes in prediction and analysis of water quality-related problems. His particular skills are construction and application of water quality and hydrologic models; statistical analysis and experimental design; design and management of large-scale field programs; application of bioassay techniques to problems associated with eutrophication, toxicity, and public health; and knowledge of the biology and ecology of many aquatic environments. Related assignments follow:

- **Equivalent Protection Study, Chevron USA, California.** Determined the impacts of refinery process and cooling wastewater on the water quality and biota of San Francisco Bay. This study encompassed bay and estuarine hydrodynamic investigations; marsh, fish, and benthic inventories; onsite flow-through bioassays; and analysis of impacts of organic and metal pollutants in refinery process wastewater. This study resulted in significant improvements in the location and quality of the discharge.
- **San Francisco Bay Combined Sewer Overflow Study, City and County of San Francisco, California.** Conducted the combined sewer overflow (CSO) project for the City and County of San Francisco. This project involved estimating impacts of CSOs on San Francisco Bay. Investigations included water quality, benthic and fish sampling, dye releases, and system modeling. The Regional Water Quality Control Board used the results of this study to determine the acceptable frequency of overflows into the bay and to determine system improvements necessary to meet those limits.
- **Predesign Studies for Southwest Ocean Outfall, City and County of San Francisco, California.** Managed the oceanographic predesign studies for the City and County of San Francisco's Southwest Ocean Outfall. Studies included biological and ocean current monitoring, development of dilution and wastefield transport models, and prediction of the impacts of wastewater discharge on the ocean environment. This project required working closely with the outfall's hydraulic and structural designers in order to develop the most cost-effective solution to the safe ocean discharge of treated municipal

Noel J. Williams

wastewater. Post-construction performance tests conducted on the operating outfall have shown that the design criteria developed during the predesign studies have resulted in the achievement of water quality goals.

- **Point Woronzof 301(h) Waiver Application, Municipality of Anchorage, Alaska.** Conducted the Municipality of Anchorage 301(h) Waiver project, which involved preparation of an NPDES permit application and supporting analysis for a waiver from Clean Water Act secondary treatment requirements. Studies included analysis of water quality and biological impacts and development of discharge limitations. This project has resulted in the saving of unnecessary wastewater treatment expenditure by the people of Anchorage while at the same time protecting the environment.
- **Kesterson Reservoir Cleanup Plan, U.S. Bureau of Reclamation.** Conducted biological monitoring and risk assessment studies at the selenium-contaminated Kesterson Reservoir to develop and evaluate a range of cleanup alternatives. As a result of these investigations, he developed a low-cost and innovative cleanup strategy that was supported by the regulatory and resource agencies. The project received a commendation from the U.S. Secretary of Interior for saving the federal government more than \$100 million and for working cooperatively with other organizations to develop the best possible cleanup plan.
- **Wasteload Allocations for Fox and Wisconsin Rivers, Industry River Study Committee.** Investigated the Fox and Wisconsin Rivers and Lake Michigan for the Industry River Study Committee to determine discharge guidelines for more than 30 industries and municipalities. The program involved river water quality sampling, development of dynamic river water quality models, and simulation of simultaneous discharge on the river system. The program resulted in fair and equitable waste load allocations for the participating agencies.
- **General Environmental Services for ARCO Alaska at Prudhoe Bay, Alaska.** Developed and managed a 3-year general environmental services contract for ARCO Alaska at Prudhoe Bay. The services included design, testing, and implementation of relatively low-cost bioremediation cleanup procedures for application to local oil and hazardous material spills. He also constructed ocean, lake, and stream water-quality models for analysis of impacts of wastewater discharge and provided analysis and expert testimony for the acquisition of National Pollutant Discharge Elimination System (NPDES) permits.
- **River Water Quality Modeling.** Constructed, applied, and reviewed river water quality models in Alaska, Washington, Oregon, California, Montana, Nevada, Wyoming, Australia, and New Zealand. Also has constructed and reviewed water quality impact models for CSOs and stormwater projects in Boston, Milwaukee, Denver, Portland, Anchorage, and Palo Alto.
- **301(h) Waiver Applications.** Managed the preparation of 301(h) Waiver Applications, including dilution and wastefield transport analysis, for San Francisco, East Bay Municipal Utility District, Hollywood, Virginia Key, North Miami, Port Angeles, Delray Beach, San Diego, and Oxnard.

DOUGLAS W. BUCHANAN

SUMMARY: Twenty TwoYears Project Experience: Business and project development; financial and economic analysis, engineering and management; project schedule and cost management, power generation engineering design, power plant operations and plant startup.

EXPERIENCE: Since 1991, responsible for identifying and managing the development of independent power, cogeneration and infrastructure projects for Bechtel Enterprises (BEn) in North America and more recently international projects. Mr. Buchanan's responsibilities include identifying and creating project opportunities for BEn, forming strategic alliances, assessing competitive position, developing the project commercial structure, including scope and schedule, negotiating critical contracts and facilitating BEn project financing services. Recent experience includes the successful bidding of 3500MW of independent power projects in Turkey plus the development of water and airport infrastructure projects in Brazil and Chile.

Prior to joining Bechtel Enterprises, Mr. Buchanan worked with PG&E Enterprises both as a project developer and in business development. He was instrumental in the initiation and creation of PG&E Operating Services Company, an operation and maintenance services firm. This work included development of the company business plan, market assessment and the obtaining of board funding for company startup leading to incorporation.

Mr. Buchanan's earlier experience includes performing as a project management engineer for PG&E, developing and implementing major power plant overhaul schedules and plant financial and cost management systems, including plant income statements and budget programs.

Mr. Buchanan began his career with Bechtel Power, performing as a fossil power plant design engineer on boiler/turbine and balance of plant systems. This led to a position as a startup engineer on the 500MW Boardman coal project, a project delivered on schedule and within budget.

**PROFESSIONAL
DATA:**

Registered Professional Mechanical Engineer, California (M19858)

STATE OF CALIFORNIA

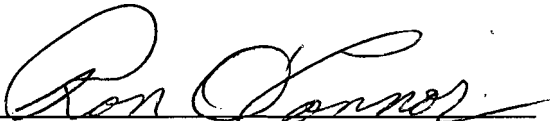
Energy Resources Conservation
and Development Commission

In the Matter of:)
)
Application for Certification Petition for) Docket No. 98-AFC-1
PITTSBURG DISTRICT ENERGY FACILITY)
_____)

PROOF OF SERVICE

I, Ron O'Connor, declare that on March 25, 1999, I deposited copies of the attached *Prehearing Conference Statement of Calpine Corporation and Bechtel Enterprises, Inc.* in the United States mail in Sacramento, California, with first-class postage thereon fully prepaid and addressed to all parties on the attached service list.

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



Ron O'Connor

SERVICE LIST

98-AFC-1

Samuel L. Wehn, Project Director
Attn: Pittsburg Energy Facility
Enron Capital & Trade Resources Corp.
101 California Street, Suite 1950
San Francisco, CA 94111

Allan J. Thompson, Esq.
21 "C" Orinda Way, No. 314
Orinda, CA 94563

Robert Ray, Project Manager
URS Greiner Woodward Clyde
130 Robin Hill Rd., Ste. 100
Santa Barbara, CA 93117

California Unions for Reliable Energy
Mark D. Joseph, Esq.
Katherine S. Poole, Esq.
Adams Broadwell & Joseph
651 Gateway Blvd., Suite 900
South San Francisco, CA 94080

William V. Manheim, Esq.
Kelly M. Morton, Esq.
Law Department
Pacific Gas and Electric Company
P.O. Box 7442
San Francisco, CA 94120

Calpine Corporation
Attn: Maura Hernandez
6700 Koll Center Parkway, Ste.200
Pleasanton, CA 94566

City of Antioch
Att: William R. Galstan, City Atty.
Third and "H" Streets
P. O. Box 5007
Antioch, CA 93431-5007

Thomas M. Barnett, VP
High Desert Power Project
3501 Jamboree Rd., S. Tower, Ste. 606
Newport Beach, CA 92660

Jeffrey C. Kolin, City Manager
City of Pittsburg
2020 Railroad Avenue
Pittsburg, CA 94565

Michael Ramsey, City Manager
City of Antioch
P.O. Box 5007
Antioch, CA 94531-5007

Ray Menebroker
ARB Stationary Source Div.
Project Assessment
P.O. Box 2815
Sacramento, CA 95815-2815

Paul Causey
Delta Diablo Sanitation District
2500 Pittsburg-Antioch Highway
Antioch, CA 94509-1373

John Waithman
California Department of Fish & Game
7329 Silverado Trail
Napa, CA 94558

Dennis Jang
Bay Area Air Quality Management District
939 Ellis Street
San Francisco, CA 94109

Matt Haber, Chief of Permits Office
U.S. Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105-3901

Ed Wylie
U.S. Army Corps of Engineers
333 Market Street
San Francisco, CA 94105-2197

Richard Corey
ARB Stationary Source Division
Project Assessment
P.O. Box 2815
Sacramento, CA 95815-2815

Jeff Miller
California Independent System Operator
151 Blue Ravine Road
Folsom, CA 95630