Locke Lord LLP
Attorneys & Counselors

500 Capitol Mall, Suite 1800
Sacramento, CA 95814
Telephone: 916-930-2500
Fax: 916-930-2501
www.lockelord.com

John A. McKinsey
Direct Telephone: 916-930-2527
Direct Fax: 916-720-0443
jmckinsey@lockelord.com

July 18, 2013

Via E-Mail and Hand Delivery

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Re: El Segundo Power Plant Project (00-AFC-14C)
Applicant's Letter dated July 17, 2013
to South Coast Air Quality Management District

Dear Sir/Madam:

On behalf of El Segundo Power Plant Project, enclosed please find for docketing Applicant's letter dated July 17, 2013, to South Coast Air Quality Management District.

Please don't hesitate to contact me if you have any questions regarding this filing.

Very truly yours,

John A. McKinsey

JAM:dh
Enclosure

July 17, 2013

sierra research

1801 J Street
Sacramento, CA 95811
Tel: (916) 444-6666
Fax: (916) 444-8373

Ann Arbor, MI
Tel: (734) 761-6666
Fax: (734) 761-6755

Kenneth L. Coats
AQ Engineer II
South Coast Air Quality Management District
21865 E. Copley Drive
Diamond Bar, CA 91765

Subject: El Segundo Power Facility Modification Project – SCAQMD Permit Application

Dear Mr. Coats:

The following are responses to requests for additional clarifying information contained in the June 25, 2013 email from you to Tom Andrews regarding the March 2013 permit application for the proposed El Segundo Power Facility Modification Project.

Request: Please fill in the following tables for the GE7FA and the Trent 60. Some of this information may need to come from the manufacturer. I need this information to calculate the lb/net MWh for GHGs.

Response: Responses are provided below.

GE7FA Baseload	45% Load (Cold Low)	100% Load (Cold Peak with duct burners)
Base load operation (hours per year)	Note 1	Note 1
CTG power output, gross (MW)[3]	100	222
ST power output, gross (MW)[3]	65	112
Plant Auxiliary Load, (MW)	6	8
Plant Output, net (MW)[4]	159	325
CCGS heat rate, net (Btu/kw-h, LHV)	7,480	6,754
Fuel input (MMBtu/hr, HHV)[5]	1,319	2,436
Fuel input (MMBtu/hr, LHV)[6]	1,190	2,197
Total fuel usage, per year (mmscf)	Note 2	Note 2

[1]See Table D-2 of the permit application for annual operating hour assumptions used as basis for emission calculations.
[2]See Table G-3 of the permit application for annual fuel usage assumptions used for GHG emission calculations.
[3]From Permit Application Table B-1.
[4]From Petition to Amend Table 1-2A
[5]Sum of CTG input and duct burner input from Permit Application Table B-1
[6]HHV/LHV = 1.108

GE7FA Fast-Start	Totals Over 30 Minute Period[1]
Startup fuel usage (MMBtu, LHV)	728
Average CTG heat rate (Btu/kw-hour)	7,072
Net power output (kw-hour)[2]	103,000

[1]The values in this table correspond to the conditions that form the basis for emission calculations in the permit application. Fuel consumption and power production during the ramp-up to full power (approximately 11 minutes) were added to fuel consumption and power production at unit capacity during the rest of the 30 minute period (approximately 19 minutes).
[2]Email Tom Andrews to Ken Coats (6/12/13)

GE7FA Traditional Start	Totals Over 60 Minute Period [1]
Start-up fuel usage (MMBtu, LHV)	1,563
CTG heat rate (Btu/kw-hour)	7,041
Net power output (kw-hour)[2]	222,000

[1]The values in this table correspond to the conditions that form the basis for emission calculations in the permit application. Fuel consumption and power production during the ramp-up to full power (approximately 20 minutes) were added to fuel consumption and power production at unit capacity during the rest of the 60 minute period (approximately 40 minutes).
[2]Email Tom Andrews to Ken Coats (6/12/13)

GE7FA Shutdown	Totals Over 30 Minute Period [1]
Shutdown fuel usage (MMBtu, LHV)	765
CCGS heat rate (Btu/kw-hour)	7,496
Net power output (kw-hour)[2]	102,000

[1]The values in this table correspond to the conditions that form the basis for emission calculations in the permit application. Fuel consumption and power production during the ramp-down from full power (approximately 14 minutes) were added to fuel consumption and power production at unit capacity during the rest of the 30 minute period (approximately 16 minutes).
[2]Email Tom Andrews to Ken Coats (6/12/13)

Trent 60 Baseload	55% Load (Hot Low)	100% Load (Mild Base Cooler)
Base load operation (hours per year)	Note 1	Note 1
CTG power output, gross (MW)[3]	23	57
Plant Auxiliary Load, (MW)	1	2
Plant Output, net (MW)[4]	22	55
SCGS heat rate, net (Btu/kw-h, LHV)	11,842	8,321
Fuel input (MMBtu/hr, HHV)	292	516
Fuel input (MMBtu/hr, LHV)[5]	264	466
Total fuel usage, per year (mmscf)	Note 2	Note 2

[1]See Table D-2 of the permit application for annual operating hours used as basis for emission calculations.
[2]See Table G-3 of the permit application for annual fuel usage assumptions used for GHG emission calculations.
[3]From Permit Application Table B-2.
[4]From Petition to Amend Table 1-2A
[5]HHV/LHV = 1.108

Trent 60 Start-Up	Totals Over 30 Minute Period [1]
Start-up fuel usage (MMBtu, LHV)	181
CTG heat rate (Btu/kw-hour)	9,504
Net power output (kw-hour)[2]	18,700

[1]The values in this table correspond to the conditions that form the basis for emission calculations in the permit application. Fuel consumption and power production during the ramp-up to full power (approximately 10 minutes) were added to fuel consumption and power production at unit capacity during the rest of the 30 minute period (approximately 20 minutes).
[2]Email Tom Andrews to Ken Coats (6/12/13)

Trent 60 Shutdown	Totals Over 20 Minute Period [1]
Shutdown fuel usage (MMBtu, LHV)	91
CTG heat rate (Btu/kw-hour)	18,299
Net power output (kw-hour)[2]	4,670

[1]The values in this table correspond to the conditions that form the basis for emission calculations in the permit application. Fuel consumption and power production during the ramp-down from full power (approximately 15 minutes) were added to fuel consumption and power production at unit capacity during the rest of the 20 minute period (approximately 5 minutes).
[2]Email Tom Andrews to Ken Coats (6/12/13)

El Segundo Power appreciates the efforts that the District has made in its review of the ESPFM application.

Sincerely,

Tom Andrews

cc: Craig Hoffman, CEC Project Manager
George Piantka, NRG
Ken Riesz, NRG
Steve Odabashian, NRG