



E&L Westcoast, LLC

ANDREW C. WELCH, P.E.

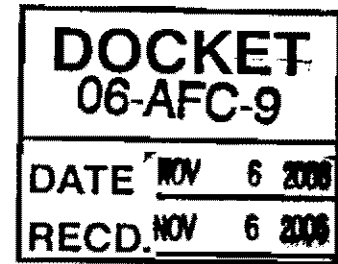
PROJECT MANAGER

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November 6, 2006

Mr. B.B. Blevins
Executive Director
California Energy Commission
1516 Ninth Street
Sacramento, California 95814



Dear Mr. Blevins:

RE: Submittal of Application for Certification—Colusa Generating Station

Enclosed please find E&L Westcoast, LLC's Application for Certification (AFC) to build and operate a new power plant in northern Colusa County. This project is a nominal 660 MW gas-fired combined-cycle generation facility. It will interconnect to PG&E's Cottonwood to Vacadixon 230 kV lines via a new substation to be built at the site.

This Application is submitted under the six-month process pursuant to Title 20 of the California Code of Regulations (CCR), Division 2, Chapter 5, Article 7, which contains provisions for considering expedited applications under Public Resources Code Section 25550. In order to facilitate your review of the data requirements for processing this AFC under the six-month process, we have provided the following summary.

- In addition to containing all of the information outlined in Appendix B of the California Energy Commission (CEC) regulations, the AFC contains a description of all applicable laws, ordinances, regulations and standards (LORS) and a discussion of the project's compliance. Within each resource category, the AFC also contains a table of additional permits and anticipated processing schedules.
- 20 CCR 2022 (b) (2) (A) requires a cumulative air quality impact analysis of all proposed stationary emissions sources within a 6-mile radius of the proposed site. Only one such source exists, and the project in combination with this source will not result in significant cumulative air quality impacts. Modeling results substantiating this conclusion are included in the AFC.
- The Air Quality section of the AFC (Section 8.1) includes a description of the initial commissioning phase of the project and demonstrates through air dispersion modeling that emissions during initial commissioning do not cause new violations of state or federal ambient air quality standards for the criteria

pollutants. This analysis demonstrates compliance with 20 CCR 2022 (b) (2) (B).

- The project will not emit any criteria air pollutants that currently exceed state or federal ambient air quality standards that will not be offset.
- The Public Health section of the AFC (Section 8.6) contains a modeling analysis that demonstrates that the project will not result in public exposure to toxic air contaminants that would be considered significant impacts, thereby complying with 20 CCR 2022 (b) (2) (D).
- The project will not need waste discharge requirements from the Regional Water Quality Control Board because wastewater will be disposed of in a zero-liquid discharge system as described in Sections 3.4.7.1 and 8.13.2.1.2. Therefore, the AFC need not contain the information required by 20 CCR Section 2022 (b) (2) (E).
- The Biological Resources section of the AFC (Section 8.2) describes biological survey methodology, results, and mitigation measures that demonstrate that the project will not have significant impacts on wetlands or special-status plant or animal species. This section contains the information necessary to comply with 20 CCR Section 2022 (b) (2) (F).
- The Hazardous Materials Handling section of the AFC (Section 8.12) contains a modeling analysis demonstrating compliance with 20 CCR Section 2022 (b) (2) (G) and (H). The project will use aqueous ammonia to reduce air emissions, but the project does not expose public receptors to unacceptable risks associated with a release of ammonia from either the storage tank or from an accident associated with a release during unloading of a tanker truck.
- The AFC also demonstrates in Section 3.4.8 that the project will not store gaseous flammable or explosive materials in quantities greater than 25,000 standard cubic feet in compliance with 20 CCR 2022 (b) (2) (I).
- Appendix F contains a System Impact study demonstrating that the project will not result in significant adverse impacts on the electrical system, as required by 20 CCR Section 2022 (b) (3). A summary of the results of the study is provided in Chapter 5 of the AFC.
- Section 8.8.3 of the AFC contains an environmental justice evaluation as specified in 20 CCR Section 2022 (b) (4). The evaluation demonstrates that the project will not have a disproportionate impact on low-income or minority populations.
- A discussion of project ownership and site control as required by 20 CCR Section 2022 (b) (5) (A) is contained in Section 1.5 of the AFC.

- The will-serve letter from Glenn-Colusa Irrigation District as required by 20 CCR Section 2022 (b) (5) (B) is included as Figure 7.1-1 of the AFC.

This submittal includes one original and 60 paper copies of the AFC (each is a two-volume set), and 65 copies on CD.

E&L Westcoast requests that any questions or discussion regarding this submittal be directed to:

Andrew C. Welch
E&L Westcoast, LLC
8403 Colesville, Suite 915
Silver Spring, Maryland 20910

and that the service list for the Application proceeding also include copies to:

Michael J. Carroll
Latham & Watkins LLP
650 Town Center Drive, Suite 2000
Costa Mesa, California 92626

and

Dale D. Shileikis
URS Corporation
221 Main Street, Suite 600
San Francisco, California 94105

E&L Westcoast, LLC believes that this plant is situated in an ideal location from the perspective of available infrastructure and environmental concerns. We look forward to the opportunity to work with the Commission as it begins its review of this Application.

Yours very truly,



Andrew C. Welch

1 IN THE MATTER OF THE APPLICATION) VERIFICATION IN SUPPORT OF
2 FOR THE CERTIFICATION OF COLUSA) THE APPLICATION FOR
3 GENERATING STATION) CERTIFICATION OF COLUSA
4 DOCKET NO. _____) GENERATING STATION

5 I, Andrew Welch, Project Manager, E&L Westcoast, LLC, Applicant in the
6 above-referenced matter, am authorized to make this verification on behalf of E&L Westcoast,
7 LLC.

8 I have read and know of the contents of the Application for Certification for the
9 Colusa Generating Station. ("Application").

10 I am informed and believe that the matters stated in the Application are true and
11 on that ground I allege that the matters stated therein are true.

12 I declare under penalty of perjury that the foregoing is true and correct. Executed
13 on November 1, 2006, at 221 Main Street, Suite 600, San Francisco, CA 94105.

14 
15 _____
Andrew Welch