

DOCKETED

Docket Number:	07-AFC-06C
Project Title:	Carlsbad Energy Center - Compliance
TN #:	237517
Document Title:	California Energy Commission's Response Letter to Ms Siekmann's Complaint regarding violation of AQ-SC9
Description:	California Energy Commission's Response Letter to Ms. Siekmann's Complaint regarding ACECP's violation of Air Quality Condition of Certification AQ-SC9.
Filer:	Anwar Ali
Organization:	California Energy Commission
Submitter Role:	Commission Staff
Submission Date:	4/21/2021 5:27:08 PM
Docketed Date:	4/22/2021



April 21, 2021

Ms. Kerry Siekmann
Terramar Community Association
siekmann1@att.net

**CARLSBAD ENERGY CENTER PROJECT (07-AFC-06C) – ALLEGED
VIOLATION OF AIR QUALITY CONDITION OF CERTIFICATION AQ-SC9**

Dear Ms. Siekmann:

Thank you for your interest in ensuring operational compliance of the Carlsbad Energy Center Project (ACECP). In your filed complaint to the California Energy Commission (CEC) dated January 8, 2021, you ask whether the project violated the Condition of Certification **AQ-SC9** throughout 2019 and the first three quarters of 2020.

Staff reviewed the ACECP Commission Decision and the Complaint Report/Resolution Form filed by Carlsbad Energy Center LLC. on February 10, 2021.

AQ-SC9 specifies that the gas turbines shall only be operated between the military time hours of 0600 to 2400, except in the event of a California Independent System Operator (ISO) declared emergency. As the operational time restrictions in **AQ-SC9** were not considered in the ambient air quality impacts assessment, operation outside the hours listed in **AQ-SC9** would not result in impacts beyond what was analyzed as part of the Commission Decision.

AQ-SC9 is not related to project air quality emissions and potential air quality impacts. Instead it results from the Condition of Certification **NOISE-4**, which was modified to reflect a 2014 settlement agreement between the City of Carlsbad, San Diego Gas & Electric (SDG&E) and CECL/Cabrillo Power LLC. Based on that agreement, the project is allowed to operate to the extent reasonably required for reliability-related purposes, in addition to any California

ISO declared emergency. In response to a CAISO-scheduled dispatch to occur at say, 0600 hours (6:00 am), the project needs to initiate startup several minutes before 0600 to ramp-up to the dispatch power level by 0600, and at the end of dispatch, needs several minutes after say, 2400 hours, for the turbines to spin down for cooling to final shutdown.

Staff also noticed that ACECP's Continuous Emissions Monitoring System (CEMS) internal clocks are not adjusted for local Daylight Savings Time. Therefore, the reported CEMS clocks will record the time as 1 hour behind local time during that period of the year when Daylight Savings Time is in effect.

You also requested the CEC to "...deny the Amended Modified Startup be allowed..." While Carlsbad Energy Center LLC filed the original petition on February 3, 2020, the petition is currently under revision by the project owner. Once the revision is finalized, staff will conduct a comprehensive review of the final petition to verify that the requested modification would not create any significant air quality impacts. Because the petition is under current revision, staff cannot recommend any particular action on the petition at this time. When the revised petition is resubmitted, it will be docketed to allow for public review.

I want to assure you that the CEC's process for review and approval of proposed project changes verifies that they will comply with the project's conditions of certification, and applicable laws, ordinances, regulations, and standards in order to prevent any significant environmental impacts.

If you have any questions or concerns, please contact Anwar Ali, Compliance Project Manager, at (916) 698-7498, or via e-mail at anwar.ali@energy.ca.gov

Sincerely,

Elizabeth Huber

Elizabeth Huber
Manager
Compliance Monitoring and Enforcement
Siting, Transmission and Environmental
Protection