

**DOCKETED**

<b>Docket Number:</b>	07-AFC-06C
<b>Project Title:</b>	Carlsbad Energy Center - Compliance
<b>TN #:</b>	259476
<b>Document Title:</b>	CECL Comments on PTA Staff Analysis
<b>Description:</b>	CECL Comments on PTA Staff Analysis
<b>Filer:</b>	Timothy R Sisk
<b>Organization:</b>	NRG Energy Inc
<b>Submitter Role:</b>	Applicant
<b>Submission Date:</b>	10/7/2024 3:59:22 PM
<b>Docketed Date:</b>	10/7/2024



**Carlsbad Energy Center LLC**  
4950 Avenida Encinas  
Carlsbad, CA 92008  
Phone: 760-710-3970

October 4, 2024

Anwar Ali, Ph.D.  
Compliance Project Manager  
Carlsbad Energy Center Project (07-AFC-06C)  
California Energy Commission  
1516 Ninth Street (MS-2000)  
Sacramento, CA 95814

**Subject: Comments on Staff Analysis - Petition to Amend Air Quality Conditions of Certification For Amended Carlsbad Energy Center Project**

Dear Dr. Ali:

Carlsbad Energy Center LLC ("Project Owner") reviewed the California Energy Commission (CEC) Staff Analysis prepared in response to Project Owner's Petition to Amend Air Quality Conditions of Certification (COC) for the Amended Carlsbad Energy Center Project (ACECP). CEC staff did an excellent job in summarizing the potential for environmental impacts from the proposed project changes and addressing comments from the public. We identified minor edits and clarifications that do not affect the Staff Analysis. Those edits and clarification are presented below for Staff consideration.

1. In the Petition submitted by CECL, there were two COCs (AQ-37 and AQ-99) with edits and clarifications: add **by volume** after carbon dioxide in AQ-37 and add **am** and **pm** to the times in AQ-99. These 2 COCs were not listed with the modified COCs nor included in the revised COC text in the Staff Analysis. Please consider the following edits to respective COCs in the final Staff Analysis to be presented for the Business Meeting when this item is presented.
  - a. **AQ-37** The discharge of particulate matter from the exhaust stack of each combustion turbine shall not exceed 0.10 grains per dry standard cubic foot (0.23 grams/dscm) corrected to 12 percent carbon dioxide **by volume**. The District may require periodic testing to verify compliance with this standard. [Rule 53]
  - b. **AQ-99** This engine shall not operate for non-emergency use during the following periods, as applicable:
    - (a) Whenever there is any school sponsored activity if engine is located on school grounds, or
    - (b) Between 7:30**am** and 3:30**pm** on days when school is in session, if the engine is located within 500 feet of, but not on, school grounds.This condition shall not apply to an engine located at or near any school grounds that also serve as the student's students' place of residence. [17CCR §93115]

2. In the complete text of the revised COCs AQ-49, AQ-50, and AQ-95, there are a line breaks that if addressed, will help with the presentation of these COCs (e.g., "**(AQ-SC8)**" should be on the same line as "...**Operations Reports**" (not below it).
3. Finally, there are two typos:
  - a. On page 2 of the cover memo "**SDAQMD**" should be "**SDAPCD**"
  - b. The footer on pages 1-3 of the Executive Summary should be "**September**" (not "**Septmeber**")

We look forward to the consideration of this amendment during a future CEC Business Meeting.

If you have any questions or comments regarding these proposed edits and clarifications, please do not hesitate to contact Timothy Sisk at (860) 334-8081.

Sincerely,



Paul Mattesich  
Plant Manager  
Carlsbad Energy Center LLC

cc: Timothy Sisk, NRG  
Ryan Stewart, NRG/CECL  
George Piantka, NRG