

## DOCKETED

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August 8, 2013

*By Electronic Submission:* [docket@energy.ca.gov](mailto:docket@energy.ca.gov)  
California Energy Commission  
Attn: Craig Hoffman, Compliance Project Manager  
Dockets Unit, MS-4  
Docket No. 03-AFC-2C  
1516 Ninth Street  
Sacramento, CA 95814-5512

Re: Docket # 03-AFC-2C  
Los Esteros Critical Energy Facility Phase 2  
Comments by the Project Owner on the California Energy Commission Staff  
Analysis of Proposed Air Quality Amendments

Dear Mr. Hoffman:

Los Esteros Critical Energy Facility, LLC (hereinafter, "Project Owner") appreciates the opportunity to submit these comments on the California Energy Commission ("CEC") Staff Analysis of Proposed Air Quality Amendments for the Los Esteros Critical Energy Facility Phase 2 project ("LECEF")(collectively, "Staff Analysis").<sup>1</sup> We appreciate that Staff recommends approval of the proposed air quality amendments at the Commission's August 27, 2013 Business Meeting.<sup>2</sup>

We recommend a minor modification to the first sentence of Condition of Certification AQ-48 set forth in the Staff Analysis. We recommend that this sentence be revised as follows:

S14 is a GE LM6000 turbine that is equivalent to the four existing gas turbines and is used ~~brought in~~ as a substitute while one of the existing turbines is being maintained.

<sup>1</sup> The Staff Analysis is available at: [http://www.energy.ca.gov/sitingcases/losesteros2/compliance\\_phase\\_1/2013-07-22\\_Staff\\_analysis\\_of\\_proposed\\_AQ\\_Amendments.pdf](http://www.energy.ca.gov/sitingcases/losesteros2/compliance_phase_1/2013-07-22_Staff_analysis_of_proposed_AQ_Amendments.pdf).

<sup>2</sup> Cover Letter from Craig Hoffman, Compliance Project Manager, CEC, re: LECEF Staff Analysis, at 2 (July 22, 2013), available at: [http://www.energy.ca.gov/sitingcases/losesteros2/compliance\\_phase\\_1/2013-07-22\\_Staff\\_analysis\\_of\\_proposed\\_AQ\\_Amendments.pdf](http://www.energy.ca.gov/sitingcases/losesteros2/compliance_phase_1/2013-07-22_Staff_analysis_of_proposed_AQ_Amendments.pdf).

Craig Hoffman  
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The first sentence of AQ-48 as proposed in the Staff Analysis could be misleading. By stating that S-14 is “brought in” as a substitute, AQ-48 might imply that S-14 is located elsewhere (i.e., offsite) before being used as a substitute for one of the existing turbines. AQ-48 should not imply that S-14 is stored offsite.

As explained in the Staff Analysis, “[t]he addition of proposed Condition of Certification AQ-48 would allow the facility to *have* a power turbine that could be substituted into any of the four trains at any time.” LECEF Staff Analysis, at 2 (emphasis added); *see also id.* at 18. The use of the word “have” in this context correctly indicates that LECEF could store S-14 onsite at the facility, for use as a substitute for any of the four gas turbines.

This minor clarification to AQ-48 will not change the fact that LECEF conforms with the applicable LORS related to air quality and will not result in significant air quality impacts or any increases to the facility’s emissions profile.

Please contact me at (916) 447-2166 if you have any questions about these comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Gregory L. Wheatland". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Greggory L. Wheatland