

DOCKETED

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August 9, 2013

Via E-Mail and Hand Delivery

El Segundo Energy Center Petition to Amend (00-AFC-14C) Siting Committee
Commissioner Karen Douglas – Presiding Member
Commissioner Janae A. Scott – Associate Member
Paul Kramer – Hearing Officer
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

Re: 00-AFC-014C
Project Owner's Comments Re: Staff Issues Identification Report

Dear Committee Members:

El Segundo Energy Center LLC ("ESEC LLC") files the following comments regarding the "Staff Issues Identification Report" issued by Commission Staff in the Petition to Amend ("PTA") proceeding for the El Segundo Energy Center ("ESEC") project (00-AFC-014C).

ESEC LLC does not have any significant concerns related to the Issues Identification Report and accompanying schedule. ESEC LLC does note, however, that language in the report suggests that Unit 4 at El Segundo Generating Station (ESGS) is scheduled for, or must incur, a shutdown by December 31, 2015. That is not correct. To clarify, El Segundo Power, LLC (NPDES permit holder on behalf of ESGS as well as the owner of ESGS) intends to shut down Unit 4 by December 31, 2015, in order to comply with the California State Water Resource Control Board's (State Water Board's) Once-Through Cooling (OTC) Policy, unless the Statewide Advisory Council for Cooling Water Intake Structures in advising the State Water Board determines that a compliance deadline extension is necessary to maintain electric reliability, and the State Water Board acts to extend ESGS's OTC compliance deadline. Hence, December 31, 2015 in the project schedule represents the current Unit 4 OTC Policy compliance date and the estimated shutdown date for Unit 4 that is aligned with timely achievement of governmental approvals, including the Commission's approval of this PTA and the potential award of a long term power procurement contract for the output of the new units proposed in the PTA.

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ESEC LLC looks forward to working cooperatively with the Commission, the surrounding community and other interested or involved agencies and organizations in seeing that these important changes to ESEC reach fruition.

Very truly yours,



John A. McKinsey

JAM:dh

DECLARATION OF SERVICE

I, Dee Hutchinson, declare that on August 9, 2013, I served and filed copies of Project Owner's Comments Re: Staff Issues Identification Report dated August 9, 2013. The most recent Proof of Service List, which I copied from the web page for this project at: <http://www.energy.ca.gov>, is attached to this Declaration.

(Check one)

For service to all other parties and filing with the Docket Unit at the Energy Commission:

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California Energy Commission – Docket Unit
Attn: Docket No. _____
1516 Ninth Street, MS-4
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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that I am over the age of 18 years.

Dated: August 9, 2013



Dee Hutchinson

Proof of Service List

Docket: 00-AFC-14C

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