

DOCKETED

Docket Number:	85-AFC-03C
Project Title:	Compliance - Application for Certification for Midway-Sunset Cogeneration Project
TN #:	201923
Document Title:	Email response re Efficiency Questions for Midway Sunset Air Quality Petition to Amend
Description:	N/A
Filer:	Mary Dyas
Organization:	Midway Sunset/Ray Smith
Submitter Role:	Applicant
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Dyas, Mary@Energy

From: Ray Smith [RSmith@midwaysunset.com]
Sent: Tuesday, March 18, 2014 2:50 PM
To: Dyas, Mary@Energy; Khoshmashrab, Shahab@Energy; Hughes, Joseph@Energy
Cc: Dave Faiella; Greg Jans; Sandra Henriksen
Subject: RE: Efficiency Questions for Midway Sunset AQ Petition to Amend

Hi Mary,

Thanks for setting up the teleconference with Joseph and Shahab as it was extremely productive. In response, please accept this email as confirmation that MSCC will continue to meet the following verification requirements for **Efficiency 1**:

- A. Monthly fuel use (includes quantity and Btu value) as evidenced by an invoice from the gas supplier.
- B. Monthly electrical sales (includes kWh) as evidenced by an invoice to the Southern California Edison Company.
- C. Monthly steam sales (includes quantity and Btu value) as evidenced by an invoice to Sun Exploration and Production company.
- D. Monthly rate (lbs/month and and heat content in Btu/lb) of feedwater to the 3 HRSGs.

SCC/SSEC shall annually provide CEC staff information describing any partial or total power and/or process steam production curtailment, duration of curtailment, reasons for curtailment, and actions taken or proposed to correct the conditions. The information shall be certified by the plant manager.

MSCC feels that the currently submitted Amendment of Change fulfills the following verification requirement for **Efficiency 2**:

SCC/SSEC shall petition the CEC for approval of any changes to design or operating characteristics as discussed above. Any petition shall be filed in accordance with procedures identified in Appendix C, Compliance Plan General Provisions, Amendments to the Decision.

Thanks again. Please let us know if anything else is needed.

Ray

From: Dyas, Mary@Energy [<mailto:Mary.Dyas@energy.ca.gov>]
Sent: Monday, March 17, 2014 7:00 AM
To: Ray Smith; Khoshmashrab, Shahab@Energy
Cc: Dave Faiella; Greg Jans; Sandra Henriksen
Subject: Efficiency Questions for Midway Sunset AQ Petition to Amend

Hi Ray:

With regards to the MSCC DLN1+ amendment, can you verify that Conditions of Certification Efficiency 1 and 2 are not affected as a result of this change and include an explanation?

Efficiency 1 – Over the lifetime of the project, Sun Cogeneration Company and Southern Sierra Energy Company shall operate the facility as a cogeneration system as proposed in the Application for Certification and certified by this Commission (i.e., operate in accordance with the definition of cogeneration contained in PRC Sections 25134(a) and (b); 18 CFR 292.205(a)(1) and (a)(2)(i)(b); 10 CFR 500.2.

Verification: SCC/SSEC shall file with the California Energy Commission, during each calendar year, an annual report in which monthly average values of the following plant operating parameters will be given:

- A. Monthly fuel use (includes quantity and Btu value) as evidenced by an invoice from the gas supplier.
- B. Monthly electrical sales (includes kWh) as evidenced by an invoice to the Southern California Edison Company.
- C. Monthly steam sales (includes quantity and Btu value) as evidenced by an invoice to Sun Exploration and Production company.
- D. Monthly rate (lbs/month and and heat content in Btu/lb) of feedwater to the 3 HRSGs.

SCC/SSEC shall annually provide CEC staff information describing any partial or total power and/or process steam production curtailment, duration of curtailment, reasons for curtailment, and actions taken or proposed to correct the conditions. The information shall be certified by the plant manager.

Efficiency 2 – No change in the plant baseline design, physical configuration or mode of operation, for example, simple cycle versus cogeneration cycle operation, shall be made without CEC concurrence, if those changes could result in operating characteristics which could not or would not comply with the operational requirements identified in Condition 1.

Verification: SCC/SSEC shall petition the CEC for approval of any changes to design or operating characteristics as discussed above. Any petition shall be filed in accordance with procedures identified in Appendix C, Compliance Plan General Provisions, Amendments to the Decision.

Thanks,
Mary