

DOCKETED

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Carlsbad Energy Center LLC
5790 Fleet Street
Suite 200
Carlsbad, CA 92008-4703

August 1, 2014

VIA OVERNIGHT MAIL AND EMAIL

Ms. Wendy Chambers
Utilities Director
City of Carlsbad
5950 El Camino Real
Carlsbad, CA 92008

**RE: Request for Service for Water Supply and Sewer Interconnection – Amended
Carlsbad Energy Center Project**

Dear Ms. Chambers:

Carlsbad Energy Center LLC, an indirect wholly owned subsidiary of NRG Energy, Inc., is the project owner of the Carlsbad Energy Center Project (CECP). The CECP was approved by the California Energy Commission (CEC) in June 2012. Carlsbad Energy Center LLC has proposed changes to the Licensed CECP that will result in an improved version of the CECP that is referred to as the “Amended CECP.” The Amended CECP is currently under review by the CEC.

As you know, we have been exploring the utilization of California Code of Regulations (CCR) Title 22 reclaimed water as the primary source of water injection for gas turbine emission controls, evaporative cooling for the gas turbines, landscape irrigation, and other incidental uses. We will also require interconnection of the project’s wastewater discharge service (industrial and domestic wastewater) to the City of Carlsbad’s existing sewer infrastructure that runs through the existing facility. In addition to the CCR Title 22 reclaimed water, the new power generating project would also require potable water for non-industrial uses such as water taps, toilets, safety showers, emergency eye washes and fire protection.

It appears the City of Carlsbad has the supply and infrastructure to provide service for reclaimed and potable water, and sewer discharge for the CECP. We believe the best course of action is for Carlsbad Energy Center LLC to request a “Will Serve” letter from the City of Carlsbad to supply the project with reclaimed and potable water, and for the City to provide the interconnection for sewer discharge. A “Will Serve” letter issued by the City will help Carlsbad Energy Center LLC to meet the power plant site certification regulations of the CEC for the new power generating equipment.

The tables below provide the project's requirements for CCR Title 22 reclaimed water and its requirements for potable water on a peak daily and average basis.

Peak Daily Water Use

	<u>Gallons/Minute (gpm)</u>	<u>Gallons/Day</u>
Reclaimed	675	729,000
Potable (normal)	12	17,200
Potable (infrequent/fire water storage refill)	500	150,000

Yearly Average Water Use

	<u>Gallons/Minute (gpm)</u>	<u>Gallons/Year</u>
Reclaimed	210	110,400,000
Potable	12	6,307,700

To support the use of CCR Title 22 reclaimed water for the project's process water, the reclaimed water will be passed through a reverse osmosis system to treat the water to be used by the proposed power generating equipment. This process will return approximately thirty-four percent (34%) of the reclaimed water it received as domestic wastewater discharge to the sewer connection. The table below provides the project's requirement for industrial and domestic sewer discharge on a peak daily and year average basis.

Peak Daily Discharge

	<u>Gallons/Minute (gpm)</u>	<u>Gallons/Day</u>
Industrial	250	110,900
Domestic	12	17,200
Combined	262	128,100

Yearly Average Discharge

	<u>Gallons/Minute (gpm)</u>	<u>Gallons/Year</u>
Industrial	77	40,500,000
Domestic	12	6,307,200
Combined	89	46,807,200

Regarding the requested sewer connection, Carlsbad Energy Center LLC hereby specifically requests that the project's sewer connection be to the existing sewer line that runs through the project site and immediately east of the North County Transit District railroad tracks.

Regarding the requested potable service, Carlsbad Energy Center LLC hereby requests that the existing potable connection to the east portion of Encina Power Station that serves the tank farm area continue to be available to support existing and future fire protection needs and potable

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water needs for future CECP facilities (e.g., administrative building, warehouse/maintenance building, and domestic/personnel uses).

Regarding the requested reclaim connection, we believe that the existing reclaimed water line located at Cannon Road near Avenida Encinas, approximately 2,400 feet south of a proposed connection to the project, would serve CECP. The existing reclaimed water line will need to be extended to the project site. Carlsbad Energy Center LLC hereby requests that the City obtain any required easements for the extension of the reclaimed water line. Carlsbad Energy Center LLC will reimburse the City for the capital cost for construction of the extension of the reclaimed water line on a mutually agreeable reimbursement method.

To meet the requirements of the CEC, the "Will Serve" letter should specifically reference this letter and the project's specific requirements for reclaimed and potable water, and for wastewater discharge, so that it is clear that the City is committing supply and infrastructure to meet the project's needs as defined in this letter. Carlsbad Energy Center LLC respectfully requests receipt of the "Will Serve" letter by September 1, 2014.

Thank you for your time and consideration of this request. If you have any questions or need additional information, please contact me at (760) 710-2156 or Ahmed Haque at (760) 710-2137.

Best Regards,



George Piantka, PE
Director, Environmental
NRG Energy, West Region

cc: Gary Barberio, City of Carlsbad
Terry Smith, City of Carlsbad
Sean Beatty, NRG
Ahmed Haque, NRG
Scott Valentino, NRG