

## DOCKETED

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<b>Project Title:</b>	El Segundo Power Redevelopment Project Compliance
<b>TN #:</b>	203518
<b>Document Title:</b>	Status Report #11 ESPFM (00-AFC-14C)
<b>Description:</b>	Amendment Proceeding to Replace Utility Boiler Units 3 and 4 With New Generation Units 9, 10, 11 and 12
<b>Filer:</b>	Camile Remy-Obad
<b>Organization:</b>	California Energy Commission
<b>Submitter Role:</b>	Commission Staff
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# Memorandum

To: **Commissioner Karen Douglas** – Presiding Member  
**Commissioner Janea A. Scott** – Associate Member  
Raoul Renaud – Hearing Officer

Date : January 13, 2015  
Telephone: 916-654-3940  
File: 00-AFC-14C

From : **California Energy Commission-** Camille Remy Obad  
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Compliance Project Manager

Subject: **EL SEGUNDO ENERGY CENTER (00-AFC-14C) AMENDMENT PROCEEDING TO REPLACE UTILITY BOILER UNITS 3 AND 4 WITH NEW GENERATION UNITS 9, 10, 11 AND 12**

## STATUS REPORT 11

At the December 17, 2014 El Segundo Project Facility Modification (ESPFM) Committee Status Conference, California Energy Commission (Energy Commission) Staff and NRG Energy, Inc. (NRG or project owner) met to discuss the progress made on the ESPFM Final Staff Assessment (FSA).

As previously reported, all parties agreed that minor changes to the FSA Part A should be done and published with FSA B as one complete FSA that also includes the Units 5 & 7 conditions of certification (COCs) in order to allow for public comment and hearings on the entirety of the project at one time. The Air District stated at the Status Conference that they would send staff a draft errata to the August 28, 2014, Final Determination of Compliance (FDOC) before the errata is finalized. The Air District estimated a January 2015 completion date for the FDOC errata. Though staff have not yet received the draft errata, they remain in contact with the Air District.

In response to the Committee's prior inquiries, Energy Commission Staff are currently working with the local jurisdictional agencies to clarify when a water supply analysis (WSA) is required for an energy facility modification. Staff proposes to address this matter in the combined FSA Parts A & B.

Energy Commission Staff are also compiling the ESPFM conditions of certification (COC) compendium to be included with the FSA Parts A and B, as well as a discussion of preferred resources as project alternatives, including conservation, demand-side management and distributed generation. The California Coastal Commission's letter reaffirming its support of the facility's modifications was docketed on December 17, 2014.

Additionally, on January 13, 2015, staff docketed responses to the project owner's December 8, 2014 comments to FSA Part A. Staff's responses identify areas of agreement, and also clarify staff's position for maintaining specific language at issue in the Biological and Cultural Resources conditions of certification. Staff will also be modifying language in the Compliance, Visual Resources and Waste Management COCs based on NRG's comments. Staff believes

that there is an opportunity for NRG to provide some additional information for the purpose of CUL-6, which could allow for a more narrowly focused condition of certification.

The Committee requested at the last Status Conference that this Status Report include scheduling recommendations. Due to Air Quality technical staff not yet having a draft errata from the Air District, and to continue a dialogue with applicant on the remaining issues as identified in staff's response letter, staff requests additional time to identify for the Committee the specific remaining topics that the Committee may take a role in considering prior to the Prehearing Conference.