

DOCKETED

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**GE[™] COMMENTS TO PALMDALE ENERGY LLC[™] REVISED
PETITION FOR AMENDMENT**

Additional submitted attachment is included below.

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November 16, 2015

Subject: GE'S COMMENTS TO PALMDALE ENERGY LLC'S REVISED PETITION FOR AMENDMENT

This is in reference to Palmdale Energy LLC's Revised Petition for Amendment ("Revised Petition") for the Palmdale Energy Project (08-AFC-9C). A review of the Revised Petition has revealed a number of inaccuracies related to the General Electric ("GE") power generation equipment upon which the original permit was based. It is certainly the prerogative of the new owners to select the equipment of their choice for this project. However GE believes that statements made in the public domain concerning our products and equipment should accurately represent GE's product characteristics.

We note the following inaccurate statements:

- 1) Section 1.4, Page 1-3: states: "Replacement of the General Electric gas turbines with new Siemens SCT6-5000Fs to meet need for "Flexible Resources" to support integration of renewable energy."

The implication being the GE gas turbines are not flexible. The GE gas turbines are at least as flexible in the GE Rapid Response combined cycle plant as proposed as compared to the Siemens gas turbines.

- 2) Section 2.1, Page 2-2, Same statement as noted in item 1 and as explained above.
- 3) Page 2-8, states: "The "Flex 30" fast start plant concept offered by Siemens Energy, the supplier of the Modified Project's combustion equipment, allows for faster starting of the gas turbines by mitigating the restrictions of former HRSG designs. "

The GE Rapid Response originally proposed allows completely unrestricted starting of the gas turbines. The HRSGs provided in Rapid Response have been designed and analyzed to be suitable for daily fast start service for the life of the plant.

- 4) Section 2.5.3.2, Page 2-11, states: "Siemens "Flex 30". As noted earlier, the PEP is designed with Siemens Flex 30, which will allow the CTG to reach base load more quickly, reducing startup emissions. Since emission rates are higher during startup, than during normal steady-state operations, the Flex 30 design will facilitate the Modified Project's compliance with air emission requirements."

The GE Rapid Response plant allows the gas turbine to reach base load completely unimpeded by the combined cycle plant. The startup emissions generated by the gas turbine are thus absolutely minimized.

- 5) Section 4.1, Page 4.1-1, In explaining why higher total plant emissions with Siemens equipment should be allowed, the Revised Petition states: "These emission changes are necessary to provide the flexibility necessary to integrate renewable energy resources...". As stated previously the GE equipment originally proposed is fully capable of providing renewable energy backup.

In summary, the contention of the revised petition that the change in permit is required as Siemens equipment caters to the new project's need for flexible generation suitable for renewable backup is inaccurate. The GE Rapid Response plant proposed in the original petition is fully capable of providing this service.

Since the petition is a document in the public domain, we request that the new petition wording be corrected to eliminate the impression that GE equipment as originally proposed cannot equally accomplish what is desired for the Palmdale Energy project.

Sincerely,



Peter P. A. Stroganow