

DOCKETED

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Stephen O'Kane
Vice President

AES Alamos Energy, LLC
690 N Studebaker Road
Long Beach, CA 90803
tel 562-493-7840
Stephen.okane@aes.com
www.aes.com

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VIA ELECTRONIC DOCKETING

Keith Winstead
Project Manager
STEP Division
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

Re: Alamos Energy Center (13-AFC-01): Response to Plains West Coast Terminals LLC's Comments

Dear Mr. Winstead:

AES Alamos Energy, LLC (the "Applicant") provides the following responses to the comments submitted by Plains West Coast Terminals LLC ("Plains") on August 12, 2016.

Plains Comment: If the (Displacement Oil) DO tank basin is modified, we will need to ensure the new proposed containment has adequate storage for 110% of the tank capacity, or the tank capacity, plus a 25 year, 24-hour storm event, whichever is greater.

Response: The project design does not require the existing berms around the Displacement Oil tank basin to be disturbed or modified. Thus, no new containment will be needed.

Plains Comment: Construction activity will affect Plains West Coast Terminals storm water quality draining to Outfall 3. Recommend that AES incorporate the eastern earthen lot (that they hope to lease from Plains for construction) between our tank farm and San Gabriel River into their Construction Storm Water Permit. Please provide us with the detail BMPs they will use to protect discharges through Outfall 3.

Response: Proposed Condition of Certification SOIL&WATER-1, with which the Applicant concurs, requires preparation of a Stormwater Pollution Prevention Plan ("SWPPP") prior to site mobilization for the site, including designated construction laydown and parking areas. The SWPPP will employ Best Management Practices ("BMPs") for stormwater for the site, including the construction laydown and parking areas.



Plains Comment: Need to maintain unhindered site access to our facilities for our personnel and emergency responders during construction of AEC facility.

Response: The Applicant agrees and will ensure that Plains’ access to its facilities and the access for emergency responders will continue, consistent with approved security measures.

Plains Comment: Need to protect pipelines and equipment from excavation and/or heavy equipment loading during construction activities.

Response: The Applicant is mindful of the need to protect existing infrastructure and equipment. The project’s Engineering, Procurement, and Construction (“EPC”) contractor will incorporate existing features into the project’s construction plans and conduct its activities consistent with applicable laws, ordinances, regulations, and standards (“LORS”), including, but not limited to health, safety and environmental requirements.

Plains Comment: Need to determine if pipeline relocations are required and if so financial responsibilities for doing so.

Response: There is no need to relocate pipelines for the construction of the combined-cycled power block. One underground, 12-inch oil pipeline will need to be relocated for the construction of the simple-cycle power block. The Applicant agrees that it will bear the financial responsibility as needed, solely to facilitate the physical relocation of the pipeline, and will work with Plains on this commercial arrangement, when necessary and appropriate, prior to commencement of construction of the simple cycle units.

Plains Comment: Need to have access to pipelines for future maintenance activities.

Response: The Applicant agrees that Plains should have access to the pipelines for future maintenance activities and will work with Plains to arrange for such access consistent with site security and existing easements.

Plains Comment: Need facility security during construction activities.

Response: The Preliminary Staff Assessment proposes Condition of Certification HAZ-7, which requires the preparation of a site-specific Construction Site Security Plan for the construction phase of the project. The Construction Site Security Plan will ensure security is maintained.

Plains Comment: Laydown area agreement with AES would need to be executed.

Response: A letter of intent between AES and Plains to pursue a land lease agreement for the lot south of existing Units 5 and 6 for construction laydown purposes is in place between the two companies. Upon project approval, the letter of intent outlines the process to finalize a land lease for use of the lot by AES.



Plains Comment: Reimbursement Agreement for Plains Engineering review and Field Inspection.

Response: Cost allocations and reimbursements, if any, will be decided through the commercial negotiations between Plains and the Applicant. The Energy Commission's siting process is not the proper forum for such commercial arrangements.

Plains Comment: In the unlikely event AES wanted to use Plains' back gate, a security guard would need to be stationed at the site.

Response: The project description describes site access, and the Applicant does not have plans to add any additional access points.

Plains Comment: Plains' inspector/guard representatives' fees will need to be paid by AES.

Response: Not applicable. See response above.

Plains Comment: No hot work within 100 feet of manifolds/tanks.

Response: The Applicant's EPC contractor will comply with applicable LORS, including those associated with any hot work, and will communicate with Plains regarding construction protocols.

Plains Comment: There are currently two intake channels used to supply water to the AES facility. Plains understands, on completion of the project, AES will no longer utilize this water supply. Plains has pumping facilities within 100 feet of one channel and a pipeline that crosses the other channel. Request that both channels be refilled.

Response: The Applicant objects to this request. Plains' request to fill the channels would not advance any of the basic project objectives, would not provide any project benefits, and could result in potentially significant impacts.

Very truly yours,

A handwritten signature in black ink, appearing to read "S. O'Kane", written in a cursive style.

Stephen O'Kane
Vice-President
AES Alamitos Energy, LLC