

## DOCKETED

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December 16, 2016

Mr. Chris Perri  
Air Quality Engineer  
South Coast Air Quality Management District  
21865 Copley Drive  
Diamond Bar, CA 91765-4178

**Subject: AES Huntington Beach, LLC (Facility ID 115389)  
Additional Final Determination of Compliance Comments**

Dear Mr. Perri:

Based on our telephone conversation yesterday regarding the requirements of Huntington Beach Energy Project's (HBEP) Final Determination of Compliance (FDOC) Condition F52.1, AES Huntington Beach Energy, LLC (AES) reiterates its Preliminary Determination of Compliance (PDOC) comment<sup>1</sup> that the shutdown of the existing Huntington Beach Generating Station (HBGS) units cannot be completed without coordination with state and local regulatory agencies. Specifically, the California Public Utility Commission's (CPUC) General Order 167, Appendix E<sup>2</sup> requires AES to maintain HBGS units in a state of readiness to operate at full available power if the Control Area Operator so requests (OS 22), to notify the CPUC in writing at least 90 days prior to a change in the long-term status of a generating unit (OS 23), and to maintain said generating unit in readiness for service until after the CPUC and the Control Area Operator affirmatively declare that the generating unit is unneeded (OS 24). As such, AES **cannot** shutdown HBGS Unit 1 on a specific date without concurrence by the CPUC and the Control Area Operator (California Independent System Operator and Southern California Edison). Accordingly, AES proposes the following revision to the third paragraph of FDOC Condition F52.1:

Within 30 calendar days of actual shutdown, ~~or by no later than November 1, 2019~~, AES shall provide SCAQMD with a notarized statement that HB Beach Boiler 1 and RB Boiler 7 are permanently shutdown and that any re start or operation of the units shall require new Permits to Construct and be subject to all requirements of non-attainment new source review and the prevention of significant deterioration program.

Should you have any questions regarding the comments provided, please do not hesitate to call me at 562-493-7840. We appreciate your attention to these comments.

Sincerely,

Stephen O'Kane  
Manager  
AES Huntington Beach Energy, LLC

cc: Melissa Foster/Stoel Rives  
Jerry Salamy/CH2M

<sup>1</sup> HBEP PDOC Comment Letter dated July 11, 2016, Page 1, Draft Permit Condition Comments, 3<sup>rd</sup> paragraph.

<sup>2</sup> [http://docs.cpuc.ca.gov/PUBLISHED/GENERAL\\_ORDER/108114.htm](http://docs.cpuc.ca.gov/PUBLISHED/GENERAL_ORDER/108114.htm)