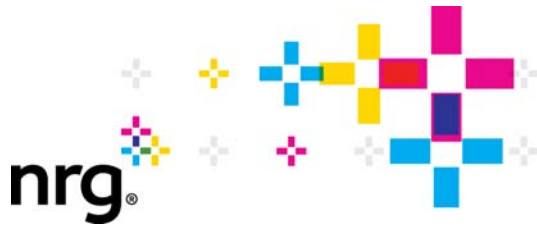


## DOCKETED

<b>Docket Number:</b>	15-AFC-01
<b>Project Title:</b>	Puente Power Project
<b>TN #:</b>	215567
<b>Document Title:</b>	Comment on Final Determination of Compliance for the Proposed Puente Power Project (15-AFC-01/VCAPCD Appl.No. 00013-370)
<b>Description:</b>	N/A
<b>Filer:</b>	Robert L. Dickson, Jr.
<b>Organization:</b>	Latham & Watkins LLP
<b>Submitter Role:</b>	Applicant Representative
<b>Submission Date:</b>	1/25/2017 2:02:23 PM
<b>Docketed Date:</b>	1/25/2017



**NRG Oxnard Energy Center, LLC**  
5790 Fleet Street, Suite 200  
Carlsbad, CA 92008  
Phone: 760-710-2156  
Fax: 760-710-2158

January 25, 2017

Kerby E. Zozula  
Manager, Engineering Division  
Ventura County Air Pollution Control District  
669 County Square Drive, 2nd Floor  
Ventura, CA 93003

Subject: Comment on Final Determination of Compliance for the Proposed Puente Power Project (15-AFC-01/VCAPCD Application No. 00013-370)

Dear Mr. Zozula:

On January 13, 2017 NRG Oxnard Energy Center, LLC (Applicant) submitted comments on several Conditions of Certification (CoCs) contained in the California Energy Commission ("CEC") Staff's Final Staff Assessment (FSA) for the Puente Power Project ("P3" or "Project"). One of these conditions is FSA Condition AQ-48 which reflects the requirements of the Ventura County Air Pollution Control District (VCAPCD) Final Determination of Compliance (FDOC) Condition 48. For consistency purposes, below the Applicant is making this same requested change to FDOC Condition 48.

FDOC Condition 48 includes limits on the proposed new Combustion Turbine Generator (CTG) hours of operation per year and the number of startups/shutdowns per year. While the limit on the number of startups/shutdowns per year matches the worst-case assumptions in the Authority to Construct (ATC)/Determination of Compliance (DOC) application package, it does not account for the startups/shutdowns that will occur during the CTG commissioning period. The detailed emission calculations in the ATC/DOC application package show that the 200 startups/200 shutdowns occur following the end of the CTG commissioning period. The ATC/DOC permit application includes a separate set of operating assumptions/emission estimates for the CTG commissioning period. Based on these operating assumptions/emission estimates, the FDOC includes separate conditions limiting the maximum hourly emissions and overall emissions, and limiting the CTG to 366 operating hours during the commissioning period (FDOC Condition 30). Therefore, the Applicant requests a change to Condition 48 to clarify that the limit of 200 startups/shutdowns per year begins following the end of the commissioning period.

The Applicant is also requesting a change to Condition 48 to clarify how aborted startups are counted for purposes of the 200 startup per year limit. The ATC/DOC application package and FDOC analyzed the emissions associated with an aborted

CTG startup (startup/shutdown/restart). We are requesting that Condition 48 be revised to count an aborted startup (startup/shutdown/restart) as a single startup event provided that the total duration of the event does not exceed the 60-minute startup exception period allowed in FDOC Condition 22 and the hourly emissions during the event do not exceed the startup emission limits in FDOC Condition 27.

Finally, the Applicant is proposing to clarify the definition of a startup for the purposes of this condition.

The Applicant requests that Condition 48 be changed as shown below (changes shown in strikethrough/underline format).

- 48.** The number of annual operating hours (including startup and shutdown) for the CTG shall not exceed 2,150 hours per year. The number of startup periods occurring shall not exceed 200 per year (following the end of the commissioning period). The number of shutdown periods occurring shall not exceed 200 per year (following the end of the commissioning period). For the purposes of this condition, the beginning of the startup occurs at turbine initial firing and the end of the startup occurs at the start of the first 15-minute average period when both the 2.5 ppm @ 15% O<sub>2</sub> NO<sub>x</sub> and the 4 ppm @ 15% O<sub>2</sub> CO normal operation BACT levels in Condition 29 are achieved. If during the startup the process is aborted and the turbine is restarted, then the startup and restart will count as one startup, provided the total time for the startup/restart does not exceed the 60-minute exception allowed in Condition 22 and the hourly emissions during the event do not exceed the startup emission limits in Condition 27...

We greatly appreciate the effort that the VCAPCD and San Joaquin Valley Air Pollution Control District staffs have expended in evaluating the permit application and preparing the FDOC for this Project.

If you have any questions or comments, please do not hesitate to contact me at (760) 710-2156.

Sincerely,



George L. Piantka, PE  
Sr. Director, Regulatory Environmental Services  
NRG Energy, Inc.

cc: Shawn Pittard, CEC Project Manager  
Leland Villalvazo, SJVAPCD