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BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT COMMISSION OF THE STATE OF CALIFORNIA 1516 Ninth Street, Sacramento, CA 95814 1-800-822-6228 – <u>www.energy.ca.gov</u>

APPLICATION FOR CERFITICATION FOR THE:

Docket No. 13-AFC-01

ALAMITOS ENERGY CENTER

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<u>Staff's response to the applicant's proposed changes to the language of</u> <u>SOIL&WATER-6 and -7.</u>

The applicant incorrectly stated there are no Laws, Ordinances, Regulations or Standards (LORS) requiring metering of the different water uses on the project site separately. As set forth in the LORS table on page 4.9-5 in part one of the Final Staff Assessment, the requirement to track operational water use from sanitary and landscaping use was to satisfy the requirements of Title 20, Section 1304. This data collection provision is part of the Commission's Quarterly Fuel and Energy Reporting (QFER) program. As described in Schedule 3A(1) and 3(A)2 of the CEC-1304 QFER form, water use is to be broken down by the following categories: sanitation, landscaping, dust suppression, inlet-air cooling, intercooling, steam-cycle cooling, generator bearings, and other uses. Information is to be provided on monthly and annual basis.

While the QFER reports recognize that not all facilities have detailed metering data and does allow estimates of water use in those cases, staff's proposed conditions requiring at least the metering of sanitary uses, will contribute to the applicant's ability to comply with the section 1304 QFER requirements.

As the applicant has noted in its supplemental comments on the PMPD submitted on March 15, the applicant retracted the statement that there would be no landscaping on the project site. Since landscaping is included and it is a specific category under the QFER reporting, staff concludes it is important to ensure all water uses at the project can be measured. Staff understands there are other methods for reliably estimating water use without specifically metering each use. Staff proposes to revise the condition to provide the applicant flexibility such that they can provide the volumes required for QFER reporting.

Staff provides the following language for Conditions of Certification **SOIL & WATER** – **6 and -7.** as shown below. Staff has also revised the condition to move language that belongs in the verification.

SOIL&WATER-6: Water supply for project construction, sanitary, <u>landscaping</u>, and industrial uses during project construction and operation shall be potable water supplied by the city of Long Beach Water Department (LBWD). Water use for project operation, including 1.6 AFY for sanitary <u>and landscaping</u> purposes, shall not exceed 130 AFY. Water use for construction shall not exceed 22 AFY during the 56-month demolition and construction period. A monthly summary of water use shall be submitted to the CPM. No later than 60 days prior to construction, the project owner shall submit to the CPM two copies of the executed agreement for the supply and onsite use of potable water from LBWD.

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<u>Verification:</u> <u>No later than 60 days prior to construction, the project owner shall</u> <u>submit to the CPM two copies of the executed agreement for the supply and onsite</u> <u>use of potable water from LBWD.</u>

The project owner shall submit a water use summary report to the CPM monthly during construction and annually during operations for the life of the project. The annual report shall include calculated monthly range, monthly average, daily maximum within each month and annual use by the project in both gallons per minute and acre-feet. After the first year and for subsequent years, this information shall also include the yearly range and yearly average potable water used by the project.

WATER METERING

SOIL&WATER-7: Prior to the use of potable water, the project owner shall install and maintain metering devices as part of the water supply and distribution system. The project shall monitor and record in gallons per day the total volume of potable water from LBWD. Those metering devices shall be operational for the life of the project and must be <u>configured</u> to <u>reliably</u> <u>estimate</u> the volume of construction, domestic <u>(including landscaping)</u>, and process water use separately.

<u>Verification:</u> At least 30 days prior to use of water for project construction and operation, the project owner shall submit to the CPM evidence that metering devices have been installed and are operational. The project owner shall provide a report on the servicing, testing, and calibration of the metering devices in the annual compliance report.

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