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Docket Number:	13-AFC-01
Project Title:	Alamitos Energy Center
TN #:	216967
Document Title:	Alamitos Energy Center - Comments on Errata
Description:	N/A
Filer:	Deric Wittenborn
Organization:	Ellison Schneider Harris & Donlan LLP
Submitter Role:	Applicant
Submission Date:	4/11/2017 3:31:03 PM
Docketed Date:	4/11/2017

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April 11, 2017

Commissioner Karen Douglas
Commissioner Janea Scott
Hearing Officer Ken Celli
California Energy Commission
1516 Ninth Street
Sacramento, California 95814-5512

RE: Alamitos Energy Center (13-AFC-01): Comments on Errata

Dear Commissioners Douglas, Commissioner Scott and Hearing Officer Celli:

On behalf of AES Alamitos Energy, LLC (the “Applicant”), we offer the following comments on the Errata (TN#: 216938). These comments were previously submitted by the Applicant, but not incorporated into the Errata.¹

Project Description: Page 2-8, paragraph 2, first sentence “Construction of the AEC facility, from site preparation and grading to commercial operation, is expected to take place over an approximate 57-month period, from the second quarter of 2017 to the third quarter of 2021” should be revised. The construction period is described as 56 months (pages 2-2, 7.1-18, 7.1-20, 7.2-3, 6.6-2, 8.2-11, 8.4-3, and 8.4-21) and as 57 months (pages 2-8, 2-22, 6.1-4, 6.1-15, 6.2-12, 6.3-7, 8.3-6, 8.3-7, and 8.3-12). As described in the Applicant’s Opening Testimony (TN# 214099), “Construction activities at the AEC site are anticipated to last 57 consecutive months” (56 actual months of construction).

Page 2-22, Finding of Fact number 1 needs to be revised to correctly identify the project owner.

~~AES Alamitos Energy~~ Alamitos Energy, Limited Liability Corporation (LLC) will own and operate the Alamitos Energy Center on private land in the City of Long Beach, Los Angeles County, California.

¹ See TN# 216219 (Applicant’s comments before the PMPD Conference); TN# 216411 (Applicant’s suggested edits to Greenhouse Gas Table 3), and TN #216564 (Applicant’s comments after the PMPD Conference).

Air Quality and Greenhouse Gas Tables: The proposed changes to Table 6.11, LORS Table on page 6.1-11 set forth in the Errata should also be made to Greenhouse Gas Table 3. (See Filing TN # 216441, AES's Suggested Edits to AEC PMPD Greenhouse Gas Table 3.)

Conditions of Certification: Appendix A

Appendix A, Page 24, COC SOIL&WATER-6, Verification, last sentence: The project site is already supplied with water from the Long Beach Water District and water use during construction will not be significant. As such, please revise the last sentence of Condition SOIL&WATER-6 as follows.

No later than 60 days prior to **commissioning either power block** 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.

Appendix A, Page 29, COC CUL-1: CUL-1 contains a capitalized term, "Cultural Resources Ground Disturbance", that which is not defined in either the PMPD, the condition of certification, or verification language. Replace "Cultural Resources Ground Disturbance" with "ground disturbance".


Appendix A, Page 32, COC CUL-3: Correct typographical error in the numbering of the elements and measures on page 32.

Appendix A, Page 41, COC CUL-7: Replace "iscovery" with "discovery".

Appendix A, Page 188, COC VIS-3: The word "Verification" as follows: "**Verification**: The landscaping plan shall be submitted to the CPM for review and approval and simultaneously to the city of Long Beach for review and comment at least 90 days prior to installation. * * *"

Thank you for your attention to these matters.

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