DOCKETED	
Docket Number:	89-AFC-01C
Project Title:	Compliance - LUZ SEGS IX and X Projects Application for Certification
TN #:	236835
Document Title:	88-AFC-1 PWS 2 & 89-AFC-1 PWS 2 - SEGS VIII & IX 2020 CEC Annual Report
Description:	N/A
Filer:	Neal Davies
Organization:	Terra-Gen Operating Compnay
Submitter Role:	Applicant
Submission Date:	2/18/2021 12:08:53 PM
Docketed Date:	2/18/2021



February 18, 2021

John Heiser Compliance Project Manager California Energy Commission 1516 Ninth Street, MS-2000 Sacramento, CA 95814-5512

Subject: 88-AFC-1 PWS 2 & 89-AFC-1 PWS 2 SEGS VIII and SEGS IX 2020 Annual Compliance Report

Dear Mr. Heiser:

Enclosed is the Annual Compliance Report for the SEGS VIII and SEGS IX facilities at Harper Lake. The report includes compliance activities for the period of January 1, 2020 through December 31, 2020, per the revised Annual Reporting Requirements.

If you have any questions, or need additional information, please contact Neal Davies at (760) 762-3100, ext. 225.

Sincerely,

Robert Fimbres Site Manager

LUZ Solar Partners

VIII & IX

2020 ANNUAL COMPLIANCE REPORT SEGS VIII & IX

SUBMITTED TO

CALIFORNIA ENERGY COMMISSION SACRAMENTO, CALIFORNIA

PREPARED BY

TERRA-GEN OPERATING COMPANY

FOR

LUZ SOLAR PARTNERS VIII & IX
HARPER LAKE, CALIFORNIA

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SEGS VIII & SEGS IX Statement of Compliance

To the best of our knowledge and understanding, SEGS VIII and SEGS IX are in compliance with the Conditions of Certification related to air quality, except for those Conditions identified elsewhere in this report.

Robert Fimbres

Site Manager

LUZ Solar Partners

SEGS VIII & IX

Mojave Desert Air Quality Management District Correspondence

2020 MDAQMD Correspondence Summary

Date	Subject
January	2019 Fourth Quarter Emissions Monitoring Report
February	Operating Permit Fees
February	Title V Permit Fees
April	2020 First Quarter Emissions Monitoring Report
July	2020 Second Quarter Emissions Monitoring Report
August	2020 RATA and Compliance Test Protocol Plan and Report
October	2020 Third Quarter Emissions Monitoring Report

Mojave Desert Air Quality Management District HTF Heater Permit to Operate

2020 SEGS VIII & SEGS IX Permit to Operate



MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT

14306 Park Avenue, Victorville, CA 92392-2310 760.245.1661 -- 800.635.4617 -- FAX 760.245.2022

PERMIT TO OPERATE

B002013

Operation under this permit must be conducted in compliance with all information included with the initial application, initial permit condition, and conditions contained herein. The equipment must be maintained and kept in good operating condition at all times. This Permit to Operate or copy must be posted on or within 8 meters of equipment. If a copy is posted, the original must be maintained on site, available for inspection at all times.

EXPIRES LAST DAY OF: MARCH 2021

OWNER OR OPERATOR (Co. #603)

Luz Solar Partners LTD., VIII 437 Madison Avenue 22nd Floor, Suite A New York, NY 10022

EQUIPMENT LOCATION (Fac. #975)

Harper Lake SEGS VIII 43880 Harper Lake Road Hinkley, CA 92347

Description:

HEATER, SEGS VIII HTF consisting of: A Kinetics Technology Inc. natural gas-fired heater with a maximum design heat input of 872 MMBTU/hr and including the following equipment (motors are added to the rating assuming 2550 Btu per horsepower):

EQUIPMENT

Capacity	Equipment Description					
872	radient burners					
2.04	Blowers, Forced Draft - Two (B-235 @ 300 hp & 1190 rpm; B-255 @ 500 hp @ 1200 rpm)					
2.04	Fans, Induced Draft - Two (B-236 @ 300 hp & 885 rpm; B-256 @ 500 hp & 1190 rpm)					
22.9	Pumps, HTF Var Freq - Three (P-300, P-310 & P-300) 3,000 hp each @ 1794 rpm					
0.3 Pump, Freeze Protection - One (P-365) 100 hp @ 1775 rpm						

CONDITIONS:

1. The maximum hourly and daily emission limits (Reference letter from WZI, Inc. dated May 2, 1994, subject "Proposed Emission Limits for SEGS VIII and SEGS IX Heaters") for the following criteria pollutants are:

NOx - 81.2 lb/h (which is based on a ppmv of 67) but is not exceed 580 lbs in any one day. CO - 248 lb/h (which is based on a ppmv of 350) but is not to exceed 550 lbs in any one day. PM10 - 5.2 lb/h but not to exceed 83.2 lb in any one day.

Fee Schedule: 2 (f)

Rating: 899280000 Btu

SIC: 4911

SCC: 10100601

Location/UTM(Km): 469E/3876N

This permit does not authorize the emission of air contaminants in excess of those allowed by law, including Division 26 of the Health and Safety Code of the State of California and the Rules and Regulations of the District. This permit cannot be construed as permission to violate existing laws, ordinances, statutes or regulations of this or other governmental agencies. This permit must be renewed by the expiration date above. If billing for renewal fee required by Rule 301(c) is not received by expiration date above, please contact the District.

Luz Solar Partners LTD., VIII 43880 Harper Lake Road Hinkley, CA 92347

Brad Poiriez

Air Pollution Control Officer

Page 1 of 2

- a) The average hourly emission for Nox and CO shall be reported per the approved monitoring plan. The average hourly rate shall be the arithmetic average of four or more data points equally spaced over each 1-hour period.
- b) Daily emissions shall be reported based on the hourly emissions reported above.
- c) All PM emissions from these heaters shall be assumed to be 100% PM10.
- 2. The total annual emissions for Nox and CO when calculated on a rolling annual average shall not exceed the following:

NOx - 27.9 tons/year CO - 26.5 tons/year

Compliance with this emission limit shall be determined by using CEMS data and calculating an arithmetic average of the previous 365 days (Day is defined as any 24-hour period beginning at midnight).

- 3. The daily emissions of NOx and CO and as well as O2 (a diluent gas) shall be monitored using a Continuous Emissions Monitoring System (CEMS) which shall be operating at all times in accordance with the District approval monitoring plan.
- 4. The following are the acceptability testing requiremtns for the CEMS:
- a) For NOx CEMS Performance Specifications 2 of 40 CFR 60 Appendix B.
- b) For O2 CEMS Performance Specification 3 of 40 CFR 60 Appendix B.
- c) For CO CEMS Performance Specification 4 of 40 CFR Appendix B.
- 5. The following compliance tests are required and the emission limit given above shall not be exceeded:
- a) At least once every twelve (12) months: a compliance test for NOx (as NO2 in ppmv at 3% O2 & dry);
- b) At least once every twelve (12) months: a compliance test for CO (in ppmv at 3% O2& dry);
- c) At least once every sixty (60) months: a compliance test to verify PM10 emissions rate, commencing in 1997. However, PM10 emission compliance testing may be required at the discretion of the District.

The owner/operator must submit a compliance/certification test protocol at least thirty (30) days prior to the compliance/certification test date. The owner/operator must conduct all required compliance/certification tests in accordance with a District-approved test protocol. The owner/operator must notify the District a minimum of ten (10) days prior to the compliance/certification test date so that an observer may be present. The final compliance/certification test results must be submitted to the District within forty-five (45) days of completion of the test. All compliance/certification test notifications, protocols, and results may be submitted electronically to reporting@mdaqmd.ca.gov

- 6. Daily logs shall be maintained which include, but is not limited to, the following:
- a) Hours of operation/day;
- b) Dates of routine maintenance;
- c) Dates of major repairs and/or replacements;
- d) Natural gas use; and,
- e) Amount of HTF added to system.
- 7. Quarterly reports shall be provided to the District Compliance Supervisor in accordance with the District approved monitoring plan. All quarterly reports shall be postmarked by the 30th day following the end of each calendar quarter.

Page 2 of 2 Permit: B002013 Issue Date: 03/17/2020



MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT

14306 Park Avenue, Victorville, CA 92392-2310 760.245.1661 -- 800.635.4617 -- FAX 760.245.2022

PERMIT TO OPERATE

B002016

Operation under this permit must be conducted in compliance with all information included with the initial application, initial permit condition, and conditions contained herein. The equipment must be maintained and kept in good operating condition at all times. This Permit to Operate or copy must be posted on or within 8 meters of equipment. If a copy is posted, the original must be maintained on site, available for inspection at all times.

EXPIRES LAST DAY OF: MARCH 2021

OWNER OR OPERATOR (Co. #2427)

Luz Solar Partners LTD., IX 437 Madison Avenue, 22nd Floor, Suite A New York, NY 10022

EQUIPMENT LOCATION (Fac. #3819)

Harper Lake SEGS IX 43880 Harper Lake Road Hinkley, CA 92347

Description:

HEATER, SEGS IX HTF consisting of: A Kinetics Technology Inc., natural gas-fired heater with a maximum design heat input of 872 MMBtu/hr and including the following equipment (motors are added to the rating assuming 2550 Btu per horsepower):

EQUIPMENT

Capacity	Equipment Description					
872	Heaters, Vertical Tube Box - Four (H-200, H-210, H-220 & H230) each with 32 Alzeta Pyrocore radiant burners					
1.53	Blowers, Forced Draft - Two (B-235 & B-255) 300 bhp ea. @ 1190 rpm					
1.53	Fans, Induced Draft - Two (B-236 & B256) 300 bhp ea. @885 rpm					
22.95	Pumps, HTF Var. Freq - Three (P-300, P310 & P-300) 3,000 bhp ea @ 1794 rpm					
0.3	Pumps, Freeze Protection - One (P-365) 100 bhp @ 1775 rpm					

CONDITIONS:

1. The maximum hourly and daily emission limits (Reference letter from WZI, Inc. dated May 2, 1994, subject "Proposed Emission Limits for SEGS VIII and SEGS IX Heaters") for the following criteria pollutants are:

Nox - 81.2 lb/h (which is based on a ppmv of 67) but is not exceed 580 lb in any one day. CO - 248 lb/h (which is based on a ppmv of 350) but is not to exceed 550 lb in any one day. PM10 - 5.2 lb/h but not to exceed 83.2 lb in any one day.

Fee Schedule: 2 (f)

Rating: 898310000 Btu

SIC: 4911

SCC: 10100601

Location/UTM(Km): 469E/3876N

This permit does not authorize the emission of air contaminants in excess of those allowed by law, including Division 26 of the Health and Safety Code of the State of California and the Rules and Regulations of the District. This permit cannot be construed as permission to violate existing laws, ordinances, statutes or regulations of this or other governmental agencies. This permit must be renewed by the expiration date above. If billing for renewal fee required by Rule 301(c) is not received by expiration date above, please contact the District.

Luz Solar Partners LTD., IX 43880 Harper Lake Road Hinkley, CA 92347

Brad Poiriez

Air Pollution Control Officer

Permit: B002016 Iss

Page 1 of 2

Issue Date: 03/17/2020

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- b) Daily emissions shall be reported based on the hourly emissions reported above.
- c) All PM emissions from these heaters shall be assumed to be 100% PM10.
- 2. The total annual emissions for Nox and CO when calculated on a rolling annual average shall not exceed the following:

NOx - 27.9 tons/year CO - 26.5 tons/year

Compliance with this emission limit shall be determined by using CEMS data and calculating an arithmetic average of the previous 365 days (Day is defined as any 24-hour period beginning at midnight).

- 3. The daily emissions of NOx and CO and as well as O2 (a diluent gas) shall be monitored using a Continuous Emissions Monitoring System (CEMS) which shall be operating at all times in accordance with the District approval monitoring plan.
- 4. The following are the acceptability testing requiremtns for the CEMS:
- a) For NOx CEMS Performance Specifications 2 of 40 CFR 60 Appendix B.
- b) For O2 CEMS Performance Specification 3 of 40 CFR 60 Appendix B.
- c) For CO CEMS Performance Specification 4 of 40 CFR Appendix B.
- 5. The following compliance tests are required and the emission limit given above shall not be exceeded:
- a) At least once every twelve (12) months: a compliance test for NOx (as NO2 in ppmv at 3% O2 & dry);
- b) At least once every twelve (12) months: a compliance test for CO (in ppmv at 3% O2& dry);
- c) At least once every sixty (60) months: a compliance test to verify PM10 emissions rate, commencing in 1997. However, PM10 emission compliance testing may be required at the discretion of the District.

The owner/operator must submit a compliance/certification test protocol at least thirty (30) days prior to the compliance/certification test date. The owner/operator must conduct all required compliance/certification tests in accordance with a District-approved test protocol. The owner/operator must notify the District a minimum of ten (10) days prior to the compliance/certification test date so that an observer may be present. The final compliance/certification test results must be submitted to the District within forty-five (45) days of completion of the test. All compliance/certification test notifications, protocols, and results may be submitted electronically to reporting@mdaqmd.ca.gov

- 6. Daily logs shall be maintained which included, but is not limited to, the following:
- a) Hours of operation/day
- b) Dates of routine maintenance
- c) Dates of major repairs and/or replacements
- d) Natural gas use
- e) Amount of HTF added to system
- 7. Quarterly reports shall be provided to the District Compliance Supervisor in accordance with the District approved monitoring plan. All quarterly reports shall be postmarked by the 30th day following the end of each calendar quarter.

Page 2 of 2 Permit: B002016 Issue Date: 03/17/2020

Dust Suppressant Application Verification

2020 Dust Suppressant Application

During the month of February 2020, Magnesium Chloride was applied to 15.5 miles of off-site dirt roads for annual PM10 mitigation. SEGS VIII was invoiced for 1.5 miles of road application. SEGS IX was invoiced for 14.0 miles of application.

SOUTH WESTERN SEALCOATING, INC.

Contractors Lic. No. #678645 23644 Adams Avenue Murrieta, Callfornia 92562

BILL OF LADING 12861

(951) 677-6228

SOLD TO:	Terra	Gen	Cuz Solar
	lerra	Gen	co 2 migr

· SHIPTO: Hinkley C.D. Santale

Victorull	RRIER: SWS	De. Time: <u>6200</u> Am — Del. Date: <u>2/27/</u> 2020
ORIGIN NO. Murrieta	DELEAGENO	CARRIER BL.
	CONTRACT APPLICATION OF MAGNESIUM CHLORIDE	
METER READING U.S. GAL.		
EndGAL.		Weight Ticket #
START GAL.	Truck Lic	GROSS LBS
TOTALGAL.	Trailer Lic(008	TARE LBS.
Loaded By	Rec. By	NET LBS. ————————————————————————————————————

SOUTH WESTERN SEALCOATING, INC.

Thank You

Conditions of Certification – Air Quality Compliance

SEGS VIII & IX Conditions of Certification Air Quality Compliance

To the best of our knowledge and understanding as attested to previously in this report, SEGS VIII and SEGS IX are in compliance with the Conditions of Certification relative to air quality with the following exceptions:

SEGS VIII

Condition 1-1

Information and records are not available pertaining to the submission of the required copies of bid specifications, installation schedules and purchase orders that were required for the low NOx burner installation at the SEGS III, IV, and V facilities.

SEGS IX

Condition 1 - 3 (b)

Routine source testing has been performed on the modified internal combustion engine and a copy submitted to the Mojave Desert Air Quality Management District.

Condition 1 - 39

Excess emissions cannot be calculated per 40 CFR 60.7 and 60.13 since heater operation does not satisfy the definition of a "boiler operating day" as contained in 40 CFR 60.41a. NOx emissions are being calculated on a 30-day rolling average.

Title V Permit

The Title V Permit was issued by the Mojave Desert Air Quality Management District on October 26, 2016 and is set to expire on October 26, 2021. An application for permit renewal will be submitted in the 2nd quarter of 2021.

Emission Testing – Newberry Springs

Emission Test Report for Southern California Gas Newberry Springs Compressor Station Compressor Number 7 is available for review at:

Mojave Desert Air Quality Management 14306 Park Avenue Victorville, CA 92392-2310 760-762-1661

Waste Contractors List and Agreements

Luz Solar Partners VIII & IX have entered into contracts with the following listed transporters to provide transportation and disposal services for various hazardous and non-hazardous wastes. Luz Solar Partners VIII & IX does not directly contract with any hazardous waste disposal facilities.

Luz Solar Partners VIII & IX utilizes the San Bernardino County franchise trash collection service for all ordinary trash collection and disposal. As such there is no contract in place for this service and there is no accounting available as to the quantity shipped to the Barstow landfill.

Transportation companies with contracts in 2020:

Burrtec Waste Industries Non-hazardous wastes
MP Environmental Services Hazardous wastes
Nursery Products Services Non-hazardous wastes
Asbury Environmental Services Hazardous wastes

Desert Environmental Services Hazardous / Non-hazardous Waste

Clean Harbors Hazardous wastes

All hazardous waste transporters listed above have active valid EPA identification numbers as well as current valid registration with the California Department of Toxic Substances Control (DTSC). Information regarding these permits is available on the DTSC website.

2020 Non-Hazardous Waste Summary

	<u>Disposal Method ar</u>							
Waste Type	Quantity (Tons)		<u>Facility</u>					
Clarifier Sludge Cake	18.16	Recycle	Helendale, CA					
Clarifier Sludge Cake	19.16	Recycle	Helendale, CA					
Clarifier Sludge Cake	18.83	Recycle	Helendale, CA					
Clarifier Sludge Cake	17.87	Recycle	Helendale, CA					
Clarifier Sludge Cake	17.85	Recycle	Helendale, CA					
Clarifier Sludge Cake	18.74	Recycle	Helendale, CA					
Clarifier Sludge Cake	17.74	Recycle	Helendale, CA					
Clarifier Sludge Cake	16.92	Recycle	Helendale, CA					
Clarifier Sludge Cake	15.21	Recycle	Helendale, CA					
Clarifier Sludge Cake	15.19	Recycle	Helendale, CA					
Clarifier Sludge Cake	16.27	Recycle	Helendale, CA					
Clarifier Sludge Cake	15.89	Recycle	Helendale, CA					
Clarifier Sludge Cake	12.32	Recycle	Helendale, CA					
Clarifier Sludge Cake	21.93	Recycle	Helendale, CA					
Clarifier Sludge Cake	24.96	Recycle	Helendale, CA					
Clarifier Sludge Cake	19.8	Recycle	Helendale, CA					
Clarifier Sludge Cake	20.89	Recycle	Helendale, CA					
Clarifier Sludge Cake	10.03	Recycle	Helendale, CA					
Clarifier Sludge Cake	12.03	Recycle	Helendale, CA					
Clarifier Sludge Cake	12.65	Recycle	Helendale, CA					
Clarifier Sludge Cake	11.08	Recycle	Helendale, CA					
Clarifier Sludge Cake	11.86	Recycle	Helendale, CA					
Clarifier Sludge Cake	11.3	Recycle	Helendale, CA					
Clarifier Sludge Cake	15.59	Recycle	Helendale, CA					
Clarifier Sludge Cake	14.23	Recycle	Helendale, CA					
Clarifier Sludge Cake	12.08	Recycle	Helendale, CA					
Clarifier Sludge Cake	25.68	Recycle	Helendale, CA					
Clarifier Sludge Cake	24.33	Recycle	Helendale, CA					
Clarifier Sludge Cake	26.27	Recycle	Helendale, CA					
Clarifier Sludge Cake	6.54	Recycle	Helendale, CA					
Clarifier Sludge Cake	6.67	Recycle	Helendale, CA					
Clarifier Sludge Cake	11.79	Recycle	Helendale, CA					
Clarifier Sludge Cake	11.21	Recycle	Helendale, CA					
Clarifier Sludge Cake	15.83	Recycle	Helendale, CA					
Clarifier Sludge Cake	13.73	Recycle	Helendale, CA					
Clarifier Sludge Cake	13.82	Recycle	Helendale, CA					
Clarifier Sludge Cake	14.51	Recycle	Helendale, CA					

2020 Non-Hazardous Waste Summary (continued)

Clarifier Sludge Cake	10.79	Recycle	Helendale, CA
Clarifier Sludge Cake	10.6	Recycle	Helendale, CA
Clarifier Sludge Cake	12.22	Recycle	Helendale, CA
Clarifier Sludge Cake	7.99	Recycle	Helendale, CA
Clarifier Sludge Cake	7.28	Recycle	Helendale, CA
Clarifier Sludge Cake	13.41	Recycle	Helendale, CA
Clarifier Sludge Cake	7.24	Recycle	Helendale, CA
Clarifier Sludge Cake	8.86	Recycle	Helendale, CA
Clarifier Sludge Cake	8.55	Recycle	Helendale, CA
Clarifier Sludge Cake	8.68	Recycle	Helendale, CA
Clarifier Sludge Cake	6.36	Recycle	Helendale, CA
Clarifier Sludge Cake	12.29	Recycle	Helendale, CA
Clarifier Sludge Cake	5.78	Recycle	Helendale, CA
Clarifier Sludge Cake	12.52	Recycle	Helendale, CA
Clarifier Sludge Cake	11.43	Recycle	Helendale, CA
Clarifier Sludge Cake	11.16	Recycle	Helendale, CA
Clarifier Sludge Cake	11.77	Recycle	Helendale, CA
Clarifier Sludge Cake	11.68	Recycle	Helendale, CA
Clarifier Sludge Cake	10.72	Recycle	Helendale, CA
Clarifier Sludge Cake	11.15	Recycle	Helendale, CA
Clarifier Sludge Cake	11.11	Recycle	Helendale, CA
Clarifier Sludge Cake	9.43	Recycle	Helendale, CA
Clarifier Sludge Cake	11.92	Recycle	Helendale, CA
Clarifier Sludge Cake	10.59	Recycle	Helendale, CA
Clarifier Sludge Cake	10.7	Recycle	Helendale, CA
Clarifier Sludge Cake	12.35	Recycle	Helendale, CA
Clarifier Sludge Cake	7.19	Recycle	Helendale, CA
Clarifier Sludge Cake	7.06	Recycle	Helendale, CA
Clarifier Sludge Cake	7.23	Recycle	Helendale, CA
Clarifier Sludge Cake	8.25	Recycle	Helendale, CA
Clarifier Sludge Cake	7.4	Recycle	Helendale, CA
Clarifier Sludge Cake	8.38	Recycle	Helendale, CA
Clarifier Sludge Cake	10.01	Recycle	Helendale, CA
Clarifier Sludge Cake	9.22	Recycle	Helendale, CA
Clarifier Sludge Cake	8.2	Recycle	Helendale, CA
Clarifier Sludge Cake	7.32	Recycle	Helendale, CA
Clarifier Sludge Cake	9.84	Recycle	Helendale, CA
Clarifier Sludge Cake	8.98	Recycle	Helendale, CA
Clarifier Sludge Cake	9.5	Recycle	Helendale, CA
Clarifier Sludge Cake	8.5	Recycle	Helendale, CA

2020 ANNUAL COMPLIANCE REPORT

SEGS VIII & IX

2020 Hazardous Waste Summary

Waste Type	Quantity (Tons)	Disposal Method	<u>Facility</u>
Cooling Tower Waste Liquid	12.63	Landfill	Wellton, AZ
Oil Contaminated Debris	0.81	Landfill	Buttonwillow, CA
Mirror Glass Contaminated With Lead	10.69	Landfill	Beatty, NV
Oily Water with HTF	17.387	Recycle	Compton, CA
Oil Contaminated Debris	0.72	Landfill	Buttonwillow, CA
Mirror Glass Contaminated With Lead	9.95	Landfill	Beatty, NV
Used Oil	0.05	Recycle	Fontana, CA
Oily Water with HTF	17.647	Recycle	Compton, CA
Oil Contaminated Debris	0.09	Landfill	Buttonwillow, CA

2020 ANNUAL COMPLIANCE REPORT

SEGS VIII & IX

Hazardous Waste Storage

Under Conditions of Certification WASTE-4 (VIII) and WASTE-5 (IX) Luz Solar Partners VIII & IX shall not store hazardous waste on site for more than 90 days unless they obtain an extension from California Department of Health Services (CDHS) or a permit as a storage facility. Jurisdiction over hazardous waste management no longer resides with the CDHS. The California Department of Toxic Substances Control (DTSC) is the state agency that now has jurisdiction in these matters and the agency empowered with the enforcement of the regulations is the San Bernardino County Fire Department, Hazardous Materials Division acting as the CUPA for San Bernardino County. Luz Solar Partners VIII & IX follows all applicable regulations regarding the storage of hazardous materials on site. No hazardous materials are stored on site for longer than 90 days unless allowed by LORS and Luz Solar Partners VIII & IX did not apply for a variance to hazardous waste regulations or applied for a permit as a storage facility during the 2020 calendar year.

2020 ANNUAL COMPLIANCE REPORT II. BIOLOGICAL RESOURCES / WASTE MANAGEMENT

SEGS VIII & IX

2020 Heat Transfer Fluid Waste Manifests

LINT PAIS282

UNIFORM HAZARDOUS		rgency Response 458-3036	Phone	4. Manifest	Tracking No	Approved.		100
5. Generator's Name and Mailing Address LUZ SOLAR PARTNERS 43880 HARPER LAKE HINKLEY CA 92347	Genera	or's Site Address	(if different th					
Generator's Phone: 7 6 0 7 6 2 . 3 1 0 0								
6. Transporter 1 Company Name MP Environmental Services				U.S. EPAID N		062	4 2 4	7
7. Transporter 2 Company Name				U.S. EPA ID N		002	7 - 7	
				1				
8. Designated Facility Name and Site Address CLEAN HARBORS BUTTONWILLOW 2500 WEST LOKERN RD BUTTONWILLOW CA 93208				U.S. EPA ID N	lumber			
Facility's Phone: 681 752-6200				CAD	9 8	0 6 7	5 2 7	7 6
9a. HM and Packing Group (if any))		10. Contair No.	ners Type	11. Total Quantity	12. Unit Wt./Vol.	13.	Waste Code	s
NON RCRA HAZARDOUS WASTE SOLID (OIL, DEBRIS THERMINOL) 2.	3 WTH	001	СМ	20	Υ	352		
2.								
3.								
4.				also a second				
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this conmarked and labeled/placarded, and are in all respects in proper condition for transport according Exporter, I certify that the contents of this consignment conform to the terms of the attached Exporter, I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large questions of the contents of the contents of the contents of the attached Exporter, I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large questions of the contents of this contents of this contents of the contents of the contents of the contents of the contents of this contents of the contents of th	ing to applicable into	ernational and national of Consent.	onal governm	ental regulations.		ipment and I	am the Prim	ary
18 International Shipments		1		7		17	131	20
Import to U.S.	xport from U.S.	Port of ent	try/exit:					
		Date leavi	ng U.S.:					-
Transporter 1 Printed/Typed Name	Signature	1 -1	4			Mon	nth Day	Yea
Transporter 2 Printed/Typed Name Transporter 2 Printed/Typed Name		11/11				17	7 31	120
Transporter 2 Printed/Typed Name	Signature	or gg				Mor	nth Day	Yea
18. Discrepancy								
18a. Discrepancy Indication Space Quantity Type	[Residue		Partial Rej	ection	[Full Rej	ection
18b. Alternate Facility (or Generator)	N	anifest Reference	Number:	U.S. EPA ID N	lumber			
				1				
Facility's Phone: 18c. Signature of Alternate Facility (or Generator)						Мо	onth Day	y Ye
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatme	ant dienoeal and ro	cycling systems)						
1. 2.	3.	oyomiy ayatema)		4.				
20 Designated Explifty Owner or Operator: Cortification of receipt of hazardous materials covered by	by the manifest ave	ent as noted in Itan	n 182					
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by Printed/Typed Name	Signature		,			Мо	nth Day	Yea
Edundo Jades		51	1-	1		17	1 131	120

TRUK 3920- 4FX 4027
Please print or type.

Form Approved. OMB No. 2050-003

1		IIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Nur		1 5 7	1 5	2. Page 1 of	1	58-3036	Phone	01	Tracking Nu	048	33 Ju	JK
		Generator's Name and Mailin LUZ SOLAR PAR 43880 HARPER L	ŤNERS AKE					Generator	d's Site Address ((if different th	an mailing addres				
П	1	HINKLEY CA 923 nerator's Phone: 7 6		2 . 3 1	0 0		- 1								
6. Transporter 1 Company Name U.S. EPA ID Number MP Environmental Services C A T 0 0 0									0 0 0	4 5 4	7				
7. Transporter 2 Company Name U.S. EPA ID Number										0 0 2	4 2 4	1			
		Designated Facility Name and CLEAN HARBOR	SBUTTONV	MLLOW		×					U.S. EPA ID I	Number			
Ш		2500 WEST LOKE BUTTONWILLOW													
П	Fac	cility's Phone: 881 76									CAE	98	067	5 2 7	б
	9a. HN			Shipping Nam	e, Hazard Class	, ID Number,		-	10. Contain No.	Type	11. Total Quantity	12. Unit Wt./Vol.	13.	Waste Code	S
8		1. NON RCRAH	AZARDOUS	WASTE	SOLID (O	L, DEBF	RIS WITH						352		
GENERATOR		THERMINOL)							001	СМ	15	Y			
SENE		2.													
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4		3.													
		4.													,P,
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	14.	Special Handling Instruction	4		1)PROF 268		_		RIS, SOIL		MINATED	WITH T	HERMIN	IOL	>
	15.	GENERATOR'S/OFFERO marked and labeled/placar Exporter, I certify that the of I certify that the waste mini	rded, and are in all re contents of this cons	espects in prop ignment confo	per condition for rm to the terms	transport according the attached	cording to applied EPA Acknow	icable inter /ledgment (national and nation of Consent.	onal governm	nental regulations	nipping name . If export sh	e, and are cla ipment and I	ssified, pack am the Prim	aged, ary
	Ger	nerator's/Offeror's Printed/Typ	,	a/ D	avies		Sig	gnature	neal	Da	17i0	Month Day Year			
INT'L		International Shipments	Import to	Konstant	WICS		Export from U	/	Date					-	100
		Insporter signature (for expor	rts only):				_ Export from t	0.5.	Port of ent						
RTE	Total	Transporter Acknowledgment	t of Receipt of Materi	als				0.5.	Date leaving						
l d	Irar	nsporter 1 Printed/Typed Nar	me	als				nature		ng U.S.:			Mor	- 1	Year
SS	Trar	nsporter 1 Printed/Typed Nar	me 100Re	ials			Sig	nature		ng U.S.:	ne		Mor	2 28	20
TRANSPORTER	Trar	nsporter 1 Printed/Typed Nar	me 100Re	ials			Sig			ng U.S.:	ne		Mor	2 28	
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TRANS	18.	nsporter 1 Printed/Typed Nar Geg M nsporter 2 Printed Typed Nar	me OORE		[Туре	Sig	nature		ng U.S.:	Partial Re	jection	Mor	2 28	Year
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1	18. 18a	nsporter 1 Printed/Typed Nar nsporter 2 Printed Typed Nar Discrepancy Discrepancy Discrepancy Indication Spa	me AOORE me Quan				Sig	gnature	Date leavin	ng U.S.:		. 0000000000	Mor	2 28 nth Day	Year
1	18. 18a	nsporter 1 Printed/Typed Nar nsporter 2 Printed/Typed Nar Discrepancy	me ADDRE me Quan ator)				Sig	gnature	Date leavin	ng U.S.:	Partial Re	. 0000000000	Mor Mor	2 28 nth Day	Year Action
1	18. 18a	nsporter 1 Printed/Typed Nar nsporter 2 Printed/Typed Nar Discrepancy n. Discrepancy Indication Spa n. Alternate Facility (or General distribution). Alternate Facility's Phone:	me ACC Quan ator) We get the control of the cont	tity	des for hazarde	Туре	Sig	inature inature Ma	Date leaving Part Residue Reference	ng U.S.:	Partial Re	. 0000000000	Mor Mor	2 28 nth Day	Year Action
DESIGNATED FACILITY ——→ TRANS	18. 18a	nsporter 1 Printed/Typed Nar nsporter 2 Printed/Typed Nar Discrepancy Discrepancy Discrepancy Indication Spa Discrepancy Indication Spa Discrepancy Indication Spa	me ACC Quan ator) We get the control of the cont	tity	des for hazardo	Туре	Sig	inature inature Ma	Date leaving Part Residue Reference	ng U.S.:	Partial Re	. 0000000000	Mor Mor	2 28 nth Day	Year Action
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Signature

d/Typed Name

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Month

Day

Form Approved, OMB No. 2050-0039

\land	U	NIFORM HAZARDOUS	1. Generator ID Number	2. Page 1 of	_			4. Manifest	Tracking No	021	<u> </u>	
	Ļ	WASTE MANIFEST	CAR000215715	1		424-930				0213	^ე ქქ	K
	5.	Generator's Name and Mailin	•		Generator's	Site Address	(if different ti	han mailing addres	SS)			
		43880 HARPER L	iners viii and ix - harper lai Ake rd.	er u								
	۵	HINKLEY enerator's Phone:	CA 92347	1				•				
$\ \cdot \ $		Transporter 1 Company Nam		,	_	-		U.S. EPA ID N	Number		,	
11			IRONMENTAL SERVICES							77036		
П	7.	Transporter 2 Company Nam	e					U.S. EPA ID N	lumber			
	Ļ	Designated Facility Name and	d Cita Address					U.S. EPA ID N	lumban			
		WORLD OIL RECY						U.S. EPA ID I	number			
	1	2000 N. ALAMEDA	A STREET									
11		COMPTON acility's Phone: 73101537	CA 90222 7-7100					CAT	8001	3352		
	9	a. 9b. U.S. DOT Description	on (including Proper Shipping Name, Hazard Class, ID	Number,		10. Contair	ners	11. Total	12. Unit	13 1/	/aste Codes	
Н	H	M and Packing Group (if a	any))			No.	Туре	Quantity	Wt./Vol.	10. 11	rasic codes	
١×		1. NON-RCRA H.	AZARDOUS WASTE, LIQUID (OIL	y water)						222		
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GENERATOR	┝	2.						\				
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	F	4.	J.									
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	١,										-	
П	14	. Special Handling Instruction	s and Additional Information									
11	١	EMERGENCY CON	NTACT: CHEMTREC 1-800-424-93	00 WOES TERM	AINAL:	FONTAN	A **A	PPROPRIAT	E PERS	ONAL		
$\ \ $		PROTECTIVE EQU	IPMENT*									
Н	15		R'S CERTIFICATION: I hereby declare that the conte									
		marked and labeled/placar Exporter, I certify that the o	rded, and are in all respects in proper condition for tran contents of this consignment conform to the terms of th	sport according to applic e attached EPA Acknowl	able interna edament of	tional and natio Consent.	onal governr	nental regulations.	If export sh	ipment and I a	m the Prima	ry,
П	Ļ	I certify that the waste min	imization statement identified in 40 CFR 262.27(a) (if I	am a large quantity gene	erator) or (b)	(if i am a sma	Il quantity ge	enerator) is true.		NA - 4		
\prod	G	enerator's/Offeror's Printed/Ty		Sign	nature ()	-11/6	2.	0		Monti	116	Year
+	16	. International Shipments	nningham			Sylvin State of the State of th				XE		
E	Ti	ansporter signature (for expo	Import to U.S.	Export from U	I.S.	Port of ent Date leavir				•		
띪		. Transporter Acknowledgmen				<u> </u>		Λ.				
TRANSPORTER	Tra	ansporter 1 Printed/Typed Nar	me O	Sigr	nature	m	161:	1		Monti	Day Ollo	Year
SP(ansporter 2 Printed/Typed Nai	MICAN	Sign	nature	<u>ww</u>		XUXI	r	Mont	_	Vest
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╠	18	. Discrepancy								- (
$\ \ $	18	a. Discrepancy Indication Spa	ace Quantity	Гуре	$\overline{\Box}$	Residue		Partial Rej	ection	-	Full Reje	ction
11				1,500		Toolado		r unduritoj	COLIOIT	_		311011
 -	10	b. Alternate Facility (or Gener	cotorl		Manif	est Reference	Number:	U.S. EPA ID N	lumbor			
늘	۱"	b. Alternate I admity (di Gerten	atory					0.3. EFAID I	uitibei			
FAC	Fa	cility's Phone:						1				
旧		c. Signature of Alternate Facil	lity (or Generator)	<u>.</u>				I		Mon	th Day	Year
DESIGNATED FACILITY												
S	_	. Hazardous Waste Report Ma	anagement Method Codes (i.e., codes for hazardous w	vaste treatment, disposal	, and recycli	ng systems)		14				
P P	1.	1-1079	$ a ^2$	3.				4.				
	20	. Designated Facility Owner o	or Operator: Certification of receipt of hazardous materi	als covered by the manif	est except a	s noted in Item	n 182					
		nted/Typed Name	/		nature	Ma 1	1/1/	NAST.		Mont	th Day	Year
↓		SOTITA	FL F. SVAY			U.S.			2/	101		120
EP#	١F٥	orm 8700-22 (Rev. 12-17)	Previous editions are obsolete.		-	/ DES	IGNATE	D FACILITY	TO EPA	's e-MĀN	IFEST S	YSTEM

Ple	ase print or type.							Form	Approved.	OMB No.	2050-003
1	UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number		-	rgency Response 458-3036	Phone	4. Manifest	Tracking Nu 178	201	1 J.	JK
	5. Generator's Name and Mailing Address LUZ SOLAR PARTNERS 43880 HARPER LAKE HINKLEY CA 92347 Generator's Phone: 7 6 0 7 6 2 3 1 0 0										
	6. Transporter 1 Company Name MP Environmental Services					U.S. EPA ID Number C A T 0 0 0 8 2 4 2 4 7					
	7. Transporter 2 Company Name					U.S. EPA ID Number					
П	Designated Facility Name and Site Address					U.S. EPA ID N	Number				
	CLEAN HÀRBORS BUTTONWILLOW 2500 WEST LOKERN RD BUTTONWILLOW CA 93206										
Ш	Facility's Phone: 661 762-6200				40.0.44		CAD98067527			/ 0	
	9a. HM 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))				10. Contain No.	11. Total Quantity	12. Unit Wt./Vol. 13. Waste Codes		s		
GENERATOR -	 NON RCRA HAZARDOUS WASTE SOLID (OIL, DEBRIS WITH THERMINOL) 			MTH	001	СМ	12	Y	352	2	
GENER	2.			1			- 4				
	3.				2 2		* * * * * * * * * * * * * * * * * * *				
	4.									van andre van de va	
П											
	15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true. Generator's/Offeror's Prinjed/Typed Name Signature Month Day Year										
1	Ben Wils	on		130	n W.	uso	n		11	09	2020
Transporter signature (for exports only): 16. International Shipments					3		V BIC				
ER	17. Transporter Acknowledgme	The second secon			0 1		- W				
Transporter 1 Printed/Typed Name				Signature					Year		
TRANSPORTER	Transporter 2 Printed/Typed Name			Signature	Mul	ned I			th Day	Year	
F											
	18a. Discrepancy Indication Space Quantity Type Residue Partial Rejection Full Rejection										
DESIGNATED FACILITY	18b. Alternate Facility (or Generator) Manifest Reference Number: U.S. EPA ID Number										
ED FA	Facility's Phone: 18c. Signature of Alternate Facility (or Generator)										
GNAT	19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)									Year	
ESI	тэ. наzardous Waste Report N		for hazardous waste treatment, o	lisposal, and rec	ycling systems)	5					
	H132	2.		3.			4.				
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a Printed/Typed Name						18a					
\downarrow	JURGC.	town		Signature	2				Mont	th Day	Year
EPA	Form 8700-22 (Rev. 12-17)	Previous editions are obsolete.			DESIG	SNATED	FACILITY	TO EPA'	s e-MAN	IFEST S	YSTEM

2020 ANNUAL COMPLIANCE REPORT

SEGS VIII & IX

Heat Transfer Fluid Shipments

There were no HTF shipments to the SEGS VIII and IX facilities in 2020.

2020 ANNUAL COMPLIANCE REPORT II. BIOLOGICAL RESOURCES / WASTE MANAGEMENT

SEGS VIII & IX

BLM Habitat Well Water Usage



Annual Verification Report Form and

Printed on: 09/28/2020

Invoice #: 42513

Invoice for Administrative & Biological Assessments 4th Quarter (July 1 - September 30) 2019-20 Water Year

Account Number Lake Count Harper Lake Count Harper Hinkley, CA 9	Free Production Allowance (FPA): Prior Year Carryover: FPA Transfers In: FPA Transfers Out: Carryover Transfers In: Carryover Transfers Out: Total Adjusted FPA:				1,075 Ac-ft 1,147 Ac-ft 0 Ac-ft 0 Ac-ft 0 Ac-ft 0 Ac-ft 2,222 Ac-ft		
State Well Number	Local Well Designation	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter Production	Current Well Status*	Estimated Annual Production
11N04W19E01	WELL #34	0.00	.08	0,00	2.26	A	2.34
11N04W19E02	WELL #35	86.29	78,53	188.90	205.93	Á	559.65
11N04W19J01	WELL #40	7.14	10.54	133.38	166.17	Α	317.23
11N04W19Q02	WELL #36	1.45	3.04	2.90	1,79	Α	9.18
11N04W28R01	BLM Habitat Well	0.00	0.00	0.00	0		, de
11N04W28R02	BLM Habitat Well #02	17.66	16.54	26.31	26.01	Ä	86.52
11N05W24L01	WELL #37	0.00	0.00	0.00	0	I	0
11N05W24P02	WELL #38	0.00	0.00	0.00	9	ī	0
11N05W24Q02	WELL "D"	0.00	0.00	0.00	Ð	I	Ð
* A=Active I=Inactive	Totals:	112.54	108.73	351,49	402.16	Ac-Ft	974.92
S=Sold D=Destroyed L=Leased B=Abandoned	estroyed Administrative Assessment @ \$ 3.55 per Ac-Ft						
U=Unknown M=Monitoring T=Standby	### Biological Assessment @ \$ 0.95 per Ac-Ft ####################################						
Total Amount Due \$ 1,809.72							
Please indicate in the space below, the contact person you wish to receive all Watermaster mailings and their address. Neal Davies 43880 Harper Lake Rd.						ir address.	

Contact	Mailing Address
760-762-3100 XZZS	_ <u>HINKle</u> v CA 92347
Phone	City State Zip Code
I declare under penalty of perjury that	at the foregoing information is true and correct:
	Terra-GEN Operating Company
Neal Davies	Company Neal Davies
Individual 10 - 5 - 2020	Company Agent 10-5-2020
Date	Date

Payment is due and payable October 31, 2020.

2020 ANNUAL COMPLIANCE REPORT II. BIOLOGICAL RESOURCES / WASTE MANAGEMENT

SEGS VIII & IX

2020 BRMIP Statement of Compliance



CARLSBAD
FRESNO
IRVINE
LOS ANGELES
PALM SPRINGS
POINT RICHMOND
RIVERSIDE
ROSEVILLE
SAN LUIS OBISPO

January 29, 2021

Neal Davies Terra-Gen Operating Company 43880 Harper Lake Road Hinkley, CA 92347

Subject: Biological Resources Mitigation Implementation Plan (BRMIP) Compliance

Dear Mr. Davies:

The Solar Energy Generating Systems (SEGS) VIII and IX facilities conducted all activities from January 1, 2020, to December 31, 2020, in compliance with the approved Biological Resources Mitigation Implementation Plan (BRMIP) and the portions of the California Energy Commission decision pertinent to biological resources.

Sincerely,

LSA Associates, Inc.

Richard a. Einter

Richard A. Erickson Designated Biologist

CONDITIONS OF CERTIFICATION

SEGS VIII and IX

Condition 4

LUZ Solar Partners VIII and IX received no complaints from property owners or the public regarding problems due to induced voltages on vehicles, portable objects, metallic roofs, metallic building sidings, gutters, fences, irrigation equipment or other objects within the right-of-way for the calendar year 2020.

Condition 5

LUZ Solar Partners VIII and IX received no complaints of radio and television interference attributed to the transmission line facilities for the calendar year 2020.

Condition 6

LUZ Solar Partners VIII and IX maintained each transmission line pole site free of waste material and rubbish for the calendar year 2020.

2020 ANNUAL COMPLIANCE REPORT

SEGS VIII & IX

Transmission Line Inspection

2020 Inspection

The transmission line between the Harper Lake facilities and Kramer Junction was inspected in April 2020. The transmission line poles were free of waste material and rubbish.

Diesel Fuel Data

2020 Diesel Fuel Purchases provided under separate cover.

2020 Facility Status

SEGS VIII

Power OutputPrimary EnergyNatural Gas Use125,616 Gross MWh1,430,526 mmbtu5,688 mmbtu

SEGS IX

Power OutputPrimary EnergyNatural Gas Use160,886 Gross MWh1,824,504 mmbtu315,764 mmbtu

Power Plant Reliability

SEGS VIII - 2020 Production Data

	Net Electrical Production	Monthly On- Peak	Plant Availability		
Jan	584		44.5%	6.0%	100%
Feb	6,344	0.0%	21.9%	5.6%	100%
Mar	6,878		21.9%	5.1%	98%
Apr	11,521		35.7%	9.6%	100%
May	17,054		55.1%	14.9%	99%
Jun	13,415	53.5%	27.7%	10.8%	92%
Jul	21,549	81.0%	41.5%	17.8%	100%
Aug	15,468	62.5%	26.6%	14.9%	100%
Sep	8,681	38.6%	14.1%	8.2%	100%
Oct	7,652	0.0%	23.7%	6.1%	100%
Nov	3,733	-	13.3%	2.9%	100%
Dec	2,020	-	6.3%	1.6%	100%
Year	114,899				99%

SEGS IX - 2020 Production Data

	Net Electrical Production	Monthly On- Peak	Plant Availability		
Jan	564		42.1%	6.2%	100%
Feb	5,884	0.0%	20.7%	5.0%	72%
Mar	7,534		23.9%	5.6%	98%
Apr	12,093		37.4%	10.2%	100%
May	19,331		60.8%	17.2%	100%
Jun	22,108	98.1%	40.3%	17.1%	100%
Jul	24,771	100.7%	45.6%	19.0%	100%
Aug	21,886	100.4%	38.3%	17.3%	100%
Sep	16,423	91.5%	20.6%	12.5%	99%
Oct	8,293	0.0%	26.2%	6.3%	100%
Nov	4,166		14.6%	3.4%	100%
Dec	2,420		7.6%	1.9%	100%
Year	145,474		<u></u>		97%

Compliance Matrix

COMPLIANCE REQUIREMENTS FOR SEGS VIII & SEGS IX						
	Date: February 07, 2016					
CONDITION	ISSUE	SUBMIT TO	PERMIT REQUIREMENTS	STATUS		
			AIR QUALITY			
AQ 1-1 IX AQ 1-1 VIII	Restrict heater NO _x emissions <328.5 lb/day Low NO _x burners		Effective 6/1/92 Install low NO _x burners	Deleted May 10, 2001 Complete		
AQ 1-2 IX AQ 1-2 VIII	NO _x emission controls to Southern Cal Gas engines NO _x emissions	CEC CPM	Must be modified by 6/1/91 Monitor NO _x emissions at III, IV & VIII. Submit Quarterly Compliance Reports.	Complete Deleted May 10, 2001		
AQ 1-3b IX	Tests of modified engines	MDAQMD CPM	Source tests for modified engines	Ongoing Currently under review		
AQ 1-3, AQ1- 4 VIII AQ 1-4b IX	PM10 control	CEC CPM	Provide PM10 control plan & mitigation Treat roads with magnesium chloride as needed for fugitive dust control	Complete MgCl applied to Hoffman, Lockhart & Santa Fe Roads		
AQ 1-5	Revised PM10 emission limit		Revise PM10 limits after workshop	Complete		

COMPLIANCE REQUIREMENTS FOR SEGS VIII & SEGS IX Date: February 07, 2016 CONDITION ISSUE PERMIT REQUIREMENTS **SUBMIT STATUS** TO AQ1-6 PM10 control Treat roads with magnesium chloride See AQ 1-4 AQ 1-7 Source test protocol for Submit protocol for measuring Complete cooling tower PM101 AQ 1-8 Test requirements for Comply with requirements in cooling Complete cooling tower tower source tests AQ 1-10 Collect SEGS VIII data, Report occasions when $NO_x > 300$ Complete $NO_x > 300 lb/day data$ lb/day from 3/1/90 to 12/31/92 collection Comply with all applicable rules of AQ 1-11 Applicable district rules CEC Ongoing **SBCAPCD** VIII & IX Annual report Ongoing CEC Other applicable rules Compliance with applicable federal AQ 1-12 Ongoing VIII & IX and State rules Quarterly report Ongoing AQ 1-13 Permit conditions **MDAQMD** Any changes to MDAQMD required Ongoing, as required emission controls subject to review VIII & IX CEC AQ 1-14 **BACT** requirement **MDAQMD** Specifies emission limits Ongoing VIII & IX AQ 1-15 Design changes **MDAQMD** Modification to heaters requires Ongoing, as required MDAQMD approval VIII & IX CEC

COMPLIANCE REQUIREMENTS FOR SEGS VIII & SEGS IX Date: February 07, 2016 CONDITION ISSUE PERMIT REQUIREMENTS **SUBMIT STATUS** TO AQ 1-19 Malfunction / Breakdown **MDAQMD** Promptly notify MDAQMD of any Ongoing VIII & IX **Provisions** violations AQ 1-20 Right to Entry **MDAQMD** Permit authorized personnel to enter Ongoing for inspection. Have records available CARB. VIII & IX for inspection. EPA, CEC **MDAQMD** AQ 1-21 Transfer of Ownership Notify by letter succeeding owners & Ongoing, as required VIII & IX CEC operators that the Commission Decision\Permit to Operate is binding on all subsequent owners & operators AQ 1-23 Emission limits during Use best heater operation Complete installation and testing Approval for heater test >16 hours Verify 25 ppm by source test If NO_x emissions above lbs/day limit PTO modified 1. Submit plan for approval 2. Implement changes AQ 1-24 Operational phase **MDAQMD** Restrict heater consumption to no Deleted May 10, 2001 VIII & IX more than 9.5×10^6 therms Operate cooling tower <4,000 hrs/yr Ongoing Perform heater compliance testing Ongoing annually Submit gas use data & circ water Ongoing pump daily hrs of operation in quarterly report Submit results of Heaters Compliance Testing in Annual Compliance Report

	COMPLIANCE REQUIREMENTS FOR SEGS VIII & SEGS IX					
				Date: February 07, 2016		
CONDITION	ISSUE	SUBMIT TO	PERMIT REQUIREMENTS	STATUS		
			along with daily Heaters Nat Gas consumption and Cooling Tower Fans' daily hrs of operation.			
AQ 1-25	Fuel use		Use only commercial grade natural gas as fuel	Ongoing		
AQ 1-26 VIII & IX	Opacity limits	MDAQMD	Monitor visible emissions	Ongoing		
AQ 1-27	CEMS		Submit CEMS plan for approval Order and install CEMS Certification test; cylinder gas audit and RATA tests Test report	Complete Complete Ongoing Ongoing		
AQ 1-28 VIII & IX	Compliance test	MDAQMD CEC	Submit revised plan for approval Conduct test Test particulates every fifth year	Ongoing		
AQ 1-29 VIII & IX	Monitoring plan\ Reporting requirements	MDAQMD CEC CPM	Have a Monitoring Plan. Submit quarterly reports to MDAQMD Daily NO _x emissions in ppm and lbs/hr Quarterly total tons emitted for NO _x based on CEMS data	Ongoing		

	COMPLIANCE REQUIREMENTS FOR SEGS VIII & SEGS IX					
				Date: February 07, 2016		
CONDITION	ISSUE	SUBMIT TO	PERMIT REQUIREMENTS	STATUS		
			Quarterly total tons for particulate and CO based on compliance test and fuel consumption Number of exceedances of permit limits, the corresponding maximum & duration of each exceedance Rolling average NO _x emissions for HTF heaters, diesel generators, diesel fire pumps When CEMS data is missing, use previous 24 hours of NO _x emission data Records of fuel oil purchase, sulfur content, quantity and Btu content Natural gas consumption Submit annual reports to CEC Send quarterly reports to MDAQMD			
AQ 1-30 VIII & IX	Operating logs	MDAQMD CARB CEC	Maintain daily operating logs & charts on-site; retain for 1 year	Ongoing		
AQ 1-31	Air monitoring		Monitor air quality and submit data Obtain approval to cease	Complete		
AQ 1-32	Fugitive dust controls		Comply with MDAQMD 401, 402 & 403. Have an approved Dust Control Plan.	Ongoing		
AQ 1-33		MDAQMD		Ongoing		

COMPLIANCE REQUIREMENTS FOR SEGS VIII & SEGS IX Date: February 07, 2016 CONDITION ISSUE PERMIT REQUIREMENTS **SUBMIT STATUS** TO CEC VIII & IX Diesel Gen Set & Fire Submit data in quarterly report to incl records of fuel oil purchased, sulfur Pump: Use low sulfur content, quantity, and BTU value. diesel, submit records Diesel generator and fire pump fuels must contain less than 0.5% sulfur by weight AQ 1-34 Control of unregulated **MDAOMD** Do not use hexavalent chromium Ongoing pollutants compounds in cooling tower water VIII & IX CEC circulating system Ongoing AQ 1-37 **Emission limits MDAQMD** NO_x limit at 547 lbs/day for aggregate IX CEC of all equipment and 45.9 tons on rolling annual average. AQ 1-38 Ongoing Restrict CO & particulate emissions to VIII values in tables I. II. & III Ongoing Submit above data in quarterly report AQ 1-38 Missing CEMS data **MDAQMD** Use average data when CEMS is out Ongoing IX of service. CEC AQ 1-39 Submit Missing Data Nox emissions VIII calculations in Quarterly Report AQ 1-39(4) Notification and **MDAOMD** Notify EPA and APCD if emissions Ongoing exceed 547 lbs/day average IX recordkeeping **EPA** AO 1-40(4) CEC Maintain five-year file of CEMS data VIII MDAQMD AQ 1-40 Ongoing, as needed

	COMPLIANCE REQUIREMENTS FOR SEGS VIII & SEGS IX						
	Date: February 07, 201						
CONDITION	ISSUE	SUBMIT TO	PERMIT REQUIREMENTS	STATUS			
IX AQ 1-41 VIII	Prevention of significant deterioration	CEC	Review emission changes for 100- ton/year level If site is a major source, file for PSD permit	Ongoing, as needed			
AQ 1-41 IX	HTF heater operation		Correct SEGS VIII heater design that caused accident Agency approval before firing IX	Complete Complete			
		BIO	LOGICAL RESOURCES				
BR 1 (BRMIP 5.0)	Habitat compensation		Enter into agreement with CDFG Provide for Mohave ground squirrel habitat Provide for off-site desert tortoise habitat Transfer title of ownership to CDFG Deposit land purchasing funds Provide funds for enhancement and management including Annual Maintenance payments. Provide CEC with signed copy of agreement with CDFG Notify CEC of land purchases, subject to consultation with CDFG, BLM and USFWS	Complete			
BR 2			Submit signs, letters, etc. to the CEC	Complete			

COMPLIANCE REQUIREMENTS FOR SEGS VIII & SEGS IX Date: February 07, 2016 CONDITION **ISSUE** PERMIT REQUIREMENTS **SUBMIT STATUS** TO VIII Public notice of habitat compensation BR 2 Designated biologist Submit qualifications of biologist to Complete (BRMIP 2.0) CEC for approval. If change Ongoing, as required biologists, submit qualifications for IX BR 3 approval. VIII Surface disturbance Designate off-limit areas Complete BR 3 Obtain approval from designated Ongoing, as required (BRMIP 4.1) restrictions biologist for any surface disturbance BR 4a VIII Off-road travel restrictions Prohibit off-road travel in sensitive Complete BR 4 (BRMIP 4.2) biological areas. Post signs, Include Ongoing (for Operations) in Environmental Awareness Training. IX BR 4b VIII Transmission line plant Identify botanically sensitive areas Complete BR 4c along transmission line VIII survey Temporary travel ways Designate temporary travel ways Complete BR 4d along the transmission lines VIII Wildlife preservation Identify active desert tortoise & Complete BR 4e Mohave ground squirrel burrows VIII along transmission lines

COMPLIANCE REQUIREMENTS FOR SEGS VIII & SEGS IX					
				Date: February 07, 2016	
CONDITION	ISSUE	SUBMIT TO	PERMIT REQUIREMENTS	STATUS	
			Obtain MOU from CDFG Salvage & relocate desert tortoises as needed	Complete Complete	
BR 4h VIII BR 8 IX (BRMIP 4.6)	Employee Awareness Training	CEC CPM USFWS CDFG	Provide training to new employees; keep records Provide brochure to contractors Post brochure	Ongoing Ongoing	
BR 4j (BRMIP 4.10) VIII	Anti-perching devices		Install anti-perching (Nixalite) devices on transmission line towers & poles Monthly inspection by designated biologist during raven nesting season for at least 5 years	Complete Complete	
BR 5 IX (BRMIP 4.3)	Desert tortoise preservation		Salvage & relocate desert tortoises as needed Obtain MOU from CDFG Obtain Section 7 Consultation from USFWS	Ongoing Complete Complete	
BR 5 VIII	Wetlands Enhancement Plan	CEC CPM	Submit plan for approval Discharge blowdown to north marsh unless detrimental to wildlife In lieu of marsh discharge, construct evap ponds	Deleted April 26, 2000 Deleted April 26, 2000 Deleted April 26, 2000	

COMPLIANCE REQUIREMENTS FOR SEGS VIII & SEGS IX						
	Date: February 07, 2016					
CONDITION	ISSUE	SUBMIT TO	PERMIT REQUIREMENTS	STATUS		
			Monitor water quality & wildlife usage of wetlands or ponds			
BR 6 (BRMIP 4.4) BR 4f VIII	Desert tortoise fencing	CEC	Construct permanent tortoise-proof fence around facility Fence design approval from CEC/CDFG/ USFWS/BLM Construct tortoise fence on HLR	Complete Complete Complete		
BR 7 (BRMIP 4.5) IX BR 4g VIII	Speed limits		Post speed limits along travel ways Obtain approval from CDFG	Complete Complete		
BR 8 (BRMIP 4.6) IX	Employee environmental awareness program	CEC	Provide educational brochure Conduct employee orientation Distribute "Sensitive Wildlife Observation Forms" to all employees Collect employee signed affidavits	Complete Ongoing, as required Complete Complete		
BR 8 (BRMIP 7.0) VIII	Central & southern wetlands study		Submit study protocol to CEC for approval Conduct investigations of central & southern marshes for two years Convey discharge water to marshes	Complete Payment pending On hold, pending COC amendment		
BR 9				Complete		

COMPLIANCE REQUIREMENTS FOR SEGS VIII & SEGS IX Date: February 07, 2016 **CONDITION ISSUE** PERMIT REQUIREMENTS **SUBMIT STATUS** TO IX Trash and litter control Supply covered trash and litter receptacles in strategic locations (BRMIP 4.7) program Complete Bury trash and litter or dispose of in BR 4i covered dumpsters VIII Monitor agricultural discharge to Complete BR 9 Agricultural discharge to VIII wetlands southern & central marshes (BRMIP 8.0) Notify CEC of any changes in Complete discharge volumes Provide supplemental well water to Complete discharge water as needed BR 10 Restoration/revegetation of Complete Habitat restoration temporarily disturbed areas IX (BRMIP 4.8) BR 4k VIII Evaporation pond Maintain appropriate pond depth Ongoing BR 11 (BRMIP 6.0) Maintain fencing monitoring plan IX Conduct annual invertebrate sampling Ongoing Conduct lab analysis of samples Ongoing Notify CEC and CDFG if selenium Ongoing, as required levels exceed 4 ppm Submit quarterly pond monitoring Ongoing report to CDFG Ongoing

	COMPLIANCE REQUIREMENTS FOR SEGS VIII & SEGS IX					
					Date: February 07, 2016	
CONDITION	ISSUE	SUBMIT TO	PERMIT REQUIREMENTS		STATUS	
			Allow up to 75 ac ft of water per year to BLM for north marsh enhancement. Submit annual BLM usage to CEC.			
BR 11 (BRMIP 6.0) VIII	Transmission line mitigations		Prepare transmission line mitigation measures Submit transmission line mitigations for CEC approval Implement transmission line mitigation measures	Complete Complete Complete		
BR 12 (BRMIP 8.0)	BRMIP approval		Submit BRMIP to CEC for approval	Complete		
BR 13 (BRMIP 8.0) IX BR 6 VIII	Implement and monitor compliance issues	CEC CPM	Submit monthly compliance status report to CEC Submit annual compliance report from designated biologist to CEC Notify CEC of any adverse impacts to sensitive species	Complete Ongoing Ongoing		
BR 14 (BRMIP 8.0) IX BR 7 VIII	Site access		Provide letter of authorization to CEC	Complete		
BR 3-BR 11	Weekly activity report		Notify CEC in the weekly report	Ongoing		

COMPLIANCE REQUIREMENTS FOR SEGS VIII & SEGS IX							
	Date:						
CONDITION	ISSUE	SUBMIT TO	PERMIT REQUIREMENTS	STATUS			
		W	VATER RESOURCES				
WR 1	Well logs and data		Submit logs and data	Complete			
WR 2 VIII & IX	Extracted groundwater consumption	CEC CPM LRWQCB	Provide for each well extracting groundwater in Annual Compliance Report: standing water levels, pumping rates, total water extraction	Ongoing			
WR 3	Water well flow meters		Submit as-built drawings to CEC	Complete			
WR 4 IX	Water supply	CEC LRWQCB	Limit groundwater extractions to 950 acre/ft per yr; provide data	Ongoing			
WR 4 VIII	NPDES permit for cooling tower blowdown		Obtain WDR from LRWQCB	Complete			
WR 6 IX	Waste discharge requirements (WDR) for condensate system		Obtain WDR from LRWQCB	Complete			
WR6 VIII	Liquid discharge to ponds	CEC CPM	Inform CEC of change in WDR's Submit with Annual Report copies of quarterly reports to LRWQCB and status of current waste disch requirements	Ongoing			
WR 7			Obtain WDR from LRWQCB	Complete			

COMPLIANCE REQUIREMENTS FOR SEGS VIII & SEGS IX						
	Date: February 07, 2010					
CONDITION	ISSUE	SUBMIT TO	PERMIT REQUIREMENTS	STATUS		
IX WR 5 VIII	WDR for cooling tower blowdown					
WR 7 VIII	Erosion control plan		Submit plan to CEC	Complete		
WR 8 IX WR 6 VIII	Water Quality	CEC CPM LRWQCB	Notification of changes in LRWQCB WDRs Quarterly reports Submit status of current WDRs	Ongoing, as required Ongoing Ongoing, as required		
WR8 VIII	Flood Hazard	CEC CPM	Protect adjacent private property from flooding, scouring & erosion as result of operations Submit Annual statement in Annual Compliance Report describing any maintenance or repairs on adjacent private property due to flooding, scouring, erosion	Complete Ongoing, as required		
WR 9	Protect land from runoff for 25-year (not 100) storm		Construct dike along north boundary of Section 13 Prepare as-builts	Complete Complete		
WR 10 IX WR 12 & 13 VIII	Water flow easements		Obtain easements or provide flood protection	Complete		

COMPLIANCE REQUIREMENTS FOR SEGS VIII & SEGS IX					
				Date: February 07, 2016	
CONDITION	ISSUE	SUBMIT TO	PERMIT REQUIREMENTS	STATUS	
WR 11	Extend 100 year dike & channel to southern border of Section 25		Certify to CEC that dike & channel will be built	Complete	
WR 14 VIII	Well permits	CEC CPM	Submit all copies of well drilling permits in Annual Compliance Report	Ongoing	
		S	SOCIOECONOMICS		
SE 4 IX SE 2c VIII	Payments to schools	CEC	Submit copies of checks Submit copies of signed agreements	Complete Complete	
SE 7 VIII	Impacts to local fire protection	CEC CPM	Mitigate impacts caused to local fire protection agencies Identify demand placed on local agencies in Quarterly Reports & specify agency costs paid by LSP. CEC may require additional compensation.	Ongoing	
SE 8	Fire protection agreement		Sign agreement	Complete	
PUBLIC HEALTH					
PH 1	HTF barrier	CEC		Complete	

COMPLIANCE REQUIREMENTS FOR SEGS VIII & SEGS IX Date: February 07, 2016 **CONDITION ISSUE SUBMIT** PERMIT REQUIREMENTS **STATUS** TO SBCCBO Prepare plan for barriers to protect Complete HTF piping Submit plan Complete Install barriers PH 2 HTF release plan CEC Submit documentation of procedures Complete Inform CEC of training schedule Complete Develop/implement plan Construction employee CEC Complete PH 3 protection plan Install required equipment Complete Employee protection plan Develop/implement plan Complete PH 4 CEC Install required equipment Complete PH 5 Protective equipment CEC Provide equipment Complete IX PH 5 Materials handling Submit procedures to CEC Complete VIII procedures Cooling tower water CEC Obtain written approval for use of Ongoing, as required PH 6 chemicals not in Table 2 VIII & IX treatment CEC PH 7 Extremely hazardous Do not use chemicals listed extremely Ongoing, as required hazardous without an approved Risk IX materials Management Prevention Program

COMPLIANCE REQUIREMENTS FOR SEGS VIII & SEGS IX							
	Date: February 07, 2016						
CONDITION	ISSUE	PERMIT REQUIREMENTS	STATUS				
		WA	ASTE MANAGEMENT				
WM 1 VIII & IX	Disposal of hazardous & non-hazardous wastes		Dispose of waste at approved facilities Provide verification to CEC via compliance reports	Ongoing, as required Ongoing, as required			
WM 2	Solid waste management plan		Submit plan to CEC □6 months after project certification	Complete			
WM 3 IX WM 6 VIII	Waste summary report	CEC CPM	Submit description of project related hazardous waste, including: quantity and type of waste, disposal methods, and facilities used	Ongoing			
WM 3 VIII	Use of alternative anti- corrosion agent	DHS CEC CPM LRWQCB	If anti-corrosive agent is used, test waste for hazardous determination Obtain waste discharge permit from LRWQCB if required	Ongoing, as required Ongoing, as required			
WM 4 IX WM 2 VIII	Hazardous waste generator permit for HTF		Obtain permit from DTSC (CDHS)	Ongoing			

COMPLIANCE REQUIREMENTS FOR SEGS VIII & SEGS IX **Date: February 07, 2016 CONDITION ISSUE** PERMIT REQUIREMENTS **SUBMIT STATUS** TO WM 5 Hazardous waste storage DHS If hazardous waste is stored over 90 Ongoing, as required CEC days obtain determination IX CPM Ongoing, as required Notify if Hazardous Waste Facility WM4 VIII Permit is granted by DHS Store & dispose of waste per DHS Ongoing regulations WM 5 Sanitary waste disposal **Submit** VIII Waste-related enforcement CEC Notify CEC of any action against Ongoing, as required WM 6 IX **CPM** owner or waste handlers action **WM** 7 VIII **WM** 7 HTF shipment records CEC Maintain records of all HTF shipments Ongoing IX CPM **WM** 8 VIII HTF spill □20 gallons CEC Notify CEC within 48 hours Ongoing, as required **WM8** Submit written verification of the spill IX CPM WM9 & clean-up measures VIII WM 9 HTF spill cleanup to <3000 CEC Clean up spills to level that leaves < Ongoing, as required IX CPM 3000mg/kg of HTF in soil ppm WM 10

COMPLIANCE REQUIREMENTS FOR SEGS VIII & SEGS IX								
	Date: February 07, 2016							
CONDITION	ISSUE	SUBMIT TO	PERMIT REQUIREMENTS	STATUS				
VIII			Submit spill report to CEC within 30 days Submit a manifest of disposed HTF					
WM 11 VIII	Solid waste management plan		Submit plan to CEC < 6 months after project certification	Complete				
		PUBLIC	C AND WORKER SAFETY					
PWS 1	Heater Operating, SUS, and Emergency SD Procedure and Operator Training Program	CEC CPM	Procedure to also address errors that could result from operation of different heater designs by same personnel in same control room. Staff Training on these procedures.					
PWS 2	Yearly Status Reports	CEC CPM	Yearly Status Reports on Equipment Failures and effectiveness of inspection and maintenance procedures on critical systems.					
	SAFETY & FIRE PROTECTION							
ISFP 1 IX PWFS 1	Safety plan	CEC CPM	Implement Safety Plan Provide access to project area, facilities & maintain records	Complete Ongoing				
ISFP 2	Certificate of Occupancy		Obtain certificate from SBCFFW	Complete				

COMPLIANCE REQUIREMENTS FOR SEGS VIII & SEGS IX								
	Date: February 07, 2016							
CONDITION	ISSUE	SUBMIT TO	STATUS					
			Submit copy to CEC	Complete				
PWFS 2 VIII ISFP p. 386	Fire protection element of safety plan Fire safety		Develop fire brigade training program Maintain fire-fighting equipment	Complete Ongoing				
		POWI	ER PLANT RELIABILITY					
PPR 1	Preventive maintenance program		Inventory management plan Maintenance and repair training program	Complete Ongoing				
PPR 2 VIII & IX	Operational Logs	CEC CPM	Maintain logs of equipment failure data & operational data for all major equipment Maintain monthly operational data	Ongoing				
	QUALIFYING FACILITY STATUS							
QFS 1 VIII & IX		CEC CPM	Operate facility in accordance with requirements of Title 18 CFR Continuously monitor total energy input	Ongoing				

COMPLIANCE REQUIREMENTS FOR SEGS VIII & SEGS IX									
	Date: February 07, 2016								
CONDITION	ISSUE	STATUS							
	TRANSMISSION LINE SAFETY & NUISANCE								
TLSN 6 VIII & IX									
		FACILITY SE	CURITY & DECOMMISSIONING						
DC 1 VIII	Decommissioning	CEC CPM	File decommissioning plan	12 months before decommissioning					
FS/DC 2 IX	IX CPM 25th year of operation			Ongoing, as required					
FS/DC 3 IX	Decommissioning	CEC CPM	Obtain approval prior to decommissioning activities	12 months before decommissioning					
FS/DC 1 IX	Updates to security & facility maintenance plan	CEC CPM	Submit updates to Plan, including the adequacy of the security/decommissioning fund	Ongoing					
MISCELLANEOUS									

COMPLIANCE REQUIREMENTS FOR SEGS VIII & SEGS IX Date: February 07, 2016 **CONDITION ISSUE** PERMIT REQUIREMENTS **SUBMIT STATUS** TO Noise complaints Develop noise complaints program N 1 Complete CEC N 2 Public noise surveys Conduct surveys & submit report Complete N 3 Occupational noise surveys CEC Conduct surveys & submit report Complete N 4 IC engine noise Install mufflers Complete PCR 1-8 Paleontological & cultural All surveys, plans & reports Complete resources PCR 7 Final paleontological Submit final report to CEC Complete Submit final report to Paleo Library resources report Maintain files showing proof of **PCR 13** Cultural resources found Complete cultural resource analysis **PCR 15** Final cultural resources Maintain on file Complete report **PCR 16** Agreements for cultural Maintain on file Complete resource curation In Quarterly Reports notify the CEC **Transportation Permits** TT1 CEC CPM of any Transportation Permits submittal **TT** 5 Sign agreement 60 days after CEC Request to amend; COC pending decision IX

COMPLIANCE REQUIREMENTS FOR SEGS VIII & SEGS IX						
Date: February 07, 2						
CONDITION	I ISSUE SUBMIT PERMIT REQUIREM TO			STATUS		
	Agreement for reconstruction of Harper Lake Road					
TT7 VIII TT6 IX	Accident occurrences on the 4 San Bernardino roads	CEC CPM & SBCFCTD	Monitor and Report in Quarterly Reports traffic accident occurrences on the 4 roads. Report on current status of consultations with SBC Flood Control & Transportation Dept.			
TT 11 VIII	Railroad crossing gate/signal/light installation		Submit construction plan to CEC	Complete		
TT 12	Maintenance Plan for Hoffman Road		Submit Hoffman Rd Maintenance Plan prior to Operations			
VR 1	Exterior color scheme for buildings		Submit color plan to CEC	Complete		
VR 2	Light shielding		Install light shields and reposition lights	Complete		
VR 3	Visual screening		Develop plan Submit plan to CEC Notify CEC after installation	CEC surveyed neighbors No changes required No installation necessary		

Construction/Operation Schedule

2021 Operation Schedule

<u>January</u>

We anticipate firing heaters only for freeze protection during the month of January. This operation is necessary when the temperature of HTF in the system is less than, or equal to, 100° F. The heaters are fired until the HTF system temperature reaches approximately 300° F. The amount of gas budgeted for freeze protection is 1,500 kscf per plant. Solar field thermal collection is ongoing in anticipation of the upcoming peak season. Natural gas may be utilized for production, if it is deemed cost effective. SEGS VIII and SEGS IX will be out of service for maintenance outages in January.

February

We anticipate firing heaters only for freeze protection during the month of February. This operation is necessary when the temperature of HTF in the system is less than, or equal to, 100° F. The heaters are fired until the HTF system temperature reaches approximately 300° F. The amount of gas budgeted for freeze protection is 1,500 kscf per plant. Solar field thermal collection is ongoing in anticipation of the upcoming peak season. Power generation will be in solar only mode.

<u>March</u>

We anticipate firing heaters only for freeze protection during the month of March. This operation is necessary when the temperature of HTF in the system is less than, or equal to, 100° F. The heaters are fired until the HTF system temperature reaches approximately 300° F. The amount of gas budgeted for freeze protection is 1,000 kscf per plant. Solar field thermal collection is ongoing in anticipation of the upcoming peak season. Power generation will be in solar only mode.

<u>April</u>

We anticipate firing heaters only for freeze protection during the month of March. This operation is necessary when the temperature of HTF in the system is less than, or equal to, 100° F. The heaters are fired until the HTF system temperature reaches approximately 300° F. The amount of gas budgeted for freeze protection is 1,000 kscf per plant. Solar field thermal collection is ongoing in anticipation of the upcoming peak season. Power generation will be in solar only mode

May

We anticipate power generation will be in solar only mode.

<u>June – July – August – September</u>

During the peak season we anticipate power generation will be in solar only mode.

<u>October</u>

We anticipate power generation will be in solar only mode at SEGS IX. We anticipate SEGS VIII to be shut down for repowering.

<u>November</u>

Power generation will be in solar mode only. The heaters may be used at SEGS IX for freeze protection during the month of November. This operation is necessary when the temperature of HTF in the systems is less then, or equal to, 100° F. The heaters are fired until the HTF system temperature reaches approximately 300° F. The amount of gas budgeted for freeze protection is 1,500 kscf. We anticipate SEGS VIII to be shut down for repowering.

<u>December</u>

Power generation will be in solar only mode. The heaters may be used at SEGS IX for freeze protection during the month of December. This operation is necessary when the temperature of HTF in the systems is less then, or equal to, 100° F. The heaters are fired until the HTF system temperature reaches approximately 300° F. The amount of gas budgeted for freeze protection is 1,500 kscf. We anticipate SEGS VIII to be shut down for repowering.

Facility Changes

There were no changes to the facility during the 2020 calendar year.

2020 Elapsed Submittals

To the best of our knowledge all submittal deadlines were met during the 2020 calendar year.

Filings with Other Governmental Agencies

2020 Additional Filings

The following is a summary of the filings made during 2020 with governmental agencies having permitting authority over the SEGS VIII and IX projects.

- All quarterly semi-annual and annual reporting was submitted on schedule in 2020 to the Mojave Desert
 Air Quality Management District, the California Regional Water Quality Control Board-Lahontan Region,
 and the Mojave Basin Area Watermaster.
- All permit renewals and fees were submitted on schedule in 2020, to the San Bernardino County Fire
 Department, the Environmental Health Services, the Environmental Public Works Agency, the Mojave
 Desert Air Quality Management District, the State Board of Equalization, the Lahontan Regional Water
 Quality Control Board, and the San Bernardino County Fire Warden.
- The Emissions Compliance and Monitor Certification Testing Report was submitted to the Mojave Desert Air Quality Management District on schedule in August 2020.

Onsite Compliance File – Additions / Deletions

2020 ANNUAL COMPLIANCE REPORT

SEGS VIII & IX

Lahontan Regional Water Quality Control Board Annual Report

The Second Semi-Annual 2020 Monitoring Report was submitted under separate cover.

Waste Discharge Requirements

The Waste Discharge Requirements were included in the 2000 Annual Compliance Report to the California Energy Commission.

The waste discharge requirements as issued by the Lahontan Regional Water Quality Control Board under Board Order #6-98-74 remain in effect and were unchanged during the 2020 calendar year.

Production Well Data

Depth to Groundwater Measurements

	State			Approximate	Approximate	
Well	Well	Date of	Depth	Surface	Water	
			to	Elevation	Elevation	
			Water			
Number	Number	Measurement	(feet)	(feet msl)	(feet msl)	Comments
P34	11N/4W-	8/28/2020				Out of commission requiring
	19E					overhaul.
P35	11N/4W-	8/28/2020	161.1	2058	1892	
	19E					
P36	11N/4W-	8/28/2020	153.8	2058	1904	
	19Q					
P40	11N/4W-	8/28/2020	134.2	2039	1905	
	19J					

Production Well Pumping Rate

Well Number	State Well Number	Average Well Pumping Rate (gallons per minute)
P34	11N/4W-19E	
P35	11N/4W-19E	539
P36	11N/4W-19Q	741
P40	11N/4W-19J	1103

Production Well Total Annual Extractions

Well Number	State Well Number	Annual Extraction Amount (acre-feet)
P34	11N/4W-19E	2.34
P35	11N/4W-19E	559.65
P36	11N/4W-19Q	9.19
P40	11N/4W-19J	317.24

Condition of Certification – WATER-8

Luz Solar Partners VIII & IX have implemented measures adequate to protect adjacent private property from flooding, scouring, and erosion as a result of the operation of the SEGS Unit VIII and SEGS Unit IX and have fully complied with the SEGS Unit VIII Condition of Certification WATER-8 during the calendar year 2020.

Luz Solar Partners VIII & IX did not perform any road maintenance or other required repairs on adjacent properties in the 2020 calendar year since there were no damages to adjacent properties as a result of flooding, scouring, or erosion.

Decommissioning Fund

Luz Solar Partners VIII & IX have continued to assess the potential regional market for willing purchasers of the Heat Transfer Fluid (HTF) for use as a fuel source.

Luz Solar Partners VIII filed a preliminary decommissioning plan with the CEC in compliance with FS/DC Condition 2.

Proof of Pollution Insurance



CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY) 03/12/2020

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the If SUBROGATION IS WAIVED, subject to the terms and conditions of this certificate does not confer rights to the certificate holder in lieu of s	the policy, certain p	oolicies may				
PRODUCER	CONTACT).				
MCGRIFF, SEIBELS & WILLIAMS, INC.	NAME: PHONE (A/C No Evel, 800-476-2211 (A/C No):					
P.O. Box 10265 Birmingham, AL 35202	PHONE (A/C, No, Ext): 800-476-2211 (A/C, No, Ext): FAX (A/C, No):					
Birmingham, AL 33202	ADDRESS:					
	INS	SURER(S) AFFOR	RDING COVERAGE		NAIC #	
	INSURER A :Hartford F	ire Insurance C	ompany		19682	
INSURED Terra-Gen, LLC including Luz Solar Partners Ltd, VIII &	INSURER B:					
IX .	INSURER C:					
437 Madison Avenue 22nd Floor, Suite A	INSURER D:					
New York, NY 10022	INSURER E:					
	INSURER F:					
COVERAGES CERTIFICATE NUMBER:93MM2EYC			REVISION NUMBER:			
THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW H. INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORI EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE INSP LTR TYPE OF INSURANCE ADDL SUBR LTR TYPE OF INSURANCE RESIDENCE POLICY NUMBER	N OF ANY CONTRACT DED BY THE POLICIE	OR OTHER S DESCRIBE PAID CLAIMS.	DOCUMENT WITH RESPE	CT TO	WHICH THIS	
LTR TYPE OF INSURANCE INSD WVD POLICY NUMBER A X COMMERCIAL GENERAL LIABILITY 21 UEJ JA3519	03/15/2020	03/15/2021	EACH OCCURRENCE	\$	1,000,000	
CLAIMS-MADE X OCCUR			DAMAGE TO RENTED	\$	300,000	
CLAIMS-MADE N OCCOR			PREMISES (Ea occurrence)	\$	10,000	
			MED EXP (Any one person)	\$	1,000,000	
GEN'L AGGREGATE LIMIT APPLIES PER:			PERSONAL & ADV INJURY GENERAL AGGREGATE	· ·	3,000,000	
PRO. CV				\$	3,000,000	
			PRODUCTS - COMP/OP AGG	\$		
OTHER: AUTOMOBILE LIABILITY			COMBINED SINGLE LIMIT	-		
ANY AUTO			(Ea accident) BODILY INJURY (Per person)	\$		
OWNED SCHEDULED			, , , , , , , , , , , , , , , , , , ,	\$		
AUTOS ONLY AUTOS NON-OWNED			BODILY INJURY (Per accident) PROPERTY DAMAGE	-		
AUTOS ONLY AUTOS ONLY			(Per accident)	\$		
L LIMPOTILATION L						
UMBRELLA LIAB OCCUR			EACH OCCURRENCE	\$		
EXCESS LIAB CLAIMS-MADE			AGGREGATE	\$		
DED RETENTION \$ WORKERS COMPENSATION			PER IOTH-	\$		
AND EMPLOYERS' LIABILITY Y/N			PER OTH- STATUTE ER			
ANY PROPRIETOR/PARTNER/EXECUTIVE N/A N/A			E.L. EACH ACCIDENT	\$		
(Mandatory in NH) If yes, describe under			E.L. DISEASE - EA EMPLOYEE	\$		
DÉSCRIPTION OF OPERATIONS below			E.L. DISEASE - POLICY LIMIT	\$		
				\$		
				\$ \$		
				\$		
DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Sched The General Liability policy includes sudden and accidental pollution coverage, and couplect to policy terms, conditions, and exclusions.				written	contract,	
CERTIFICATE HOLDER	CANCELLATION					
	SHOULD ANY OF	THE ABOVE D	ESCRIBED POLICIES BE C EREOF, NOTICE WILL E Y PROVISIONS.			
California Energy Commission Siting, Transmission & Environmental Protection (STEP) Division	AUTHORIZED REPRESENTATIVE					
1516 9th Street, MS-2000 Sacramento, CA 95814	ASTRONIZED REPRESENTATIVE					

Traffic and Transportation Road Monitoring

Conditions of Certification – TRANS-7 (VIII) & TRANS-6 (IX)

Luz Solar Partners VIII & IX has record of no accidents on Harper Lake, Hoffman, and Lockhart Roads, and Santa Fe Avenue during the 2020 calendar year involving SEGS VIII & IX Operations. As a result of this monitoring, no further mitigation measures were proposed by Luz Solar Partners VIII & IX in 2020.