

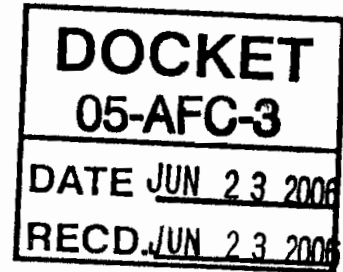
## CALIFORNIA ENERGY COMMISSION

1516 NINTH STREET  
SACRAMENTO, CA 95814-5512  
www.energy.ca.gov



June 23, 2006

Mr. Tom McCabe,  
Regional Vice President-Environmental Health & Safety  
Edison Mission Energy  
18101 Von Karman Ave, Suite 1700  
Irvine, CA 92612-1046



Dear Mr. McCabe,

**SUN VALLEY ENERGY PROJECT (05-AFC-3) DATA REQUESTS**

Pursuant to Title 20, California Code of Regulations, section 1716, the California Energy Commission staff requests that Valle del Sol, LLC, supply the information specified in the enclosed data requests.

The subject area addressed in the enclosed data requests 91 through 93 is Visible Plume Modeling. The information requested is necessary to understand the project, assess whether the project would result in significant environmental effects, and to assess project alternatives and mitigation measures.

Written responses to the enclosed data requests are due to the Energy Commission staff by July 19, 2006, or a later date agreed upon by the Energy Commission staff and the applicant.

If you are unable to provide the information requested in the data requests or object to providing it, you must notify the committee assigned to the project and the project manager within 10 days of receiving these requests, stating your reason for delay or objection.

If you have any questions regarding the enclosed data requests, please call me at (916) 651-8853.

Sincerely,

Robert Worl  
Project Manager

Enclosure

cc:

Proof of Service  
Docket (05-AFC-3)

PROOF OF SERVICE (REVISED 3-3-06) FILED WITH  
ORIGINAL MAILED FROM SACRAMENTO ON 6-23-06

p/s

**Sun Valley Energy Project  
(05-AFC-3)  
Data Requests**

**SUN VALLEY ENERGY PROJECT  
05-AFC-3  
DATA REQUESTS**

**Technical Area: Visible Plume Modeling**

**Author:** William Walters

**BACKGROUND**

Analysis of the cooling tower data provided in the May supplemental response to Data Request 70 indicates that the exhaust temperature and inlet/outlet water temperatures are much higher than for other cooling towers that staff has analyzed over the past four years. Cooling tower "relative" air flow is directly related to the plume potential for that cooling tower. A comparison of the full load "relative" air flow per heat rejection rate for this project and other recent peaker and combined cycle projects is as follows. The lower the relative air flow rate, the higher the plume frequency.

- Sun Valley – 5.5 to 9.0 kg/s/MW
- Los Esteros – 20.4 to 22.0 kg/s/MW
- San Francisco Energy Reliability Project (SFERP) – 19.9 kg/s/MW (minimum)
- Roseville – 13.6 to 16.2 kg/s/MW
- Inland Empire – 28.4 kg/s/MW
- Blythe II – 15.1 to 20.3 kg/s/MW
- Consumnes – 19.1 to 21.8 kg/s/MW

Due to turbine intercoolers and other factors, this project is more comparable to a combined cycle project the size of the Roseville project than to the two simple cycle projects (Los Esteros and SFERP) shown for comparison.

Staff realizes that the cooling application for this project is different than that for a combined cycle project (turbine intercooler vs. heat exchange for steam condensation). However, the variation between the cooling tower data provided for this project and previous siting case cooling tower data requires that we make the following data requests.

**DATA REQUEST**

91. Please confirm the cooling tower data provided in the supplemental data response, or provide corrections to this data as necessary.
92. Please explain the rationale for the low air flow for this cooling tower and describe the technical differences between the cooling for this project and the cooling for combined cycle projects that allow for the higher cooling water temperatures and very low cooling tower air flows.

**Sun Valley Energy Project  
(05-AFC-3)  
Data Requests**

93. Please discuss whether the cooling tower could be redesigned to allow for higher air flow rates (around 15 kg/s/MW), or whether there are other design changes that would effectively reduce the frequency of visible plumes.

BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT COMMISSION  
OF THE STATE OF CALIFORNIA

APPLICATION FOR CERTIFICATION  
FOR THE SUN VALLEY ENERGY  
PROJECT (SVEP)

DOCKET No. 05-AFC-3

(Revised 3/3/2006)

PROOF OF SERVICE LIST

**DOCKET UNIT**

*Send the original signed document plus the required 12 copies to the address below:*

CALIFORNIA ENERGY COMMISSION  
DOCKET UNIT, MS-4  
\*Attn: Docket No. **05-AFC-3**  
1516 Ninth Street  
Sacramento, CA 95814-5512  
E-mail: [docket@energy.state.ca.us](mailto:docket@energy.state.ca.us)

\* \* \* \*

*In addition to the documents sent to the Commission Docket Unit, also send individual copies of any documents to:*

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## **INTERESTED AGENCIES**

None listed as of 3/3/2006

## **INTERVENORS**

California Unions for Reliable Energy  
(CURE)  
C/O Marc D. Joseph  
Gloria D. Smith  
Adams Broadwell Joseph & Cardozo  
601 Gateway Boulevard, Suite 1000  
South San Francisco, California 94080

**\* Romoland School District**  
**Roland Skumawitz, Superintendent**  
**25900 Leon Road**  
**Romoland, California 92548**

## **DECLARATION OF SERVICE**

I, Dora Gomez declare that on June 23, 2006 I deposited copies of the attached Sun Valley Energy Project (05-AFC-3) Data Requests, in the United States mail at Sacramento, CA with first class postage thereon fully prepaid and addressed to those identified on the Proof of Service list above. Transmission via electronic mail was consistent with the requirements of California Code of Regulations, title 20, sections 1209, 1209.5, and 1210.

I declare under penalty of perjury that the foregoing is true and correct.

  
\_\_\_\_\_  
[signature]

\* \* \* \*

## INTERNAL DISTRIBUTION LIST

**FOR YOUR INFORMATION ONLY!** Parties **DO NOT** mail to the following individuals. The Energy Commission Docket Unit will internally distribute documents filed in this case to the following:

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Jackalyne Pfannenstiel  
Vice Chair & Associate Member  
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Hearing Officer  
MS-9

Project Manager  
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Deborah Dyer  
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