



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • www.aqmd.gov

November 9, 2007

Mr. Donal O'Callaghan  
Director of Light & Power  
City of Vernon  
4305 Santa Fe Avenue  
Vernon, CA 90058

<b>DOCKET</b> <b>06-AFC-4</b>	
<b>DATE</b>	NOV 09 2007
<b>RECD.</b>	NOV 28 2007

Dear Mr. O'Callaghan:

South Coast Air Quality management Distinct (AQMD) has received your October 15, 2007 response to the requirements of amended Rule 1309.1 (c)(5)(B) and the letter from Mr. Mohsen Nazemi dated September 14, 2007 concerning renewable energy. For the Vernon Power Project (VPP) you were asked to provide documentation that VPP will comply with the renewable/alternative energy requirements of Rule 1309.1(c)(5)(B). In your above letter you have stated that renewable/alternative energy is not a viable option for the power to be generated at the VPP site.

After reviewing your above letter, AQMD sent you an e-mail, dated October 18, 2007, asking you to provide the detailed analysis about the alternate energy options, such as hydropower, wind power, wave power, solar power, geothermal energy etc. Your response described that those were not viable options for the VPP. Your findings were based on site limitations, proximity to alternate sources of energy, intermittent nature of the renewable energy sources and economics.

Although this may be an appropriate analysis in certain circumstances, AQMD believes that in order to fully address and more importantly ensure compliance with the requirements of Rule 1309.1(c)(5)(B), a more specific analysis is required for all types of renewable/alternative energy technologies, specifically solar, wind and fuel cell technology. AQMD believes that the analysis should be conducted to see if renewable/alternative technology can be used to generate a reasonable amount of power on-site. A reasonable amount of power to be generated would be approximately 10% of total plant generating capacity, or 94 MW. This criterion is based on a power plant located in Victorville in which they are producing 10% of their power on-site through renewable energy technology.

PROOF OF SERVICE (REVISED 10/17/07) FILED WITH  
ORIGINAL MAILED FROM SACRAMENTO ON 11/28/07 CF

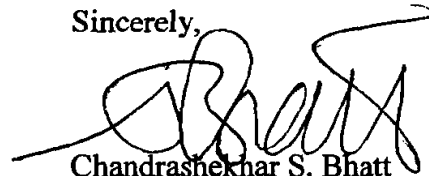
Mr. Donal O'Callaghan

-2-

November 9, 2007

Your detailed analysis shall show all the renewable energy options described above and the analysis shall show why these alternate energy options not feasible for the VPP project. Please provide the detailed criterion used to reach your conclusion. You are requested to provide this detail analysis by November 30, 2007. If you have any questions, please call me. Thank you very much for your continued efforts and patience.

Sincerely,



Chandrashekhhar S. Bhatt  
Air Quality Engineer  
Engineering & Compliance Division

CSB:JTY

CC: VPP File  
✓ James Reede, CEC  
Krishna Nand, City of Vernon

C:/vpp-R-1309.1-compl-renewable-energy-analysis-req.doc

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

**APPLICATION FOR CERTIFICATION  
FOR THE VERNON POWER PLANT PROJECT  
BY THE CITY OF VERNON**

**DOCKET NO. 06-AFC-4  
PROOF OF SERVICE LIST  
(REVISED 10/17/2007)**

**INSTRUCTIONS: All parties shall (1) file a printed, original signed document plus 12 copies OR file one original signed document and e-mail the document to the Docket address below, AND (2) all parties shall also send a printed OR electronic copy of the document, plus a proof of service declaration, to each of the entities and individuals on the proof of service list:**

**CALIFORNIA ENERGY COMMISSION**  
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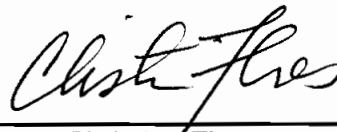
DECLARATION OF SERVICE

I, Christina Flores, deposited copies of the attached Letter from SCAQMD in the United States mail on November 28, 2007, at Sacramento, California with first-class postage thereon fully prepaid and addressed to those identified on the Proof of Service list above.

OR

Transmission via electronic mail was consistent with the requirements of California Code of Regulations, title 20, sections 1209, 1209.5, and 1210. All electronic copies were sent to all those identified on the Proof of Service list above.

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



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Christina Flores