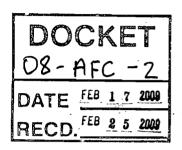
KERN COUNTY AIR POLLUTION CONTROL DISTRICT DAVID L. JONES, APCO



February 17, 2009

Mr. Dale Edwards, Manager Environmental Protection Office Siting, Transmissions and Environmental Protection Division California Energy Commissions 1516 Ninth Street Sacramento, California 95814-5512



SUBJECT: Beacon Solar, Application No.: 0369001–007 - Project No.: 080414

Dear Mr. Edwards:

The Kern County Air Pollution Control District is in receipt of your comments regarding the Preliminary Documents of Compliance (PDOC) for the Beacon Solar Energy Project. In response to your comments the District offers the following statements:

District Staff will ensure page numbers will be included on the Final Document of Compliance (FDOC).

Cooling Tower

District Staff confirms CEC Staff's statement the total dissolved solids (TDS) value of 0.0601-lb/gal, the TDS value of 720-mg/liter and use of a correction factor in the calculation of particulate matter (PM) emissions are incorrect. District staff will correct errors by eliminating use of 720-mg/liter for 1600-mg/liter and 0.0601-lb/gal for 0.01335-lb/gal. Additionally, the correction factor utilized for condition 5 for Cooling Tower PDOC will be eliminated. Calculations utilized to determine potential to emit were based on 0.01335-lb/gal; therefore, calculated emissions need not be corrected.

Conclusion Item C (Rule 402)

CEC staff recognized an error regarding the Source Category and corresponding Control Measure. The Source Category was omitted. The Source Category is Unpaved Roads. The wording will be added to the FDOC.

PROOF OF SERVICE (REVISED <u>2/9/09</u>) FILED WITH DRIGINAL MAILED FROM SACRAMENTO ON 2/25/04 Mr. Dale Edwards, Manager California Energy Commission February 11, 2009 Page 2

Conclusion Item E (Rule 407)

CEC staff recognized an error regarding the sulfur content of natural gas. District staff utilized an emission factor of 0.025 grains per standard cubic foot (gr/scf). CEC staff recommended a sulfur content of 0.25-gr/100-scf. District staff confirmed this concentration with PG&E sulfur reports. Therefore, the maximum sulfur content of natural gas shall be changed to 0.25-gr/100-scf.

Additionally, District staff omitted sulfur emissions from diesel fuel used for the emergency generator. District BACT policy required use of CARB diesel with a sulfur content of 0.0015%. Therefore, the maximum sulfur content of diesel fuel shall be changed to 0.0015%. The above emission factors were utilized in calculating emissions; therefore, these changes are only to the Engineering Analysis and FDOC, and will not result in a change in emissions.

The above changes shall be included in the Engineering Analysis and FDOC, a copy of which will be sent to you upon completion. Thank you, for your comments. Should you have any questions, please telephone Glen Stephens of our office at (661) 862-5250.

Sincerely,

Glen E. Stephens, P.E. Air Quality Engineer III

GES:tf



BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT COMMISSION OF THE STATE OF CALIFORNIA 1516 NINTH STREET, SACRAMENTO, CA 95814 1-800-822-6228 – www.energy.ca.gov

APPLICATION FOR CERTIFICATION For the BEACON SOLAR ENERGY PROJECT Docket No. 08-AFC-2

PROOF OF SERVICE (Revised 2/9/09)

APPLICANT

Scott Busa
Kenneth Stein, J.D.,
Meg Russell
Duane McCloud
Guillermo Narvaez, P.E.
Nextera Energy Resources, LLC
700 Universe Blvd.
Juno Beach, FL 33408
Scott.Busa@Nexteraenergy.com
Kenneth.Stein@Nexteraenergy.com
Meg.Russell@Nexteraenergy.com
Duane.McCloud@Nexteraenergy.com
Guillermo.Narvaez@Nexteraenergy.com

APPLICANT'S CONSULTANTS

Sara Head, Vice President AECOM Environment 1220 Avenida Acaso Camarillo, CA 93012 sara.head@aecom.com

Bill Pietrucha, Project Manager
Jared Foster, P.E.,
Mechanical Engineer
Worley Parsons
2330 E. Bidwell Street, Suite 150
Folsom, CA 95630
Bill.Pietrucha@worleyparsons.com
Jared.Foster@worleyparsons.com

COUNSEL FOR APPLICANT

Jane Luckhardt, Attorney at Law Downey Brand Attorneys LLP 621 Capital Mall, 18th Floor Sacramento, CA 95814 jluckhardt@downeybrand.com

INTERESTED AGENCIES

California ISO e-recipient@caiso.com

<u>INTERVENORS</u>

*Tanya A. Gulesserian
Marc D. Joseph
Adams Broadwell
Joseph & Cardozo
601 Gateway Boulevard,
Suite 1000
South San Francisco, CA 94080
E-MAILED PREFERRED
tgulesserian@adamsbroadwell.com

ENERGY COMMISSION

KAREN DOUGLAS
Chairman and Presiding Member
KLdougla@energy.state.ca.us

JEFFREY D. BYRON Commissioner and Associate Member Jbyron@energy.state.ca.us

Kenneth Celli Hearing Officer kcelli@energy.state.ca.us

Enc K. Solono
Project Manager
esolorio@energy.state.ca.us

Jared Babula Staff Counsel jbabula@energy.state.ca.us

Public Adviser's Office publicadviser@energy.state.ca.us

DECLARATION OF SERVICE

I, <u>Maria Santourdjian</u>, declare that on <u>February 25, 2009</u>, I served and filed copies of the attached <u>Beacon Solar Energy Project (08-AFC-2) KCAPCD Comment Letter, dated <u>February 17, 2009</u>. The original document, filed with the Docket Unit, is accompanied by a copy of the most recent Proof of Service list, located on the web page for this project at:</u>

[www.energy.ca.gov/sitingcases/beacon]. The document has been sent to both the other parties in this proceeding (as shown on the Proof of Service list) and to the Commission's Docket Unit, in the following manner:

(Check all that Apply)

	FOR SERVICE TO ALL OTHER PARTIES:
✓_	_sent electronically to all email addresses on the Proof of Service list;
✓_	by personal delivery or by depositing in the United States mail at <u>Sacramento CA</u> with first-class postage thereon fully prepaid and addressed as provided or the Proof of Service list above to those addresses NOT marked "email preferred."
AND	
	FOR FILING WITH THE ENERGY COMMISSION:
✓	sending an original paper copy and one electronic copy, mailed and emailed respectively, to the address below (<i>preferred method</i>);
OR	
	depositing in the mail an original and 12 paper copies, as follows:

CALIFORNIA ENERGY COMMISSION

Attn: Docket No. <u>08-AFC-4</u> 1516 Ninth Street, MS-4 Sacramento, CA 95814-5512 docket@energy.state.ca.us

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

Maria Santourdiiar