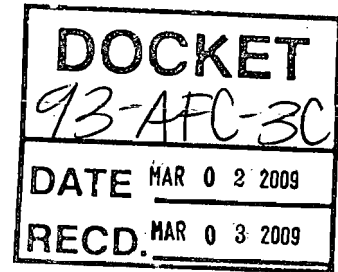


6484 Oakridge Way  
Sacramento, CA 95831-2234

March 2, 2009

Mary Dyas  
Compliance Project Manager  
Compliance Unit  
California Energy Commission  
1516 Ninth Street, MS-2000  
Sacramento, CA 95814



RE: Petition to Amend Campbell Cogeneration Project (93-AFC-3C)

Dear Ms. Dyas,

Please mail the staff analysis of the application to me at the above address as soon as it is available. I have reviewed the documents available today on the internet, which do not yet include the staff analysis.

Meanwhile, here are questions I hope the Commission will consider before acting on the request. You may wish to forward some or all of these questions to the applicant for response to you. Please forward to me copies of any such responses.

Why should “shutdown emissions” not be subject to the hourly emissions limits?

What are “shutdown emissions” and why should they be treated differently from limits on other emissions? What is special or different about the 30 minute period preceding shutting off the fuel to the gas turbine?

Why is it necessary that the CEC language concerning shutdown emissions “harmonize with” the SMAQMD permit, so long as it does not create a conflict affecting operation of the facility? Will there be a compliance difficulty, of any sort, if the shutdown emissions language is NOT amended to be harmonious?

Generally it seems the project is asking CEC never to be more restrictive than the SMAQMD. What is the rationale justifying this? They are two separate authorities with different purposes and constituencies. It should be normal they would impose restrictions which differ in some respects.

How long with the “tuning” or “commissioning” period last, a period during which CO and NOx levels will exceed the current permit limits, according to the summary page of the application? The application estimates this period will take about 11 days, but could it not take longer? I see no limit in the proposed amendment, only “as soon as” time frames.

What are the consequences or penalties, if any, to the applicant if the amounts and duration of emissions associated with the tuning, or commissioning, period exceed the estimates in the application?

When the existing equipment was first installed and operated, was there a similar “tuning” or “commissioning” period, and, if so, how long did that last? And did emissions of CO and NOx similarly exceed limits at that time?

The predicted emissions of CO and NOx displayed in tables 1 and 3 are wildly different – emissions during “tuning” are many multiples larger, whether looking at hourly or daily estimates. Did such a thing happen the first time the plant was put in service? If not, why does simply changing control hardware and software require such huge increases in emissions?

Is there a way of implementing the new control software and hardware which does not require a tuning or commissioning method which is so dirty?

Why is it necessary to tune the system to “allow technicians to operate the plant as they have been trained to do?” Would it be feasible, instead, to retrain existing staff so they know how to operate the new Siemens system in a different way, a way which would not require modeling the new system to “mimic the control dynamics” of the old system? If not, why not?

The application says the tuning or commissioning work, though it will increase emissions during the approximate 11 day period, will not cause quarterly limits to be exceeded. That should be very easy to accomplish if the commissioning period is split over two quarters, around the time one quarter ends and the next quarter begins. Is this what is intended by the applicant?

Sincerely,



Don Enderton