

CALIFORNIA ENERGY COMMISSION

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www.energy.ca.gov



April 28, 2009

DOCKET 08-AFC-6

DATE	APR 28 2009
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RECD.	APR 28 2009
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Jonathan Sacks, Project Director
Mirant Corporation
1155 Perimeter Center West
Atlanta, GA, 30338

**RE: WILLOW PASS GENERATING STATION (08-AFC-6), DATA REQUESTS
SET 2 (#58-75)**

Mr. Sacks:

Pursuant to Title 20, California Code of Regulations, Section 1716, the California Energy Commission staff seeks the information specified in the enclosed data requests. The information requested is necessary to: 1) more fully understand the project; 2) assess whether the facility will be constructed and operated in compliance with applicable regulations; 3) assess whether the project will result in significant environmental impacts; and, 4) assess potential mitigation measures.

This set of data requests (#58-75) are being made in the areas of Biological Resources, Socioeconomics, Soil and Water Resources, Transmission System Engineering (TSE) and Waste Management. Written responses to the enclosed data requests are due to the Energy Commission staff on or before May 28, 2009, or at such later date as may be mutually agreeable. The information sought through these data request questions is not necessary for staff to complete its Preliminary Staff Assessment (PSA). However, as your staff knows, the answers to the following questions are necessary in order for staff to complete its Final Staff Assessment (FSA), and are asked accordingly.

These data requests are asked for good cause and to formalize the process. The TSE questions were either posed initially in Data Requests Set 1, or are being issued now -- despite an expired 180-day discovery window -- because of recent filings that occurred since Data Adequacy (i.e., the February, 2009 System Impact Study). Likewise, the Biological Resources question is issued -- despite the 180-day expiration -- because of outside agency involvement (US Fish & Wildlife Service interest in potential nitrogen deposition impacts, if any, on sensitive species in the Antioch Dunes National Wildlife Refuge).

If you are unable to provide the information requested, need additional time, or object to providing the requested information, you must send a written notice to both the Committee and me within 20 days of receipt of this notice. The notification must contain the reasons for not providing the information, the need for additional time, and the grounds for any objections (see Title 20, California Code of Regulations, Sec.1716 (f)). If you have any questions, please call me at (916) 654-4640 or email me at fmiller@energy.state.ca.us.

Sincerely,

Original signed by
Felicia Miller
Project Manager

PROOF OF SERVICE (REVISED 04/14/09) FILED WITH
ORIGINAL MAILED FROM SACRAMENTO ON 04/28/09

AA

Technical Area: Biological Resources

Author: Heather Blair

BACKGROUND

Emissions from the proposed Willow Pass Generating Station (WPGS), namely nitrogen oxides (NO_x) and ammonia (NH₃), would result in nitrogen deposition from the atmosphere to the biosphere. Excessive nitrogen deposition can act as a fertilizer and promote the growth of non-native vegetation. The increased dominance and growth of invasive annual grasses is especially prevalent in low-biomass vegetation communities that are naturally nitrogen-limited, such as sand dunes. The Antioch Dunes National Wildlife Refuge (NWR), which is approximately five miles east of the WPGS site, comprises 67 acres of sand dunes that support the last known natural populations of the federally endangered Lange's metalmark butterfly, federally and state-endangered Antioch Dunes evening primrose, and federally and state-endangered Contra Costa wallflower. Major threats to these species include invasion of non-native vegetation and wildfire, which is exacerbated by the presence of non-native vegetation. Antioch Dunes evening primrose, Contra Costa wallflower, and naked buckwheat, the larval host plant of Lange's metalmark butterfly, require open sandy substrate for survival. Invasive non-native vegetation, which is enhanced by atmospheric nitrogen deposition, affects these species by outcompeting them for space, sunlight, moisture, and nutrients.

Nitrogen deposition and the resultant potential impacts to state and federally listed species at the Antioch Dunes NWR, is of concern to the Energy Commission staff, United States Fish and Wildlife Service (USFWS), and California Department of Fish and Game (CDFG). To assess impacts to nitrogen-sensitive biological resources, staff requires additional information on nitrogen deposition resulting from WPGS emissions.

DATA REQUESTS

58. Please quantify the existing baseline total nitrogen deposition rate in the vicinity of WPGS (encompassing the areas listed in DR #2) in kilograms per hectare per year (kg/ha/yr). Provide the complete citation for references used in determining this number.
59. Please provide an analysis of impacts due to total nitrogen deposition from operation of the WPGS. The analysis should specify the amount of total nitrogen deposition in kg/ha/yr at the Sardis Unit and Stamms Unit of the Antioch Dunes National Wildlife Refuge, the freshwater/brackish marsh habitat immediately west of the project area, and all other "Areas of Concern" (A through O) as illustrated in AFC Figure 7.2-1.
60. Please provide an isopleth graphic over USGS 7.5-minute maps (or equally detailed map) of the direct nitrogen deposition rates caused by the project that graphically depicts the results.

Willow Pass Generating Station
(08-AFC-06)
Data Requests Set 2

61. Please update the cumulative impact analysis (Tables 57-1 and 57-2) in Responses to Data Request Addendum Set #1A – Data Request #57 with nitrogen deposition values in kg/ha/yr. Provide an isopleth graphic over USGS 7.5-minute maps (or equally detailed map) of the direct nitrogen deposition values in the cumulative analysis.

Technical Area: Socioeconomics

Author: Marie McLean

BACKGROUND

Section 7.8.2.5, "Fiscal Impacts," subsection "Property Taxes," applicant states: ". . . it is estimated that the project would generate approximately \$25,000 in tax annually (8.25 percent sales tax on \$300,000 worth of locally produced materials) during the first year of operation.

DATA REQUEST

62. Please estimate the sales tax for each year of the plant's operation.

BACKGROUND

Applicant states in "Sales and Use Taxes," page 7.8-16, that Contra Coast County would receive a portion of use tax revenue from materials purchased outside of Contra Costa County. The applicant also states that \$445 million in construction materials are to be purchased in the United States and would be subject to use tax.

DATA REQUEST

63. Please estimate the amount of use tax to be paid by the applicant for (1) the construction phase; and (2) each year of the plant's operation.

Technical Area: Soil and Water Resources

Author: Richard Latteri

BACKGROUND

The WPGS site is located in a special flood hazard area with a Base Flood Elevation (BFE) of 7.0 feet above mean sea level (amsl). The applicant proposes to elevate the WPGS site to approximately 8 to 13 feet amsl. To minimize the potential impacts to water and soil resources from site elevation activities and construction of the WPGS, the California Energy Commission will require a Drainage, Erosion, and Sediment Control Plan (DESCP) as a condition of certification.

DATA REQUEST

64. Please provide a draft DESCP containing elements A through I that describe the site and supports the selection of all erosion and sediment control best management practices (BMPs) that are to be implemented during site mobilization, site elevation, and WPGS foundation and recycled pipeline installation activities. The level of detail in the draft DESCP should be commensurate with the current level of planning for site mobilization, elevation, foundation excavation, and recycled water and return pipeline installation.
- A. Vicinity Map** – Provided map(s) at a minimum scale 1"=100' indicating the location of all project elements (project site, lay down areas, transmission corridors, and pipeline corridors) with depictions of all significant geographic features including swales, storm drains, and sensitive areas.
 - B. Site Delineation** –All WPGS construction areas subject to soil disturbance (project site, lay down areas, recycled water pipeline) shall be delineated showing boundary lines of all construction areas and the location of all existing and proposed structures, pipelines, roads, and drainage facilities.
 - C. Watercourses and Critical Areas** – The draft DESCP shall contain water pollution control drawings (WPCD) at a minimum scale of 1"=100' showing the location of all nearby watercourses including swales, storm drains, and drainage ditches. On the WPCDs Indicate the proximity of those features to the project construction, lay down, and pipeline construction corridor.
 - D. Drainage Map** – The draft DESCP shall provide a topographic site map(s) at a minimum scale 1"=100' showing existing, interim and proposed drainage systems and drainage area boundaries. On the map(s), spot elevations are required where relatively flat conditions exist. The spot elevations and contours shall be extended from the project site a minimum distance of 100 feet in flat terrain.
 - E. Drainage Narrative** – The draft DESCP shall include a narrative of the storm water control measures to be implemented to protect the site and downstream facilities. The narrative shall state the watershed size in acres that is used to

calculate storm water flows and volume. The narrative is to include the summary pages from the hydrology and hydraulic analyses to support the selection of BMPs and structural controls to divert on-site drainage around or through the project construction and laydown areas.

- F. Clearing and Grading Plans** – The draft DESCPC shall provide a delineation of the proposed recycled water and brine return pipeline indicating all areas to be cleared of vegetation and areas to be preserved. The draft DESCPC shall provide elevations, slopes, locations, and extent of all proposed grading as shown by contours, cross sections or other means. The locations of all soil stockpile areas, fills, or other special features will also be shown. Illustrate existing and proposed topography tying in proposed contours with existing topography.
- G. Clearing and Grading Narrative** – The draft DESCPC shall include a mass balance diagram showing the volume of soil that is to be cut and filled to bring the site to its design elevation and a discussion of the types of soil to be used, the placement method, and the location of the borrow site where the fill will be obtained.
- H. Best Management Practices Plan** – The draft DESCPC shall identify on the WPCDs the location of the BMPs to be employed during site mobilization, site elevation, and the foundation and pipeline installation phases of WPGS construction. BMPs shall include measures designed to prevent wind and water erosion in areas with existing soil contamination. Treatment control BMPs used during construction should enable testing of storm water runoff prior to discharge to the San Joaquin River.
- I. Best Management Practices Narrative** – On the WPCDs, the location (as identified in H above), timing, and maintenance schedule of all erosion and sediment control BMPs to be used during the site mobilization, site elevation, and foundation and pipeline installation phases are to be shown.

BACKGROUND

The current understanding of the climate processes includes the expectation that California's mean temperature will rise from 2 to 6 degree C within the century. A sea level rise of up to 55-inches is expected and shoreline development along the Suisun Bay must plan for a revised Base Flood Elevation (BFE) of up to 10 feet amsl or higher.

DATA REQUEST

- 65. In the event that the FEMA designated 100-year BFE rises above 7.0 feet amsl, please provide a discussion of the methods to be employed to keep the WPGS site from flooding.

Technical Area: Transmission System Engineering
Author: Ajoy Guha, P. E. and Mark Hesters

INTRODUCTION

Staff needs to determine the system reliability impacts of the project interconnection and to identify the interconnection facilities including downstream facilities needed to support the reliable interconnection of the proposed Willow Pass Generating Station (WPGS) project. The interconnection must comply with the Utility Reliability and Planning Criteria, North American Electric Reliability Council (NERC) Planning Standards, NERC/Western Electricity Coordinating Council (WECC) Planning Standards, and California Independent System Operator (California ISO) Planning Standards. In addition the California Environmental Quality Act (CEQA) requires the identification and description of the “Direct and indirect significant effects of the project on the environment.” For the compliance with planning and reliability standards and the identification of indirect or downstream transmission impacts, Energy Commission staff normally relies on the System Impact study (SIS) and Facilities study (FS) performed by interconnecting authority, California ISO or the interconnecting utility (in this case PG&E). The California ISO’s generator interconnection process is transitioning from a queue or serial study process to a cluster window process and this transition has caused significant delays in the interconnection studies for many projects. The Energy Commission made the decision to allow applicants to file “third party” or non-California ISO or utility studies during the California ISO’s transition period in order to allow the Application for Certification process to continue throughout the California ISO’s transition. The third party SIS must be sufficient for the Energy Commission to determine whether or not a proposed project interconnection would comply with reliability LORS and in order to identify any additional or downstream facilities that might be required to ensure compliance with CEQA. When the studies determine that the project will cause the transmission to violate reliability requirements the potential mitigation or upgrades required to bring the system into compliance are identified. The mitigation measures often include modification and construction of downstream transmission facilities. The CEQA requires environmental analysis of any downstream facilities for potential indirect impacts of the proposed project.

BACKGROUND

The February, 2009 updated SIS summary report did not list all major assumptions used in the 2013 summer peak base case. The SIS report also did not identify the reliability planning criteria utilized to determine reliability criteria violations.

DATA REQUESTS

66. Provide tables listing all major study assumptions used in the 2013 summer peak base case including major path flows (paths 66, 65, 26 & 15), Energy Commission certified generation projects (pending for construction), California ISO queue generation projects with the Large Generator Interconnection Procedures (LGIP) agreement (thermal and wind), a few major PG&E generation and PG&E total system load.

67. For each analysis performed (power flow overloading and voltage criteria, short circuit, reactive power deficiency, post-transient voltage analysis), identify the reliability planning criteria used to determine reliable criteria violations.

BACKGROUND

In the updated SIS the reactive power deficiency analysis was incomplete and the post-transient voltage analysis was not performed. The transient stability analysis report does not include necessary information for staff's analysis as follows:

- A. Switching files (*.swt) for the contingencies studied showing name of the faulted bus, type of fault, clearing time in cycles of the contingency etc.
- B. Dynamic stability plot diagrams are too small and indistinct to be legible. Also the vertical axis scales of voltage, frequency etc. monitored quantities in a plot diagram are not adequately shown, thereby making it too hard to read and distinguish between several monitored quantities in a diagram.

For the new overload identified on the Dumberton-Newark 115 kV line for category B (L-1 & G-1) contingency, the SIS report indicates that the WPGS is not responsible. But the report did not include any valid reasons.

In the power flow analysis summary results, transmission lines with identified new overloads were listed only. But transmission lines or elements (on which new overloads were identified) with worst pre and post-project contingency (Category B & C) overloads were not listed in the summary results.

All submitted power flow diagrams are not at all clear and legible, this is probably a problem associated with small text and a translation from color to black and white.

DATA REQUESTS

68. A partial list of contingencies derived from the list of the contingencies studied in the transient stability analysis (Appendix 10 of the SIS, Attachment A) is attached herewith as Attachment I. For the contingencies listed in Attachment I, please submit the following for post-project transient stability analysis:
- A. Copies of switching file (*.swt) for each contingency simulation showing name of the faulted bus, type of fault, clearing time in cycles of the contingency etc.
 - B. Larger and distinct dynamic plot diagrams with adequately marked legends and vertical axis scales for the monitored quantities (this is only for the contingencies listed in Attachment I). Printing one per page and using symbols instead of colors will make these easier to read.

69. Provide the following analyses for the addition of the proposed WPGS 550 MW power output by using the 2013 summer peak case:
- A. Adequate reactive power deficiency analysis with output of pre and post-project MVAR data at a few monitored buses (500 and 230 kV) for a few critical 230 and 500 kV category B & C critical contingencies. Provide the list of contingencies studied.
 - B. Post-transient voltage analysis with governor power flow with pre and post-project voltages output monitored at a few critical buses (may be 2-4 buses) for a few selected critical single and double contingencies (may be the same contingencies as listed in Attachment A). Provide the list of contingencies.
 - C. Provide the study results of each analysis in a Table format with pre and post-project data. Provide a mitigation plan for any criteria violation.
70. For the new overload identified on the Dumberton-Newark 115 kV line for category B (L-1 & G-1) contingency, explain the conclusion, "This is an existing problem and is unrelated to the addition of the WPGS project". Provide any identified pre-project overload on this line exacerbated for the addition of the WPGS. Otherwise provide a mitigation plan for the overload.
71. Provide a table in the summary results showing a few worst contingency pre and post-project overloaded transmission elements, on which new post-project overloads (without any pre-project overloads) were also identified for other contingencies in the SIS summer results. List the overloaded element, its emergency ampere rating as well as the contingencies (Category B & C), and pre and post-project loadings.
72. Since the submitted power flow diagrams are not legible, provide clear and legible power flow diagrams (units in MW, percentage loading and per unit voltage) for the following, these should be 11x17 and in color:
- A. Diagrams for the pre and post-project 2013 summer peak study base cases.
 - B. Pre and post-project diagrams for all identified new overloads (not pre-project) or voltage criteria violations under normal system (N-0) or Category B & C contingency conditions.
 - C. Diagrams for a few identified pre and post-project worst overloads exacerbated by the addition of the WPGS (submit worst ones only as requested in Item 5 above).
 - D. The MW flows, percentage loadings and bus voltages along with the bus names must be clearly legible.

ATTACHMENT I PARTIAL LIST OF CONTINGENCIES STUDIED

B-101 N-1 TABLE MT-VACA-DIX 500kV LINE
B-102 N-1 TABLE MT-TESLA 500kV LINE
B-103 N-1 VACA-DIX-TESLA 500kV LINE
B-107 N-1 TESLA-METCALF 500kV LINE
B-108 N-1 TESLA-LOSBANOS 500kV LINE

B-132 N-1 CONTRA COSTA - MORAGA 230kV #1 LINE
B-134 N-1 C.COSTA - BRENTWOOD 230kV LINE
B-137 N-1 LONETREE-C.COSTA 230kV LINE
B-139 N-1 PITTSBURG - DEC PITTSBURG #1 230kV LINE
B-145 N-1 PITTSBURG - EAST SHORE 230kV LINE
B-146 N-1 PITTSBURG - TESLA C 230kV #1 LINE
B-148 N-1 PITTSBURG - SAN MATEO 230kV LINE
B-154 N-1 PITTSBURG - POTRERO D.C. LINE

B-403 T-1 VACA DIXION 500/230kV #11 XFMR BANK
B-404 T-1 VACA DIXION 500/230kV #12 XFMR BANK
B-405 T-1 TESLA 500/230kV #2 XFMR BANK

B-498 G-1 DEC PLANT
B-502 G-1 LMEC PLANT
B-511 G-1 CONTRA COSTA #6
B-513 G-1 PITTSBURG #5
B-515 G-1 PITTSBURG #7

B-996 G-1 WILLOW PASS PLANT

C-111 N-2 COCO - BIRDS LANDING & CONTRA COSTA SUB - BIRDS LANDING 230kV LINES
C-112 N-2 CONTRA COSTA SUB - COCO & BIRDS LANDING - CONTRA COSTA SUB 230kV LINES
C-113 N-2 C.COSTA - MORAGA 230kV #1 & #2 LINES
C-118 N-2 PITTSBURG - SANMATEO & PITTSBURG - EAST SHORE 230kV LINES
C-119 N-2 PITTSBURG - TESLA #1 & #2 230kV LINES
C-210 B-1 CONTRA COSTA SUB 230kV BUS SECTION 1 OUTAGE
C-211 B-1 CONTRA COSTA SUB 230kV BUS SECTION 2 OUTAGE
C-219 B-1 PITTSBURG 230kV BUS SECTION 1 D OUTAGE
C-220 B-1 PITTSBURG 230kV BUS SECTION 2 D OUTAGE
C-221 B-1 PITTSBURG 230kV BUS SECTION 1 E OUTAGE
C-222 B-1 PITTSBURG 230kV BUS SECTION 2 E OUTAGE

Technical Area: Waste Management
Author: Alvin Greenberg, Ph.D.

BACKGROUND

A Phase I Environmental Site Assessment (ESA) has been performed for the Willow Pass site. AFC pgs 7.13-1, -2 and -3 state that nine areas of the site contain Recognized Environmental Conditions (RECs). A Phase II ESA was conducted in 1998 by Fluor Daniel and showed that volatile organic chemicals, including 1,1,1-TCA and TCE, exist in soil and groundwater. Upon review of this data, both Energy Commission staff and DTSC agree that the presence of these VOCs warrant the collection and analysis of soil vapor samples. Furthermore, the 1998 Health Risk Assessment (HRA) is out-dated and inaccurate and cannot be used as a basis for determining site cleanup strategies, goals, or impacts to on-site receptors. Staff needs the results of soil vapor sampling and a revised HRA in order to properly assess the impacts on worker health posed by hazardous wastes present on this site.

DATA REQUESTS

73. Please provide the results of soil vapor sampling at the site. Follow all DTSC guidance when collecting and analyzing samples and submit a workplan to the CEC prior to commencing sampling.
74. Please provide a revised HRA that includes the following:
 - A. all COCs found on the WPGS above the Method Detection Limit unless present in <5% of the WPGS site samples analyzed;
 - B. use the UCL as suggested by the U.S. EPA ProUCL program as the exposure point concentration for each COC;
 - C. all appropriate exposure pathways;
 - D. only soil, groundwater, and soil gas data obtained from locations on the WPGS site itself; and
 - E. risks and hazards posed to the following receptors:
 - the trenching and excavation worker during construction,
 - other construction workers,
 - the off-site public during construction,
 - the on-site worker during operations,
 - the off-site worker during operations, and
 - the off-site public during operations.

BACKGROUND

The Phase II ESA shows there is a plume of VOC contaminated groundwater that extends within approximately 650 feet of Suisun Bay. The groundwater in this area moves north towards the Bay and is influenced by tidal action in Suisun Bay.

DATA REQUEST

75. Please provide an Ecological Risk Screening Assessment using site-specific groundwater concentrations compared to SFBRWQCB ESLs (May 2008 Table F-1b. Groundwater Screening Levels: groundwater is not a current or potential drinking water resource).



**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 WILLOW PASS
GENERATING STATION**

Docket No. 08-AFC-6

**PROOF OF SERVICE
(Revised 4/14/2009)**

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DECLARATION OF SERVICE

I, April Albright, declare that on April 28, 2009, I served and filed copies of the attached Willow Pass Generating Station (08-AFC-6), Data Requests Set 2 (#58-75), dated April 28, 2009. 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: **[<http://www.energy.ca.gov/sitingcases/willowpass/index.html>]**. 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 Sacramento, CA with first-class postage thereon fully prepaid and addressed as provided on 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 (**preferred method**);

OR

depositing in the mail an original and 12 paper copies, as follows:

CALIFORNIA ENERGY COMMISSION

Attn: Docket No. 08-AFC-6
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.

Original signed by _____
April Albright