



High Desert Power Project, LLC

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DOCKET

97-AFC-1C

DATE OCT 18 2011

RECD. OCT 19 2011

October 18, 2011

Ms. Felicia Miller, Compliance Project Manager
California Energy Commission
1516 9th Street, MS-15
Sacramento, CA 95814

Via Overnight Courier

SUBJECT: High Desert Power Project (97-AFC-1C)
Applicant's Comments on Staff Analysis of Proposed Modifications to
Extend Date of Recycled Water Feasibility Study

Dear Ms. Miller:

High Desert Power Project, LLC (the "Applicant") appreciates the opportunity to provide comments on the Staff Analysis of Proposed Modifications to Extend Date of Recycled Water Feasibility Study for the High Desert Project (the "Project").

The Applicant is currently conducting a study to evaluate the feasibility of using up to 100 percent recycled water for the Project's evaporative cooling and industrial uses pursuant to Order No. 09-1118-5 dated November 18, 2009. The Applicant's requested amendment to this Order was quite simple: extend the date for the filing of the feasibility study report to December 31, 2013. The extension of time reflects the unanticipated delay in the delivery of recycled water, which was beyond the control of both the Applicant and the Staff.

The Applicant has requested, and still prefers, that the feasibility study report due date be extended to December 31, 2013. However, the Staff has proposed extending the due date to September 30, 2013. Extending the due date to December 31, 2013 as requested would allow for the collection and analysis of data from two full summer operating seasons (2012 and 2013), testing use of reclaimed water under various operating scenarios. The seasonality is a critical component of the feasibility analysis given that water quality and quantity can vary from season to season.

The Applicant continues to prefer a delivery date of December 31, 2013 for the reasons cited above. Nevertheless, given Staff's recommendation for a September 30, 2013 due date, and given that the current due date of December 31, 2011 would not allow for completion of any meaningful study, the Applicant seeks to avoid further delay of this amendment's approval and wishes to restate for the record its preference for December 31, 2013.

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Thank you for your time and consideration.

Sincerely,

HIGH DESERT POWER TRUST,

a Delaware statutory business trust

By: High Desert Power Project, LLC
a California limited liability company, as agent
for the High Desert Power Trust under that certain
Amended and Restated Project Supervisory Agreement
dated as of April 30, 2001



By: M. Fred Strauss, P.G.
Director, Environmental Programs