

CALIFORNIA ENERGY COMMISSION

1516 NINTH STREET
SACRAMENTO, CA 95814-5512



January 17, 2012

DOCKET

11-AFC-2

DATE JAN 17 2012

RECD. JAN 17 2012

Clay Jensen, Senior Director
BrightSource Energy, Inc.
1999 Harrison Street, Ste. 2150
Oakland, CA 94612

RE: HIDDEN HILLS SOLAR ELECTRIC GENERATING SYSTEM (11-AFC-2), DATA REQUESTS, SET 2B (#'s 144-146)

Mr. Jensen:

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, and 3) assess whether the project will result in significant environmental impacts.

This set of data requests (Set 2b, #'s 144-146) is being made in the area of Air Quality. Written responses to the enclosed data requests are due to the Energy Commission staff on or before February 17, 2012. Please Note that these Data Requests are properly numbered (#'s 144-146), and replace the numbering of those filed on January 13, 2012, which incorrectly indicated numbers 143-145.

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) 654-4894 or email me at mike.monasmith@energy.state.ca.us.

Sincerely,

Mike Monasmith
Project Manager

cc: Docket (11-AFC-2)
Proof of Service List

PROOF OF SERVICE (REVISED 12/22/11) FILED WITH
ORIGINAL MAILED FROM SACRAMENTO ON 1/17/12
EKS

Technical Area: Air Quality**Author:** Jacquelyn Leyva**BACKGROUND: COMMISSIONING IMPACTS ANALYSIS**

Applicant expects the maximum emissions from each boiler to occur during the cold start/tuning phase of commissioning, and during other cold startups. While applicant did not model the impact due to commissioning, when comparing the emissions during commissioning (Table 5.1B-18) and those during cold startups (Table 5.1-24 and Table 5.1-25), staff found maximum emissions during different commissioning phases can be higher than those during cold startups. For example, emissions from auxiliary boilers during the full load operation of commissioning are higher than those during cold startups except for NO_x which shows as being equivalent.

DATA REQUESTS

- 144. Please explain why modeling is not necessary for commissioning while some of the emissions are higher than those during cold startups.
- 145. Please provide additional results for commissioning impact analysis if impact during commissioning is higher than that during cold startups.

BACKGROUND: OPERATIONS EMISSIONS CALCULATIONS

Applicant does not include the emissions from mirror washing activities in the total project emissions in Table 5.1-26. Applicant does not include the mirror washing emissions in the operations impact analysis either. Applicant does quantify the emissions from mirror washing activities in Table 5.1-27 and these emissions are not negligible. For example, the annual NO_x emission from mirror washing activities is expected to be 13.7 tons/yr, while it is 12.3 tons/yr from all stationary sources.

DATA REQUEST

- 146. Please include the emissions from mirror washing activities in the total facility emissions and provide the corresponding impact analysis.



**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 *HIDDEN HILLS SOLAR ELECTRIC
GENERATING SYSTEM***

DOCKET NO. 11-AFC-2

PROOF OF SERVICE
(Revised 12/22/2011)

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DECLARATION OF SERVICE

I, Elizabeth Stewart, declare that on, January 17, 2012, I served and filed copies of the attached Data Requests, Set 2 B (144-146), dated January 17, 2012. This document is accompanied by the most recent Proof of Service list, located on the web page for this project at: [www.energy.ca.gov/sitingcases/hiddenhills/index.html].

The document has been sent to the other parties in this proceeding (as shown on the Proof of Service list) and to the Commission's Docket Unit or Chief Counsel, as appropriate, in the following manner:

(Check all that Apply)

For service to all other parties:

- X Served electronically to all e-mail addresses on the Proof of Service list;
- X Served by delivering on this date, either personally, or for mailing with the U.S. Postal Service with first-class postage thereon fully prepaid, to the name and address of the person served, for mailing that same day in the ordinary course of business; that the envelope was sealed and placed for collection and mailing on that date to those addresses **NOT** marked "e-mail preferred."

AND

For filing with the Docket Unit at the Energy Commission:

- X by sending an electronic copy to the e-mail address below (preferred method); **OR**
- by depositing an original and 12 paper copies in the mail with the U.S. Postal Service with first class postage thereon fully prepaid, as follows:

CALIFORNIA ENERGY COMMISSION – DOCKET UNIT

Attn: Docket No. 11-AFC-2
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512
docket@energy.state.ca.us

OR, if filing a Petition for Reconsideration of Decision or Order pursuant to Title 20, § 1720:

- Served by delivering on this date one electronic copy by e-mail, and an original paper copy to the Chief Counsel at the following address, either personally, or for mailing with the U.S. Postal Service with first class postage thereon fully prepaid:

California Energy Commission
Michael J. Levy, Chief Counsel
1516 Ninth Street MS-14
Sacramento, CA 95814
mlevy@energy.state.ca.us

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, that I am employed in the county where this mailing occurred, and that I am over the age of 18 years and not a party to the proceeding.

Originally Signed by
Elizabeth Stewart