



TETRA TECH EC, INC.

California Energy Commission

DOCKETED

11-AFC-3

TN # 68286

OCT 31 2012

October 31, 2012

Eric Solorio, Project Manager
California Energy Commission
Docket No. 11-AFC-3
1516 9th St.
Sacramento, CA 95814

**Cogentrix Quail Brush Generation Project - Docket Number 11-AFC-03:
Alternatives Analysis October 31, 2012, Errata**

Docket Clerk:

Pursuant to the provisions of Title 20, California Code of Regulations, and on behalf of Quail Brush Genco, LLC, a wholly owned subsidiary of Cogentrix Energy, LLC, Tetra Tech hereby submits the *Alternatives Analysis October 31, 2012, Errata*. The *Alternatives Analysis* is dated October 30, 2012 and was received by docket this morning. The Quail Brush Generation Project is a 100 megawatt natural gas fired electric generation peaking facility to be located in the City of San Diego, California.

The topics addressed in this letter include the following:

- Alternatives

If you have any questions regarding this submittal, please contact Rick Neff at (704) 525-3800 or me at (303) 980-3653.

Sincerely,

A handwritten signature in blue ink that reads "Constance E. Farmer".

Constance E. Farmer
Project Manager/Tetra Tech

cc: Lori Ziebart, Cogentrix
John Collins, Cogentrix
Rick Neff, Cogentrix
Proof of Service List

TETRA TECH EC, INC.



**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
QUAIL BRUSH GENERATION PROJECT***

**DOCKET NO. 11-AFC-03
PROOF OF SERVICE
(Revised 10/29/2012)**

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DECLARATION OF SERVICE

I, Constance Farmer, declare that on October 31, 2012, I served and filed copies of the attached Alternatives Analysis October 31, 2012, Errata, dated October 31, 2012. This document is accompanied by the most recent Proof of Service list, located on the web page for this project at: <http://www.energy.ca.gov/sitingcases/quailbrush/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:

- Served electronically to all e-mail addresses on the Proof of Service list;
- 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 marked **"hard copy required"** or where no e-mail address is provided.

AND

For filing with the Docket Unit at the Energy Commission:

- 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-03
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512
docket@energy.ca.gov

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
michael.levy@energy.ca.gov

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.

Constance C. Farmer

Cogentrix Quail Brush Generation Project - Docket Number 11-AFC-03: Alternatives Analysis, October 31, 2012, Errata

The text in the paragraphs below identifies errata contained in the *Alternatives Analysis* docketed with the CEC on October 31, 2012. These changes supersede the information provided in the complete document. Deleted text is indicated by ~~strike through~~ and added text is indicated by underline.

Page 1-13, Paragraph 4:

1.5.1.1 Topography/Engineering Constraints

AFC Alternative A would require a longer gas lateral than the proposed Project and would require construction of a new access road to the site. AFC Alternative A would require construction of a separate SDG&E utility switchyard; the SDG&E utility switchyard for the proposed Project would be co-located with the power plant site, if enough land is available. AFC Alternative A would require a shorter gen tie than the proposed Project. AFC Alternative A would require significantly more grading (in quantity and complexity) than the proposed Project.

Page 1-17, Paragraph 1 - Bullets 3 and 5, and Paragraph 3:

4.5.1.4 1.5.1.9 Project Objectives

- A power plant ~~could~~ may be constructed on Alternative A site (if enough of the site is usable for construction) which could provide quick start capabilities to support the incorporation of intermittent renewable energy resources into SDG&E's portfolio to enable SDG&E to achieve its 33% by 2020 Renewable Portfolio Standard obligations.
- Alternative A is owned by ~~Sycamore Landfill~~ the County of San Diego and under a long-term lease to Sycamore Landfill and ~~may be~~ not available for development in a reasonable timeframe.

~~1.5.1.2~~ 1.5.1.10 Conclusion

AFC Alternative A is not a feasible alternative as it is not likely to be available for development in the near term. ~~would meet most of the project objectives.~~ Alternative A would result in increased engineering and construction costs as compared to the proposed Project.

Page 1-21, Paragraph 1:

1.5.2.10 Conclusion

AFC Alternative B is not a feasible alternative as it is not likely to be available for development in the near term. ~~Although the site~~ AFC Alternative B would result in increased engineering and construction costs as compared to the proposed Project. AFC Alternative B would have greater visual impacts and potentially greater biological and cultural impacts. It is assumed, however,

that all potentially significant impacts could be reduced to a less than significant level through implementation of the mitigation measures in the AFC.

Page 1-24, Paragraph 3:

1.5.3.10 Conclusion

AFC Alternative C would have greater visual impacts as than the proposed Project. However, it is expected that ~~and all the~~ impacts would be less than significant with mitigation. Therefore, although AFC Alternative C may be feasible, it would not reduce any environmental impacts as compared to the proposed Project.

Page 1-30, Paragraph 6:

1.5.5.10 Conclusion

Alternative Site 2 would not meet most of the project objectives because it would require the construction of additional infrastructure. Alternative Site 2 would have similar topographic constraints as the proposed Project, but engineering constraints would be higher. Environmental impacts would be generally similar to the proposed Project, although the site would result in increased construction costs and impacts related to cultural resources. Engineering constraints would result in higher construction costs. The environmental impacts would likely be mitigable. ~~This site does not support the Project objectives because it would require a different POI that would result in an approximate 3-year delay in the schedule and increased costs associated with the CAISO studies that would be required to determine a new POI for the Project.~~