



TETRA TECH EC, INC.

California Energy Commission

**DOCKETED**

**11-AFC-3**

TN # 68569

NOV. 19 2012

November 19, 2012

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

**Cogentrix Quail Brush Generation Project - Docket Number 11-AFC-3, Initial Response to Dorian Houser's Intervenor Data Requests, 36 through 40**

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 Initial Response to Dorian Houser's Intervenor Data Requests, 36 through 40 (11-AFC-3). 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.

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

Sincerely,

Constance E. Farmer  
Project Manager/Tetra Tech

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



**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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Melanie Kush  
Director of Planning  
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DECLARATION OF SERVICE

I, Constance Farmer, declare that on November 19, 2012, I served and filed copies of the attached Initial Response to Dorian Houser's Intervenor Data Requests, 36 through 40, dated November 19, 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](mailto: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](mailto: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 proceeding.





# Quail Brush Genco, LLC

A Project Company of Cogentrix Energy, LLC

9405 Arrowpoint Boulevard  
Charlotte, North Carolina 28273-8110  
(704) 525-3800  
(704) 525-9934 – Fax

November 19, 2012

Siting Committee  
Raoul Renaud, Hearing Officer  
Eric Solorio, Project Manager  
California Energy Commission  
1516 Ninth Street, MS-15  
Sacramento, CA 95814

**Re: Quail Brush Generation Project (11-AFC-03)  
Initial Response to Dorian Houser’s Intervenor Data Requests, 36 through 40**

Dear Members of the Siting Committee and Mr. Solorio:

In response to Dorian Houser’s (Intervenor) Data Requests, 36 through 40, dated October 30, 2012, Quail Brush Generation Project (Quail Brush) objects to the following data request pursuant to Section 1716(f) of the Commission’s regulations: Request 37. This Data Request is itemized below along with a description of the grounds for the objection. Quail Brush will respond to the remainder of Dorian Houser’s (Intervenor) Data Requests, 36 through 40, on November 30, 2012.

37. Please provide a modeling interface that allows the acoustic model to be duplicated.

Please provide all input data utilized for modeling purposes. Section 1716 of the Commission’s regulations permits any party to request “information reasonably available to Quail Brush which is relevant to the notice or application proceeding or reasonably necessary to make any decision on the notice or application.” Quail Brush objects to this data request because it seeks information that is not relevant to this proceeding, and that is not reasonably necessary for the Commission to render a decision. Quail Brush is under no obligation to provide the software it uses for acoustic modeling purposes. The Commission possesses the software it needs in order to analyze the Project’s impacts and render a decision on the AFC. There is no requirement that a power plant applicant provide software to the intervenors in the proceeding. Any interested party may purchase the software if he or she wishes.

I certify under penalty of perjury that the foregoing is true, correct, and complete to the best of my knowledge

Regards,

A handwritten signature in black ink, appearing to read "C. Richard Neff". The signature is written in a cursive, somewhat stylized font.

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C. Richard Neff  
Vice President