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November 29, 2012

Siting Committee  
Raoul Renaud, Hearing Officer  
Eric Solorio, Project Manager  
California Energy Commission  
Docket No. 11-AFC-3  
1516 9th Street  
Sacramento, CA 95814

**Re: Cogentrix Quail Brush Generation Project - Docket Number 11-AFC-03,  
Response to Intervenor Center for Biological Diversity and Preserve Wild  
Santee and Center for Biological Diversity Data Requests 1-17 (Set One)**

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, Bingham McCutchen LLP hereby submits the Response to Intervenor Center for Biological Diversity and Preserve Wild Santee and Center for Biological Diversity Data Requests 1-17 (Set One). The remaining data requests were addressed in the Applicant's 20-day initial response to these data requests docketed on November 19, 2012. 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 (415) 393-2572.

Sincerely yours,



Ella Foley Gannon

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

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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 11/19/2012)

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\*indicates change

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DECLARATION OF SERVICE

I, Margaret Pavao, declare that on November 29, 2012, I served and filed copies of the attached **Response to Intervenor Center for Biological Diversity and Preserve Wild Santee and Center for Biological Diversity Data Requests 1-17 (Set One)**, dated November 29, 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, and that I am over the age of 18 years and not a party to the proceeding.



\_\_\_\_\_  
Margaret Pavao



## Quail Brush Genco, LLC

A Project Company of Cogentrix Energy, LLC

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(704) 525-3800  
(704) 525-9934 – Fax

November 29, 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),  
Response to Intervenors Center for Biological Diversity and Preserve Wild  
Santee and Center for Biological Diversity Data Requests 1-17 (Set One)**

Dear Members of the Siting Committee and Mr. Solorio:

In response to Center for Biological Diversity and Preserve Wild Santee (Intervenors) Data Requests, 1 through 17, Quail Brush Generation Project (Quail Brush) provided an initial response to Requests 7, 8, 9, 10, 11, 12, and 17 on November 19, 2012. Quail Brush provides responses to Requests 1-6, and 13-16 below.

1. Data Request: In a wind-driven wildfire, please describe the specific tasks and the amount of time required per task for "shutdown and de-energizing of the power plant ... to protect human health, the electrical grid and the environment."

**Response:**

The required time to shut-down a Wartsila 20V34SG engine from full load is 1 minute. If required, a single shut-down command can be issued for all engines simultaneously. This ability allows the removal of all generation in one minute even if the facility is operating at 100% capacity. Once the engine shut-down has occurred, the incoming electrical breaker can be immediately opened to disconnect the facility from the grid thus de-energizing all power within the plant. At that same time, the natural gas flow to the facility will be stopped via a control valve located at the gas regulating and metering station. The post engine shut-down events of de-energizing and cutting-off the natural gas flow will take an additional minute.

The Quail Brush facility will operate under a Wildfire Response Emergency Action Plan (EAP). A draft of this plan was docketed on July 9, 2012. The purpose of the EAP is to facilitate and organize employer and employee actions during a wildfire emergency. Plant response and notification procedures will be conducted as described in the EAP.

2. Data Request: What “shutdown and de-energizing” procedures would take place in sequence and what procedures are simultaneous?

**Response:**

Refer to the response to Data Request 1 above.

3. Data Request: What procedures are automated and what procedures would be manual?

**Response:**

Specific shutdown and de-energizing procedures will be determined during the detail design of the facility in compliance with applicable Laws, Ordinances, Regulations, and Standards (LORS). Refer to the response to Data Request 1 above.

4. Data Request: What are the potential causes of “shutdown and de-energizing” procedural failure and what back-up measures would be made available?

**Response:**

The Applicant cannot conceive of a “procedural failure”, nor is aware of any historical event, which would preclude the ability of the facility to be shutdown and de-energized. The facility has the ability to disconnect unilaterally from the natural gas supply and transmission system. San Diego Gas and Electric (SDG&E) also has the ability to unilaterally disconnect the natural gas supply and transmission system from the facility.

5. Data Request: Please specifically estimate the time to accomplish procedural measures and the additional time if back-up measures are required.

**Response:**

Refer to the response to Data Request 4 above.

6. Data Request: For any task described in Requests 1-17 that may not be completed in time or before a fire front passes over the power plant site, please specify the next backup measure, if any, and the range of potential consequences for not completing any specific measure needed to secure the power plant during a wind-driven wildfire.

**Response:**

Refer to the response to Data Request 4 above.

13. Data Request: Please describe the brush management zones including lengths, locations and maintenance requirements. Would brush management zones extend off of the Project site parcel? What are the biological impacts and what is the mitigation for biological impacts of brush management zones?

**Response:**

Brush management zones are shown and described on the Brush Management Plan docketed on October 31, 2012. Brush Management zones do not extend off the Project site parcel. Brush management zones are within the established Project disturbance footprint with no additional biological impact. Mitigation of brush management zones is included in the Biological Resources Survey Report, docketed on October 15, 2012.

14. Data Request: What are the evacuation routes and safety zones for Project personnel and visitors on and off-site?

**Response:**

The evacuation route will be via Sycamore Landfill Road toward Mast Blvd. Facility safety zones will be determined during facility detail design in conjunction with the San Diego Fire-Rescue Department (SDFD). Evacuation will be in accordance with facility emergency action plans (EAPs).

15. Data Request: How much time will it take to prepare transportation, load passengers, account for employees and visitors, depart and arrive at safety zones identified?

**Response:**

Once an evacuation order is given, it would take approximately five minutes for employees and visitors to reach their vehicles, exit the facility, and reach Mast Blvd. This time frame is achievable due to the relatively small size of the facility and limited number of employees and expected visitors on-site at any one time.

16. Data Request: Please describe the capacity, design and location of any shelter-in-place structure.

**Response:**

The Shelter-in-Place will be located in the facility's control room. Shelter-in-Place dimensions, materials of construction, and required equipment will be determined in conjunction with SDFD as part of the comprehensive fire protection plan.

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", written in a cursive style. The signature is positioned above a horizontal line.

---

C. Richard Neff  
Vice President

cc: Docket (11-AFC-3)