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401 East Chapman Avenue - Placentia, California 92870

March 23, 2009

Mr. Michael D. Mills.
South Coast Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178

Re: Canyon Power Plant Facility ID No: 153992

Dear Mr. Mills,

The City of Placentia has reviewed AQMD's Preliminary Determination of Compliance for the Canyon Power Plant (CPP), dated February 18, 2009. The City is concerned that the information supporting the determination is not complete. As presented, emissions from the CPP could adversely impact Placentia residents. For the reasons outlined below, the City of Placentia requests that a permit pursuant to AQMD Rules 212 and 2006 not be granted for the plant, and that the application be revised as follows:

CPP should be revised to incorporate a combined cycle system instead of a single or simply-cycle turbine. Combined cycle systems are currently used worldwide, and emit lower air pollutant emissions than single cycle turbines. The combined-cycle combustion turbine has been found to provide fast start-up, flexibility and reliability, and increases power while reducing fuel use and NOx emissions¹.

An example of combined cycle systems include the SaskPower's Queen Elizabeth Power Station (QEPS) in Saskatchewan, Canada that has two steam turbines that have recently been repowered with combined cycle. The re-powering system installed in SaskPower's Queen Elizabeth Power Station has significantly improved overall plant efficiency, power output and operational flexibility while dramatically reducing the plant's NOx emissions².

Another example is the TransAlta Centralia Generation LLC Big Hanaford Project in Lewis County, Washington. The Big Hanaford was a coal-fired facility retrofitted to combined-cycle combustion turbine power. The conversion has resulted in significant emission reductions including PM10, NOx, SO2, CO, and volatile organic compounds (VOCs).

Combined cycle combustion power plants have been found to achieve 60 % more fuel efficiency, and to emit 10% less NOx and as much as 15 % less CO2 emissions than a single cycle system³⁴. In view of AB32 and statewide efforts to reduce CO2 and other air

1 <http://www.otsg.com/section/view/?fnode=18>

2 <http://www.iapws.jp/Proceedings/Symposium15/735Sasao.pdf>

3 http://www.gepower.com/prod_serv/products/gas_turbines_cc/en/h_system/index.htm

4 U.S. EPA Clean Air Markets database of hourly power plant emissions. (2007 comparisons)

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07-AFC-9	
DATE	<u>03/23/09</u>
RECD.	<u>04/17/09</u>

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pollutants, the City of Placentia strongly urges AQMD to withhold permits until the application is revised to a combined cycle system.

The City does not oppose the concept and need of a peaker power plant; however, given our obligation to ensure our residents health and safety is maintained, the availability of current and proven technology, such as a combined system, is called for in such an area with close proximity to residential uses.

Please don't hesitate to call me if you have any questions.

Sincerely,


Andrew R. Muth, P.E.
City Engineer

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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 *CANYON POWER*
*PLANT PROJECT***

Docket No. 07-AFC-9

PROOF OF SERVICE

(Revised 2/25/2009)

APPLICANT

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(SCPPA)
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DECLARATION OF SERVICE

I, Maria Santourdjian, declare that on April 17, 2009, I served and filed copies of the attached City of Placentia Comments on Canyon Power Plant. The original document, filed with the Docket Unit, is accompanied by a copy of the most recent Proof of Service list, located on the web page for this project at:

[<http://www.energy.ca.gov/sitingcases/canyon/index.html>]. The document has been sent to both the other parties in this proceeding (as shown on the Proof of Service list) and to the Commission's Docket Unit, in the following manner:

(Check all that Apply)

For service to all other parties:

sent electronically to all email addresses on the Proof of Service list;

by personal delivery or by depositing in the United States mail at Sacramento, California with first-class postage thereon fully prepaid and addressed as provided on the Proof of Service list above to those addresses **NOT** marked "email preferred."

AND

For filing with the Energy Commission:

sending an original paper copy and one electronic copy, mailed and emailed respectively, to the address below (preferred method);

OR

depositing in the mail an original and 12 paper copies, as follows:

CALIFORNIA ENERGY COMMISSION

Attn: Docket No. 07-AFC-9
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512

docket@energy.state.ca.us

I declare under penalty of perjury that the foregoing is true and correct.

Original Signature in Dockets
Maria Santourdjian