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| DOCKET | |
| 07-AFC-6 | |
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June 23, 2009

KIMBERLY J. HELLWIG
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VIA EMAIL AND US MAIL

Mike Monasmith, Siting Project Manager
California Energy Commission
1516 Ninth Street, MS-15
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**Re: Carlsbad Energy Center Project (07-AFC-6)
Correspondence to Dr. Steve Moore, San Diego Air Pollution Control District**

Dear Mr. Monasmith:

On behalf of Carlsbad Energy Center LLC, please find enclosed for docketing correspondence to Dr. Steve Moore at the San Diego Air Pollution Control District regarding fuel use for the Encina Power Station, Units 1, 2, and 3 during the years 2002 through 2006. In addition, data related to this information is contained on the enclosed disc (eight copies are provided for distribution to your staff).

Due to the size of the files contained on the discs, such information cannot be submitted to dockets or served to the parties via email. To that end, paper copies of this correspondence, the enclosed letter to Dr. Moore, and a copy of the disc will be served to all parties via United States mail delivery.

Very truly yours,


Kimberly J. Hellwig
Senior Paralegal

Enclosure

cc: See Enclosed Proof of Service
Will Walters, Aspen Environmental Group

June 16, 2009



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Dr. Steve Moore
Engineering Group
San Diego Air Pollution Control District
10124 Old Grove Road
San Diego, CA 92131

Subject: Application for Authority to Construct for the Proposed Carlsbad
Energy Center Project

Dear Dr. Moore:

On behalf of Carlsbad Energy Center LLC, we are pleased to provide the following information regarding the fuel use for the Encina Power Station Units 1, 2, and 3 during the period from 2002 to 2006. As you know, this is the period used to calculate the baseline emissions for Encina Units 1, 2, and 3 for the permitting of the proposed Carlsbad Energy Center Project (CECP). Based on a recent request by the San Diego Air Pollution Control District (SDAPCD), we re-examined the fuel use during this period in order to explain the apparent differences between the fuel use recorded by the power plant's Continuous Emissions Monitoring Systems (CEMS) under USEPA Part 60 and that reported for Acid Rain purposes under USEPA Part 75. Based on this review, we have concluded that while there are some differences between the fuel use shown in the two data sets, the fuel use levels used to calculate the 2002 to 2006 baseline emissions for Encina Units 1, 2, and 3 are reasonably accurate and should remain unchanged. The following paragraphs discuss this conclusion in more detail.

Background

Fuel use for Encina Units 1, 2, and 3 is reported as part of several regulatory programs: SDACPD Rule 69 annual reports, SDAPCD Annual Operating/Emission Inventory reports, and EPA Acid Rain reports. In addition to these reports, the fuel use for the boilers from 2002 to 2006 was used to calculate the baseline emissions for Units 1, 2, and 3 as part of the permitting process for the proposed CECP. The following tables summarize the annual fuel use for Encina Units 1, 2, and 3 for the 2002 to 2006 period.

| Table 1 | | | | | |
|---|---------------|---------------|---------------|---------------|---------------|
| Fuel Use Reported For SDAPCD Annual Emission Inventories | | | | | |
| (mmscf/year) | | | | | |
| | 2002 | 2003 | 2004 | 2005 | 2006 |
| Unit 1 | 1640.0 | 1349.6 | 1962.6 | 1750.4 | 583.5 |
| Unit 2 | 2060.8 | 1675.0 | 2504.2 | 1900.2 | 1093.3 |
| Unit 3 | 2145.8 | 2383.8 | 3890.7 | 2083.5 | 1326.9 |
| Total | 5846.6 | 5408.4 | 8357.5 | 5734.1 | 3003.7 |

| Table 2 | | | | | |
|--|---------------|---------------|---------------|---------------|---------------|
| Fuel Use Reported For Rule 69 Reports | | | | | |
| (mmscf/year) | | | | | |
| | 2002 | 2003 | 2004 | 2005 | 2006 |
| Unit 1 | 1640.0 | 1327.5 | 1962.6 | 1563.4 | 362.7 |
| Unit 2 | 2060.8 | 1660.9 | 2504.2 | 1803.7 | 850.5 |
| Unit 3 | 2145.8 | 2348.8 | 3890.7 | 1818.3 | 873.8 |
| Total | 5846.6 | 5337.2 | 8357.5 | 5185.4 | 2087.0 |

| Table 3 | | | | | |
|--|---------------|---------------|---------------|---------------|---------------|
| Fuel Use Reported For Acid Rain Reports | | | | | |
| (mmscf/year) | | | | | |
| | 2002 | 2003 | 2004 | 2005 | 2006 |
| Unit 1 | 1640.0 | 1327.5 | 1962.6 | 1563.4 | 362.7 |
| Unit 2 | 2060.8 | 1660.9 | 2504.2 | 1803.7 | 850.5 |
| Unit 3 | 2145.8 | 2348.8 | 3890.7 | 1818.3 | 873.8 |
| Total | 5846.6 | 5337.2 | 8357.5 | 5185.4 | 2087.0 |

| Table 4 | | | | | |
|--|---------------|---------------|---------------|---------------|---------------|
| Fuel Use Reported For Encina 2002-2006 Baseline Emissions | | | | | |
| (mmscf/year) | | | | | |
| | 2002 | 2003 | 2004 | 2005 | 2006 |
| Unit 1 | 1640.0 | 1349.6 | 1962.6 | 1750.4 | 583.5 |
| Unit 2 | 2060.8 | 1675.0 | 2504.2 | 1900.2 | 1093.3 |
| Unit 3 | 2145.8 | 2383.8 | 3890.7 | 2083.5 | 1326.9 |
| Total | 5846.6 | 5408.4 | 8357.5 | 5734.1 | 3003.7 |

| | 2002* | 2003* | 2004 | 2005 | 2006 |
|--------------|-------|-------|---------------|---------------|---------------|
| Unit 1 | | | 1734.3 | 1661.7 | 551.8 |
| Unit 2 | | | 2510.7 | 1823.7 | 1070.4 |
| Unit 3 | | | 3805.0 | 2107.8 | 1319.2 |
| Total | | | 8050.0 | 5593.2 | 2941.4 |

*Note that data for 2002 and 2003 are not available because the new CEMS were not operating until approximately mid-2003. The hourly data from the old CEMS for 2002 and first part of 2003 are not available electronically.

Fuel Use Comparison

The following tables provide several comparisons between the annual fuel use reported for the various air quality regulatory reports. In addition to these annual fuel use comparisons, we compared the hourly fuel use values in the individual boiler CEMS data with the hourly values in the Acid Rain data. Due to the large size of this hourly data comparison, this detailed comparison is shown in the enclosed compact disc (in an Excel file).

| | 2002 | 2003 | 2004 | 2005 | 2006 |
|--------------|-------------|-------------|-------------|-------------|-------------|
| Unit 1 | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% |
| Unit 2 | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% |
| Unit 3 | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% |
| Total | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% |

| | 2002 | 2003 | 2004 | 2005 | 2006 |
|--------------|-------------|-------------|-------------|-------------|--------------|
| Unit 1 | 0.0% | 1.6% | 0.0% | 10.7% | 37.8% |
| Unit 2 | 0.0% | 0.8% | 0.0% | 5.1% | 22.2% |
| Unit 3 | 0.0% | 1.5% | 0.0% | 12.7% | 34.1% |
| Total | 0.0% | 1.3% | 0.0% | 9.6% | 30.5% |

| Table 8 | | | | | |
|--|------|------|-------------|-------------|-------------|
| Fuel Use Comparison Between SDAPCD Emission Inventories and Encina Individual Boiler CEMS | | | | | |
| (percent difference: Inventory vs CEMS) | | | | | |
| | 2002 | 2003 | 2004 | 2005 | 2006 |
| Unit 1 | | | 11.6% | 5.1% | 5.4% |
| Unit 2 | | | -0.3% | 4.0% | 2.1% |
| Unit 3 | | | 2.2% | -1.2% | 0.6% |
| Total | | | 3.7% | 2.5% | 2.1% |

| Table 9 | | | | | |
|--|-------------|-------------|-------------|-------------|--------------|
| Fuel Use Comparison Between SDAPCD Emission Inventories and Acid Rain Reporting | | | | | |
| (percent difference: Inventory vs Acid Rain) | | | | | |
| | 2002 | 2003 | 2004 | 2005 | 2006 |
| Unit 1 | 0.0% | 1.6% | 0.0% | 10.7% | 37.8% |
| Unit 2 | 0.0% | 0.8% | 0.0% | 5.1% | 22.2% |
| Unit 3 | 0.0% | 1.5% | 0.0% | 12.7% | 34.1% |
| Total | 0.0% | 1.3% | 0.0% | 9.6% | 30.5% |

| Table 10 | | | | | |
|---|------|------|--------------|-------------|--------------|
| Fuel Use Comparison Between Individual Boiler CEMS and Acid Rain Reporting | | | | | |
| (percent difference: CEMS vs Acid Rain) | | | | | |
| | 2002 | 2003 | 2004 | 2005 | 2006 |
| Unit 1 | | | -13.2% | 5.9% | 34.3% |
| Unit 2 | | | 0.3% | 1.1% | 20.5% |
| Unit 3 | | | -2.3% | 13.7% | 33.8% |
| Total | | | -3.8% | 7.3% | 29.0% |

| Table 11 | | | | | |
|--|-------------|-------------|-------------|-------------|-------------|
| Fuel Use Comparison Between Rule 69 Reports and Acid Rain Reporting | | | | | |
| (percent difference: Rule 69 vs Acid Rain) | | | | | |
| | 2002 | 2003 | 2004 | 2005 | 2006 |
| Unit 1 | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% |
| Unit 2 | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% |
| Unit 3 | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% |
| Total | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% |

As shown by the above comparisons, there are several differences in the annual fuel use between the various reports and data sets. These comparisons point out the following agreements and disagreements between the data:

- The fuel use reported as part of the SDACPD annual emission inventories is identical to the levels used to calculate the Encina Units 1, 2, and 3 2002-2006 baseline emissions for CO, VOC, SO_x, and PM₁₀. As you know, the Encina Units 1, 2, and 3 baseline emissions for NO_x were based mainly on CEMS data rather than fuel use/emission factors.
- The annual fuel use reported as part of the Acid Rain reporting is identical to the levels used for the SDAPCD Rule 69 reports.
- While there are slight differences, the annual fuel use shown by the individual boiler CEMS is fairly consistent with the annual fuel used reported as part of the SDAPCD annual emission inventories.
- During the period from 2002 to 2004, there is only a small difference between the fuel use reported as part of the SDACPD annual emission inventories and the Acid Rain reporting. This difference increases significantly, however, in 2005 and 2006.
- There is a similar trend in the comparison between the individual boiler CEMS data and the Acid Rain reporting, the difference between the two data sets is small in 2004, but it increases significantly in 2005 and 2006.

Analysis of Fuel Use Differences

In order to analyze the possible reasons for the fuel use differences discussed above, it is important to understand how the fuel meters are configured at the Encina Power Station. It is also important to understand the different data collection systems that are used at the power plant to monitor boiler fuel use and generate the operating data used for each type of regulatory report. Each individual boiler is equipped with its own fuel flow meter. The signals from each of these individual fuel flow meters are sent to three different data collection systems, as described below.

- Common unit chimney (CUC) CEMS: This system collects and records the fuel use for each of the five boilers at the power plant. The CUC system also monitors the NO_x emissions for the common stack.
- Individual Boiler CEMS: Each of the five boilers at the power plant is equipped with its own CEMS which monitors/records the fuel use and NO_x emissions for each boiler.
- NERC-GADS System: Each boiler is equipped with its own fuel use integrator which is periodically manually read by the power plant operators and reported to

the North American Electric Reliability Corporation-Generating Availability Data System (NERC-GADS) system. This system records the fuel use and operating hours for each boiler.

Each of the above data collection systems is used as part of air quality regulatory reporting. The following describes which data collection system is used for each type of report:

- Acid Rain Quarterly Reporting: In addition to NO_x emissions from the common stack, the Acid Rain reports include individual boiler fuel use. To generate the individual boiler fuel use in these reports, the fuel flow data collected by the CUC CEMS are used by the EDR software for the Acid Rain quarterly reporting.
- SDAPCD Annual Operating/Emission Inventory Data Reports: The SDAPCD Annual Emission Inventory reports include annual operating hours and fuel use for each boiler. The individual boiler annual fuel use and operating hours from the NERC-GADS system are reported to the SDAPCD for use in the SDAPCD Annual Emission Inventory Reports.
- SDAPCD Rule 69 Reports: The SDAPCD Rule 69 Reports show both common stack monthly and annual NO_x emissions as well as individual boiler annual operating hours and fuel use. These emissions/operating data are based on data collected by the CUC CEMS.

As discussed above, the annual fuel use levels are identical for the SDAPCD Emission Inventory Reports and Encina Units 1, 2, and 3 2002-2006 baseline emissions. This agreement in the two sets of data is expected because the fuel use data from the SDAPCD Emission Inventory reports were used to calculate the 2002-2006 baseline emissions. In addition, the annual fuel use levels are identical for the Acid Rain reports and Rule 69 reports. Once again, this agreement in the data is expected because the same data collection system (CUC CEMS) was used to prepare both reports.

There is a slight difference between the annual fuel use for the SDAPCD Emission Inventories and the individual boiler CEMSs. This difference is most likely due to the fact that two different database systems are being used (i.e., NERC-GADS system vs. individual boiler CEMS). Because the differences are small (less than 4%, total for the three boilers, in any year), and because two different data collection systems are being used, this difference between the two datasets is not considered a significant indicator of a data collection or reporting problem.

When the Acid Rain data are compared to either the SDAPCD Annual Emission Inventory data or individual Boiler CEMS data, there are significance differences in annual fuel use during 2005 and 2006. These differences are especially true during 2006. Because the SDAPCD Emission Inventory fuel use data are based on annual reports, it is not possible to make a detailed comparison between these data and the fuel use reported for Acid Rain, which are hourly data. However, it was possible to compare the hourly individual boiler CEMS fuel use data with the Acid Rain reported data to determine the likely causes for these differences. The comparison revealed the following issues:

- For all three units during 2003 (partial year with new CEMS) through 2006, there appears to be a 1-hour time shift that occurs during the middle of the year (April to October) for the individual boiler CEMS. This time shift does not appear to occur with the Acid Rain data. The likely cause of this time shift is that the individual boiler CEMS are undergoing a clock hour shift due to Daylight Saving Time (April to October) while the CUC CEMS (used for Acid Rain reporting) is not doing this time shift. This clock hour shift does not affect annual fuel use totals, but it was necessary to correct this time shift when comparing hourly fuel use levels. The results of time shifting are shown in the fuel use, percentage difference calculation columns on each tab in the enclosed Excel spreadsheet. The hours to which the time shift calculation was applied are shaded in orange.
- After the above time shift was corrected, Unit 1 shows a fairly steady difference of 10-15% between the individual boiler CEMS fuel use data and the Acid Rain reported data for partial year 2003 and 2004, while Units 2 and 3 show less than a 5% difference during these same years. However, for 2005 and 2006 there are major differences between the two databases for all three units. Because the same fuel meters are used to monitor fuel flow rates for the individual boiler CEMS and for Acid Rain reporting, the consistent difference between the two data sets in 2003 and 2004 is most likely due to some type of instrument bias. For example, since the fuel meter signal is split and signal transmitters are used to send the signals to the two different data collection systems, there may be a fuel meter signal strength issue that caused the consistent difference in the two data sets.
- As discussed above, for 2005 there are major differences between the two data sets. This significant difference between the two data sets begins in the second half of 2005 for all three boilers. For Unit 1, this difference begins in early June 2005 with the Acid Rain hourly fuel use levels approximately 50% lower than the CEMS data. Based on a comparison of the heat rates, it appears that the Acid Rain values are too low rather than the CEMS values being too high. For example, when the Acid Rain fuel use levels drop for Unit 1 in early June 2005 the heat rate drops to approximately 5 kscf/MW compared to the normal levels of 10 kscf/MW to 12 kscf/MW shown by both data sets during 2003 and 2004. While this error corrects itself at the end of June 2005, it reoccurs in early November 2005 and continues for the remainder of the year. This same significant change in the difference between the two data sets occurs for Unit 2 in early November 2005 and for Unit 3 in late August 2005, with the Acid Rain reported data once again apparently underestimating hourly fuel use. While the likely cause for this increase in the difference between the two data sets in 2005 is unknown at this time, the end result is that it causes the Acid Rain data to underestimate annual fuel flow levels for the three boilers.
- The major difference between the two data sets in 2006 appears to be due to the use of data substitution for the Acid Rain data for the entire year, for all three boilers. The data substitution approach is clearly evident in the Acid Rain hourly data which shows a set of identical fuel flow rates that are repeated throughout the year. The approach also appears to underestimate the Acid Rain hourly fuel use

by approximately 30%. The underestimation of fuel use in the Acid Rain data once again can be confirmed by looking at the boiler heat rates. During 2006 the Acid Rain data show heat rates ranging from 7 kscf/MW to 8 kscf/MW compared to the normal levels of 10 kscf/MW to 12 kscf/MW shown by both data sets in 2003 and 2004.

- For the five years reviewed and all three boilers, there is a consistent pattern where the Acid Rain data show hourly fuel use slowly increasing over a several-hour period during boiler startups while the CEMS data are not available until the hourly fuel use level reaches some predetermined level. An example of this can be seen for Unit 1 on July 11, 2003. The Acid Rain data show hourly fuel use increasing over approximately a 12-hour period during the boiler startup while the CEM data are not available. The likely cause for this difference is an algorithm in the individual boiler CEMS that excludes boiler startup hours from the hourly average data. The net effect of the reporting difference is that the CEMS data may be slightly underestimating the actual annual fuel use for each boiler. This small effect can be seen in the comparison between the individual boiler CEMS fuel use and the SDACPD emission inventory fuel use during 2004, 2005, and 2006 (years with complete hourly CEMS data).

Conclusion

As discussed above, there are a number of issues identified for both the individual boiler CEMS fuel use data and the Acid Rain fuel use data. It is clear that the Acid Rain fuel use data reported during 2006 underestimated actual fuel use for all three boilers. To a lesser extent, this also occurred during the second half of 2005 with the downward shift in the Acid Rain hourly fuel use levels. Because the same database system used to generate the Acid Rain fuel use data was also used to generate the individual boiler fuel use reported as part of the Rule 69 reports, these same fuel use issues are reflected in the Rule 69 reports. There are also issues with the individual boiler CEMS, namely the fairly consistent bias between the two data sets (CEMS data vs. Acid Rain) in 2003 and 2004, and the apparent exclusion of hourly fuel flow rates from the CEMS data during boiler startup hours, resulting in an underestimate of fuel use and emissions from this system.

Two data sets that have fairly close agreement are the SDACPD Emission Inventory fuel use and the individual boiler CEMS fuel use data. For the three years with complete CEMS data there is only approximately a 3% difference between these two data sets. This same agreement between two data sets can also be seen in the comparison between the SDAPCD Emission Inventory fuel use and the Acid Rain data during 2002, 2003, and 2004 (years with no significant issues with Acid Rain data), with a difference of less than 1% during this period. The above comparisons are a good indicator that the annual fuel use reported as part of the SDAPCD Emission Inventories is correct. Since the fuel use for the SDAPCD Emission Inventories is also the basis of the 2002 to 2006 baseline emission calculations for Encina Units 1, 2, and 3, this means that the baseline emission calculations for CO, VOC, SO_x, and PM₁₀ for the three boilers are also correct.

The remaining issue is whether the 2002-2006 NOx emission baseline is correct for Encina Units 1, 2, and 3. Because the Encina boilers are equipped with NOx CEMS, the 2002-2006 baseline NOx emissions for Units 1, 2, and 3 were based on mainly on CEMS data (with the exception of 2002 and a part of 2003 where Rule 69 emission factors were used). The approach used to calculate the current NOx baseline emissions for the three boilers is discussed in our February 11, 2009 letter to the SDAPCD. None of the issues identified above indicate that the individual boiler CEMS are overestimating fuel use. Consequently, there is no reason to believe that the individual boiler CEMS are overestimating NOx emissions. If anything, the issues discussed above seem to indicate that the individual boiler CEMS are excluding hourly NOx emissions during boiler startups, which would result in an underestimation of the 2002-2006 baseline NOx emissions for the boilers. Therefore, the current 2002-2006 NOx emission baseline for Units 1, 2, and 3 is very likely underestimating the NOx emission benefits associated with the shutdown of these boilers. At this point we would like to keep the 2002-2006 NOx emission baseline at the levels discussed in our February 11, 2009 letter, rather than capture additional credits by adjusting the CEMS dataset.

If you have any questions or need any additional information, please contact me at (916) 273-5139.

Sincerely,

A handwritten signature in cursive script that reads "Tom Andrews for".

Tom Andrews
Senior Engineer

Enclosure (CD with Excel file)

cc: George L. Piantka, Carlsbad Energy Center LLC
John McKinsey, Stoel
Will Walters, CEC
Michael Monasmith, CEC
CEC Dockets Office (07-AFC-6)

BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT
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APPLICATION FOR CERTIFICATION
FOR THE CARLSBAD ENERGY
CENTER PROJECT

Docket No. 07-AFC-6
PROOF OF SERVICE
(Revised 5/19/2009)

Carlsbad Energy Center Project

Correspondence to Dr. Steve Moore, San Diego Air Pollution Control District

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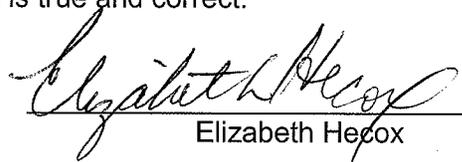
DECLARATION OF SERVICE

I, Elizabeth Hecox, declare that on June 23, 2009, I deposited copies of the aforementioned document in the United State mail at 980 Ninth Street, Suite 1900, Sacramento, California 95814, with first-class postage thereon fully prepaid and addressed to those identified on the Proof of Service list above.

OR

Transmission via electronic mail was consistent with the requirements of California Code of Regulations, Title 20, sections 1209, 1209.5, and 1210. All electronic copies were sent to all those identified on the Proof of Service list above.

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



Elizabeth Hecox