



DOCKET	
07-AFC-6	
DATE	APR 15 2010
RECD.	APR 15 2010

500 Capitol Mall, Suite 1600
Sacramento, California 95814
main 916.447.0700
fax 916.447.4781
www.stoel.com

MELISSA A. FOSTER
Direct (916) 319-4673
mafoster@stoel.com

April 15, 2010

VIA HAND DELIVERY AND E-MAIL

Mike Monasmith, Siting Project Manager
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

**Re: Carlsbad Energy Center Project (07-AFC-6)
One-Hour NO₂ National Air Quality Standard Modeling**

Dear Mr. Monasmith:

On behalf of Carlsbad Energy Center LLC, please find the enclosed correspondence from Sierra Research to the San Diego Air Pollution Control District regarding One-Hour NO₂ National Air Quality Standard Modeling for the Carlsbad Energy Center Project. On this date, a copy of the same will be hand delivered to the Docket Unit and served on all parties via email and U.S. Mail.

Should you have any questions regarding this document, please contact our office.

Very truly yours,

A handwritten signature in black ink that reads "Melissa A. Foster".

Melissa A. Foster
MAF:jmw

Enclosure

cc: See Proof of Service List

April 13, 2010

Ralph DeSiena
Modeling and Meteorology Group
San Diego Air Pollution Control District
10124 Old Grove Road
San Diego, CA 92131



1801 J Street
Sacramento CA 95811
Tel: (916) 444-6666
Fax: (916) 444-8373

Ann Arbor MI
Tel: (734) 761-6666
Fax: (734) 761-6755

Subject: Application for Authority to Construct for the Proposed Carlsbad Energy Center Project – One-hour NO₂ National Air Quality Standard Modeling NO₂ Analysis

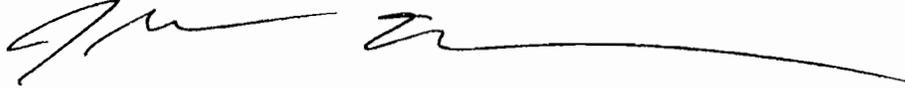
Dear Mr. DeSiena:

On behalf of Carlsbad Energy Center LLC, we are pleased to submit a supplemental dispersion modeling analysis that was performed to demonstrate compliance with the new one-hour nitrogen dioxide (NO₂) National Ambient Air Quality Standard (NAAQS) that goes into effect on April 12, 2010. This modeling was performed based on the approach discussed in our modeling protocol submitted to the District on March 4, 2010. As shown in the following table, the supplemental modeling analysis shows that the proposed Carlsbad Energy Center Project will be in compliance with the new one-hour NO₂ NAAQS. The modeling files for this analysis are included in the enclosed portable hard drive.

Supplement One-Hour NO₂ Modeling Analysis Carlsbad Energy Center Project		
Equipment and Operating Mode	Modeled Impact^a ($\mu\text{g}/\text{m}^3$)	NAAQS ($\mu\text{g}/\text{m}^3$)
New Equipment, ^b Normal Operation	141.9	188
New Equipment, ^b Normal Operation plus Existing Equipment ^c	145.2	188
New Gas Turbines, Commissioning	136.4	188
New Gas Turbines, Commissioning plus Existing Equipment ^c	139.8	188
New Gas Turbines, Startup ^d	134.9	188
Notes:		
a. Maximum three-year average (2004~2006) of 98th percentile one-hour total hourly NO ₂ concentration (modeled impact plus background ambient level) among all the receptors.		
b. New gas turbines plus the new emergency firepump engine.		
c. Existing Encina Power Plant boiler Units 4 and 5, and peaking gas turbine.		
d. Based on four-phase startup modeling approach.		

If you have any questions or need any additional information, please do not hesitate to contact me at 916-273-5139.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tom Andrews', with a long horizontal flourish extending to the right.

Tom Andrews
Senior Engineer

Enclosure (portable hard drive)

cc w/enclosure:

Will Walters, CEC

cc w/out enclosure:

Steve Moore, SDAPCD

George Piantka, Carlsbad Energy Center LLC

John McKinsey, Stoel

Michael Monasmith, CEC

CEC Dockets Office (07-AFC-6)

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 CARLSBAD ENERGY
CENTER PROJECT

Docket No. 07-AFC-6
PROOF OF SERVICE
(Revised 2/16/2010)

Carlsbad Energy Center LLC's
Submittal of Correspondence from Sierra Research to the San Diego Air Pollution
Control District regarding One-Hour NO₂ National Air Quality Standard Modeling
for the Carlsbad Energy Center Project

CALIFORNIA ENERGY COMMISSION
Attn: Docket No. 07-AFC-6
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512
docket@energy.state.ca.us

INTERESTED AGENCIES

California ISO
P.O. Box 639014
Folsom, CA 95763-9014
(e-mail preferred) e-recipient@caiso.com

APPLICANT

David Lloyd
Carlsbad Energy Center, LLC
1817 Aston Avenue, Suite 104
Carlsbad, CA 92008
David.Lloyd@nrenergy.com

INTERVENORS

City of Carlsbad
South Carlsbad Coastal Redevelopment Agency
Allan J. Thompson
Attorney for City
21 "C" Orinda Way #314
Orinda, CA 94563
allanori@comcast.net

George L. Piantka, PE
Carlsbad Energy Center LLC
1817 Aston Avenue, Suite 104
Carlsbad, CA 92008
george.piantka@nrenergy.com

City of Carlsbad
South Carlsbad Coastal Redevelopment Agency
Joseph Garuba, Municipals Project Manager
Ronald R. Ball, Esq., City Attorney
1200 Carlsbad Village Drive
Carlsbad, CA 92008 (e-mail preferred)
Joe.Garuba@carlsbadca.gov;
ron.ball@carlsbad.ca.gov

APPLICANT'S CONSULTANTS

Robert Mason, Project Manager
CH2M Hill, Inc.
6 Hutton Centre Drive, Ste. 700
Santa Ana, CA 92707
Robert.Mason@ch2m.com

Terramar Association
Kerry Siekmann & Catherine Miller
5239 El Arbol
Carlsbad, CA 92008
siekmann1@att.net

Megan Sebra
CH2M Hill, Inc.
2485 Natomas Park Drive, Ste. 600
Sacramento, CA 95833
Megan.Sebra@ch2m.com

California Unions for Reliable Energy ("CURE")
Gloria D. Smith & Marc D. Joseph
Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080
gsmith@adamsbroadwell.com
mdjoseph@adamsbroadwell.com

COUNSEL FOR APPLICANT

John A. McKinsey
Stoel Rives LLP
500 Capitol Mall, Ste. 1600
Sacramento, CA 95814
jamckinsey@stoel.com

INTERVENORS

Center for Biological Diversity
c/o William B. Rostove
EARTHJUSTICE
426 17th St., 5th Floor
Oakland, CA 94612
wrostov@earthjustice.org

Power of Vision
Julie Baker and Arnold Roe, Ph.D.
4213 Sunnyhill Drive
Carlsbad, CA 92008-3647
powerofvision@roadrunner.com

Rob Simpson
Environmental Consultant
27126 Grandview Avenue
Hayward, CA 94542
rob@redwoodrob.com

ENERGY COMMISSION

JAMES D. BOYD
Vice Chair and Presiding Member
jboyd@energy.state.ca.us

ANTHONY EGGERT
Commissioner and Associate Member
aeggert@energy.state.ca.us

Paul Kramer
Hearing Office
pkramer@energy.state.ca.us

Mike Monasmith
Siting Project Manager
mmonasmi@energy.state.ca.us

Dick Ratliff
Staff Counsel
dratliff@energy.state.ca.us

Jennifer Jennings
Public Adviser's Office
publicadviser@energy.state.ca.us

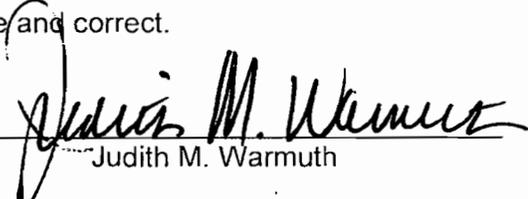
DECLARATION OF SERVICE

I, Judith M. Warmuth, declare that on April 15, 2010, I deposited copies of the aforementioned document in the United States mail at 500 Capitol Mall, Suite 1600, 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.



Judith M. Warmuth