

Power of Vision

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Wednesday, January 20, 2010

Commissioner Karen Douglas
Commissioner James Boyd
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Docket No. 07-AFC-6

Dear Commissioners:

Please find attached the Addendum to Prehearing Conference Statement from Power of Vision in the matter of the Carlsbad Energy Center Project.

Regards,

Arnold Roe, PhD
Julie Baker
Power of Vision

DOCKET

07-AFC-6

DATE JAN 20 2010

RECD. JAN 20 2010

CALIFORNIA ENERGY COMMISSION

In the Matter of:)
Application for Certification For the) Docket No. 07-AFC-6
Carlsbad Energy Center Project)
_____)

Power of Vision
Addendum to Prehearing Conference Statement

In item 9 of our Prehearing Conference Statement dated January 14, 2010, we reserved the right to list our Proposed Conditions of Certification after reviewing the prehearing conference and/or rebuttal statements from the applicant and CEC staff.

A number of issues we raised in our Opening Testimony dated January 5, 2010 have not been addressed by either the applicant or the CEC staff. Therefore we propose the following additional or amended Conditions of Certification.

Reference Exhibit 700

AQ-101 For each rolling 12-calendar-month period the combined operating hours for Units 6 and 7 shall not exceed 4,100 hours, nor shall their combined output exceed 60% of capacity. Upon reaching either of the above stated limits, the plant operator shall notify the California Independent System Operator and the San Diego County Air Pollution Control District of the non-availability of Units 6 and 7 for further power production during the balance of the 12-calendar-month period. This Condition shall not be altered by appeal or variance.

Verification: The project owner shall provide data to show compliance with this condition as part of the Quarterly Operations Report (**AQ-SC8**). The project owner shall make the site available for inspection of records by representatives of the District, ARB, and the Energy Commission.

Reference Exhibit 703

AQ-28, AQ-29, AQ-30 Delete section a.

Reference Exhibit 706

AQ-11 A startup period is the period of time that begins when fuel flows to the combustion turbine following a non-operational period. For purposes of determining compliance with the emission limits of this permit, the duration of a startup period shall **end when the gross electrical output (load) of the combustion turbine reaches 114 megawatts (MW) or the first 60 consecutive minutes of operation, whichever comes first.**

Verification: The project owner shall submit to the CPM the CTG startup event duration data demonstrating compliance with this condition as part of the Quarterly (AQ-SC8).

Reference Exhibit 726 **Previously proposed Condition of Certification repeated here for completeness.**

SOIL&WATER – 9 Prior to commencement of groundbreaking, the project owner shall obtain a NPDES permit from the SDRWQCB for the discharge of ocean water from the CECP desalination plant. This permit shall be separate from the current NPDES permit for the Encina Power Station.

Verification: Prior to groundbreaking the project owner shall provide the CPM with a copy of the NPDES permit from the SDRWQCB.

Reference Exhibit 733

Worker Safety-8 The project owner shall ensure that not less than two workers – two technical workers or one technical worker and one security staff – shall be present on the site (the “bowl”) at all times whenever the CECP is operating. **Provisions shall be provided on the site for the workers to shut down the units in an emergency.** The project owner shall prepare.....

Reference Exhibit 736

Power Plant Efficiency – 1 In order to comply with CEQA Title 14 CCR § 15126.4[a][1], the project owner shall, during the startup and test period, conduct tests to confirm that each power train (Unit 6 and Unit 7) shall independently be capable of a net plant efficiency of 55%.

Verification: The project owner shall, prior to commercial operation, provide the CPM with data from power train tests to show that this condition has been met.



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 12/30/2009)

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*Indicates change

DECLARATION OF SERVICE

I, Julie Baker, declare that on January 20, 2010, I served and filed copies of the attached Power of Vision Addendum to the Pre-Hearing Conference Statement dated January 20, 2010. 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/carslbad/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 by:

Electronically to all email addresses on the Proof of Service list;

AND

Hand delivered to the:

California Energy Commission
Attn: Docket No. 07-AFC-6
1516 Ninth Street
Sacramento, CA 95814
docket@energy.state.ca.us

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

Julie Baker

January 20, 2010