California Regional Water Quality Control Board
San Francisco Bay Region

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Arnold Schwarzenegger
Governor

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California Energy Commission
Attn: Christopher Meyer
1516 9th Street, MS - 2000
Sacramento, CA 95814

Subject: PG&E's Gateway Generating Station (GGS) License Petition Amendment

Dear Mr. Meyer:

This letter recommends that the California Energy Commission (CEC) require PG&E to use a wet cooling system that uses recycled wastewater instead of a dry cooling system at GGS, its proposed combined-cycle power plant in Antioch. This is because wet cooling with recycled wastewater will (a) eliminate the unreasonable use of about 240-acre feet of potable water per year, and (b) offer the potential for increased water recycling in the Antioch area into the future.

Unreasonable use of Potable Water

In this case, it is our understanding that pursuing a dry cooling system at GGS will require that PG&E use about 240-acre feet of potable water per year, whereas the use of recycled wastewater would eliminate the need for any potable water use. As such, we would view the use of potable water for GGS as unreasonable since recycled wastewater can be made available as an alternative.

As recognized in this Water Board's *Water Quality Control Plan for the San Francisco Bay Basin* (Basin Plan), the general welfare of the people of the State requires that water resources be put to beneficial use to the fullest extent, that the waste or unreasonable use of water be prevented, and that the conservation of such waters is in the interest of the people and for the public welfare. Further, California Water Code Section 13550, et seq, finds that use of potable water for nonpotable uses, such as at GGS, when recycled water is available is an unreasonable use of water. Any public agency, such as CEC, may require the use of recycled water in this case.

Expanding Water Recycling

The Delta Diablo Sanitation District (District) has informed us that if PG&E implements wet cooling with recycled wastewater at GGS, the infrastructure that would supply that recycled water will allow other potable water users in the vicinity to expand or initiate recycled water use.

This is because the District's proposed satellite wastewater treatment plant in Antioch will meet the State's Title 22 recycled water standards and offer potential recycled water users a source of recycled water that is in close proximity. Therefore, the District will have the potential to serve more users more cost-effectively. The Water Board supports such forward planning as it has the potential to further reduce potable water use into the future, consistent with the California Water Code and the Basin Plan.

Finally, while it is not the direct purview of the Water Board, we also recommend that the CEC evaluate the potential greenhouse gas emissions from both the wet cooling and dry cooling system alternatives. Our understanding is that more fuel is needed for the dry cooling system to equal the output of the wet cooling system, resulting in increased greenhouse gas emissions from a dry cooling system. Thus, it appears that the use of a wet cooling system using recycled wastewater at GGS has the type of co-benefits that the public is increasingly demanding at all infrastructure projects.

We appreciate the opportunity to provide input on GGS. If you have any questions concerning this communication, please contact Robert Schlipf at (510) 622-2478, or via e-mail at rschlipf@waterboards.ca.gov.

Sincerely,

Bruce H. Wolfe
Executive Officer

cc: Gary Darling, Delta Diablo Sanitation District, 2500 Pittsburg-Antioch Highway, Antioch, CA 94509-1373
Michele Pla, Bay Area Clean Water Agencies, PO Box 24055, MS 702, Oakland, CA 94623