CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET
SACRAMENTO, CA 95814-5512

DOCKET	
97-AFC-1C	
DATE	April 20 2009
RECD.	April 20 2009

DATE: April 20, 2009

TO: Interested Parties

FROM: Steve Munro, Compliance Project Manager

SUBJECT: **High Desert Power Project (97-AFC-01C)**
Staff Analysis of Proposed Modifications to Remove the Prohibition of the Use Of Recycled Water for Project Operations

California Energy Commission staff has issued the enclosed Staff Analysis (SA) for a 30-day public review period. The SA is an assessment of the Petition to Amend, which was submitted on August 12, 2008, by High Desert Power Project, (HDPP) LLC. The petition requests removal of the prohibition in Condition of Certification (COC) SOIL and WATER (S&W)-1 prohibiting the use of recycled water for project operations. HDPP's petition also proposes a transition from freshwater to recycled water for power plant cooling, with a corresponding revision of water banking requirements in S&W-4 to reflect recycled water use.

The High Desert Power Project is an 830 MW combined cycle power plant located in the City of Victorville in San Bernardino County. The project was certified by the Energy Commission on May 3, 2000, and began commercial operation on April 22, 2003.

The proposed modifications would allow HDPP to make the following changes:

- The project owner has requested that the Energy Commission modify COC S&W-1 to remove the prohibition of the use of recycled waste water to supplement or replace the power plant's current potable water supply for project operations.
- HDPP also proposes that the Calculated Water Bank Reserve amount (as shown in the Table of Milestones for Calculated Water Bank Reserve in COC S&W-4d) be reduced by a percentage equal to the proportion of recycled waste water that could be used for power plant operation.

Energy Commission staff reviewed the petition and assessed the impacts of this proposal on environmental quality, public health and safety. Staff concurs with the proposal to modify COC S&W-1 to remove the prohibition against the use of recycled water and proposes to revise the condition as requested. With regard to COC Soil and Water-4, staff believes it is premature to modify that condition at this time because a full analysis of recycled waste water use and related delivery infrastructure (i.e., a pipeline) is not currently available. It is staff's opinion that, with the implementation of revised COC S&W-1, the project will remain in compliance with applicable laws, ordinances, regulations, and standards and that the proposed modifications will not result in a significant adverse direct or cumulative impact to the environment (Title 20, California Code of Regulations, Section 1769).

The SA and the amendment petition have been posted on the Energy Commission web site at the following web address:

http://www.energy.ca.gov/sitingcases/highdesert/compliance/index.html. A Staff Workshop may be scheduled, if necessary, to address concerns from the public review process.

The Energy Commission's Order (if approved) will also be posted on the website. Energy Commission staff intends to recommend approval of the petition at a regularly scheduled Business Meeting of the Energy Commission. If you have comments on this proposed modification, please submit them to me at the address below prior to 5:00 p.m. on May 19, 2009.

Steve Munro, Compliance Project Manager
California Energy Commission
1516 9th Street, MS-2000
Sacramento, CA 95814

The Energy Commission encourages comments by e-mail. Please include your name or your organization's name in the e-mail. Those submitting attachments via e-mail should provide them in either Microsoft Word format, or in Portable Document Format (PDF), to: smunro@energy.state.ca.us.

If you have any questions, please contact me at (916) 654-3936.

Enclosure
Mail List: 707

HIGH DESERT POWER PROJECT (97-AFC-1C)

STAFF ANALYSIS OF PETITION TO AMEND CONDITIONS OF CERTIFICATION SOIL & WATER-1: PROHIBITION OF USE OF RECYCLED WASTE WATER, AND SOIL & WATER-4: WATER-BANKING

Prepared by Casey Weaver

April 16, 2009

SUMMARY OF CONCLUSIONS

The proposed amendment to the existing High Desert Power Project (HDPP) would not result in any significant adverse environmental impacts, and would comply with applicable laws, ordinances, regulations, and standards (LORS), if the project complies with existing conditions of certification and staff's proposed changes and additions to the existing conditions of certification are implemented.

EXISTING PROJECT DESCRIPTION AND BACKGROUND

HDPP is an 830 megawatt natural gas-fired combined-cycle facility located in the City of Victorville, in San Bernardino County. The power plant, owned by Constellation Energy Group, has been operational since April 2003.

The water supply for HDPP is surface water purchased from the City of Victorville, obtained from the State Water Project (SWP) through an agreement with Mojave Water Agency (MWA). Since this water supply is interruptible, the project owner also maintains a groundwater bank consisting of surplus water that is injected into the underlying aquifer for retrieval when SWP water is unavailable.

Several petitions to amend the Soil and Water conditions of certification have been submitted since project approval in 2000. The initial petition, submitted on September 30, 2005, has been supplemented and revised with additional information that was submitted by HDPP on November 28, 2005 (HDPP 2005c), December 5, 2005 (HDPP 2005d), March 10, 2006 (HDPP 2006a), March 16, 2006 (HDPP 2006b), May 26, 2006 (HDPP 2006c) and August 12, 2008 (HDPP 2008a). This staff assessment addresses the August 12, 2008 petition.

The Lahontan Regional Water Quality Control Board (RWQCB) specifies the maximum TDS concentration allowed to be injected into the regional aquifer. When SWP water has been available for purchase and banking, the project owner has had difficulty banking the water due to the high TDS in the available water. In addition, over the past two to three years the SWP water deliveries

have been significantly reduced due to drought conditions and environmental restrictions on pumping from the Sacramento-San Joaquin Delta.

Current deliveries of SWP water have been cut back substantially (85 percent reduction). This cutback currently allocates 1,278 AFY for use by HDPP. With a maximum water use of 4,000 AFY for power plant operation, HDPP will require extraction of 2,722 AFY from the water bank. As of October 2008, there was 3,084 AF of banked water available for HDPP use.

The SWP water is provided to HDPP via a contract with the City of Victorville. The contract allocates a maximum of 8,000 AFY to HDPP. As HDPP will continue to consider the banked water as their backup water supply, they will need to resupply the bank (inject water) at times when SWP water is available in excess of their operational needs.

Given the current allocation of SWP water available to HDPP, there is no ability for HDPP to inject more water into the bank and the backup water supply is likely to run out within 18 months. With the reduction of water available through the SWP, HDPP is at risk of being required to significantly limit or even shut down plant operation within the next two years and beyond.

Proposed Amendments

The purpose of HDPP's current Petition to Amend is to remove the prohibition contained in the Commission's HDPP Decision regarding the use of recycled wastewater from Victor Valley Wastewater Reclamation Authority (VVWRA) for cooling (**SOIL & WATER – 1**). HDPP is also requesting a transition to recycled water provided by VVWRA and a related revision to its water banking schedule that reflects a decrease in the annual injection volume based on the use of recycled waste water (**SOIL & WATER - 4**). HDPP seeks to supplement SWP delivered water with recycled waste water from VVWRA to increase the reliability of water available for plant needs and to comply with Energy Commission policy to use the lowest quality water available.

The project owner has requested that The Energy Commission modify Condition of Certification **SOIL & WATER- 1** to allow the use of recycled waste water to at least supplement the power plant's water supply. In the Final Commission Decision (CEC 2000), Condition of Certification **SOIL & WATER- 1d** prohibited the use of treated water from the VVWRA for reasons that are explained in the following analysis.

HDPP proposes that, if the Energy Commission approves the requested use of recycled waste water, the Calculated Water Bank Reserve amount (as shown in the Table of Milestones for Calculated Water Bank Reserve in **SOIL & WATER-4d**) be reduced by a percentage equal to the amount of recycled waste water used for power plant operation.

LAWS, ORDINANCES, REGULATIONS AND STANDARDS (LORS) COMPLIANCE

The LORS cited in the original project's Final Commission Decision (CEC 2000), apply to the activities to be undertaken under the proposed amendment and are therefore incorporated here by reference. Staff also adds the following regulation to the applicable LORS.

Soil and Water Amendment Table 1
Laws, Ordinances, Regulations, and Standards (LORS)

Applicable Regulation	Description
State	
California Water Code Article 7, Section 13552.6	States in part that the use of potable water for cooling towers is a waste or an unreasonable use of water within the meaning of Section 2 of Article X of the California Constitution, if recycled water is available to the user.

ANALYSIS

In assessing the impacts of the proposed amendment elements, staff reviewed the project's Final Commission Decision (CEC 2000), subsequent amendments, and information provided by the project owner in support of the proposed amendments.

The scope of staff's analysis was to evaluate the two project changes requested in the petition for amendment. The first change to be evaluated (revision to Soil & Water – 1d.) is whether the removal of the prohibition to use recycled water from VVWRA would cause any potentially significant impacts. The second change to be evaluated is whether the requested transition to recycled water use and related reduction in the water-banking schedule would cause any potentially significant impacts that are substantially different than those impacts caused by the project as initially certified in 2000 and amended in 2006. Staff also evaluated whether both changes would be consistent with applicable LORS. Where there were potential impacts or LORS compliance was required, staff proposed appropriate mitigation and changes to the conditions of certification.

SOIL&WATER-1 currently prohibits the use of "treated water from the Victor Valley Wastewater (Reclamation) Authority" (VVWRA). This prohibition was required because, at the time of certification, California Department of Fish and Game (CDFG) was concerned that use of VVWRA waste water as a project water supply would reduce surface flows in the Mojave River. CDFG believed

these reduced flows would affect riparian resources and result in significant environmental impacts. Therefore, to ensure there would be no impacts, staff agreed to add this specific prohibition as a condition of certification. Recognizing that the need for this prohibition was CDFG's concern that an adequate volume of waste water be maintained to protect riparian resources, staff focused its analysis on whether there would be additional waste water available for HDPP's use given the MOU requirements and other current and proposed future obligations for recycled waste water.

Since HDPP project certification in 2000, the Victorville area has continued to grow, creating additional waste water. It appears that with this additional growth, VVWRA has been able to satisfy CDFG concerns. In 2003, CDFG and VVWRA executed a Memorandum of Understanding (MOU) which specifies waste water discharge requirements VVWRA must maintain to ensure there will be no impacts to riparian resources in the Mojave River. The MOU also includes a provision that requires VVWRA to discharge a portion of future increases in waste water volume to the river.

In 2008, the Energy Commission certified the City of Victorville's Victorville 2 Hybrid Power Project (Victorville 2). This project was licensed to use 3,150 AFY of recycled waste water from VVWRA. Data used by staff in the Victorville 2 case (CDFG 2003, VV2, 2007, VVWRA 2004) and additional data provided by HDPP and VVWRA (March, 2009), was used to construct **Table 1- Wastewater Volume and Use – 2008 Data** shown below. **Table 1** shows the current and projected volumes of waste water and the balance available given current obligations for use of the waste water supply.

Table 1- Wastewater Volume and Use – 2008 Data

Total VVWRA Effluent (AF) Secondary and Tertiary Treated Waste Water	Required Waste Water Discharge (AF) per CDFG MOU	VV2 Projected Tertiary Treated Waste Water Needs (AF)	Westwinds Golf Course Tertiary Treated Waste Water Use (AF)	Waste Water Available for Other Uses (AF)
13,776	9,677	3,150	352	597

The waste water treatment plant operated by VVWRA produces and discharges two waste water streams. One stream is treated to tertiary standards, disinfected and is either conveyed to Westwinds Golf course for landscape irrigation or dechlorinated and discharged directly to the Mojave River. The other stream is treated to secondary standards and conveyed to percolation ponds for disposal without disinfection. Staff understands both of these supplies ultimately contribute flows to the Mojave Narrows. CDFG has indicated (ROC, 2009) waste water percolated from the ponds is credited towards the required discharge and is consistent with the terms of the MOU.

As shown in **Table 1**, the combined volumes of effluent treated and discharged appear to be sufficient to satisfy current obligations for treated waste water use. It also appears that there would be sufficient volume of effluent (provided appropriate treatment is accomplished) to meet future obligations for Victorville 2 and still provide 597 AFY for HDPP needs.

Since certification of Victorville 2, the city of Victorville has decided to sell the certified project and, subsequently, progress on project development has slowed significantly. The time necessary for acquisition and construction of the project could be on the order of 2 to 3 years. This situation suggests that the waste water supply dedicated to Victorville 2 may be available for interim use by HDPP while the Victorville 2 project is developed. In addition, by the time Victorville 2 is developed, it is likely that additional waste water will become available as the Victorville area continues to grow and VVWRA 's treatment capacity similarly increases. This would make additional waste water available for use that could meet all or a portion of HDPP's needs.

Staff does not believe that use of recycled waste water for HDPP operations would cause or contribute to adverse environmental impacts if the proposed revision to the condition of certification is implemented.

The project owner does not currently have an agreement with the City of Victorville for delivery of this water or a RWQCB permit for its use. In order for the project owner to obtain recycled waste water for power plant use, the prohibition included in condition of certification **SOIL & WATER- 1** must be removed. Staff believes that, due to proposed VVWRA expansion, an additional supply of recycled waste water is reasonably foreseeable and that it is likely the project owner can negotiate an agreement for delivery and obtain a permit for its use once the additional supply becomes available.

Staff believes that allowing the project owner to pursue a recycled waste water supply for power plant cooling is appropriate because it is a more environmentally desirable alternative to using SWP water and is consistent with Energy Commission policy. Reducing or replacing project use of freshwater would also be consistent with section 13552.6 of the California Water Code (Water Reuse) which states in part, "the use of potable domestic water for nonpotable uses...is a waste or an unreasonable use of the water within the meaning of Article X, section 2 of the California Constitution if recycled water is available..." . Staff has proposed revisions to condition of certification **SOIL & WATER- 1** to ensure compliance with Energy Commission water policy and section 13552.6 of the California Water Code.

Staff concurs with the project owners request to amend Condition of Certification **SOIL & WATER- 1** and has proposed additional revisions to ensure all recycled water reasonably available will be used for project operation.

As discussed above, the SWP deliveries can be significantly reduced during drought conditions or by environmental restrictions on Delta pumping. Therefore, HDPP's primary water supply is an interruptible supply. Accordingly, certification of the project required that HDPP obtain a backup water supply to provide water to the project during interruptions of the primary supply. Because the Mojave groundwater basin is over drafted and no existing groundwater reserves are available, HDPP was permitted to establish a groundwater bank to provide a backup water supply. SWP water quality (especially TDS) varies throughout the year. In addition to other water quality parameters, the RWQCB limits the level of TDS in water that is injected into aquifers. At times, the TDS concentration in SWP water exceeds the limits allowed for injection and, without treatment, cannot be used for water banking purposes. With the current reduction in deliveries of SWP water due to existing drought conditions and the variable water quality of the water available for banking purposes, the viability of the groundwater bank is in question.

As designed, the groundwater bank is to be developed and then used on an as-needed basis when deliveries of SWP water are restricted. In accordance with **SOIL&WATER- 4**, HDPP must eventually establish a water bank with a volume equivalent to the volume of water expected to be used by HDPP over a three year period of operation plus 1,000 AF. The volume of this banked water supply is based on the estimated maximum use of back up water required during a contiguous three year period when SWP water would be unavailable (3 years x 4,000 AFY) plus 1,000 AF.

The amount of banked groundwater available to the project is defined as the amount of water injected by HDPP minus groundwater extracted by the project, minus groundwater dissipation, minus 1,000 acre-feet. Groundwater dissipation is defined as the groundwater discharged to the Mojave River that was supplied to the aquifer by the project's injection operations. Dissipation varies according to the rate of injection and the total period over which water is stored in the aquifer following decommissioning of the project. 1,000 acre-feet of water would be left in the aquifer to buffer any potential environmental impacts that might occur if the water bank dissipation was underestimated.

The project owner currently has no commitment for supply and delivery of recycled waste water, a use permit or the water quality characterization necessary to design the project changes. Therefore, there is insufficient information for staff to analyze project impacts and identify which LORS would be required for project compliance. The project owner's proposed changes to **SOIL & WATER - 4** presume recycled waste water is available and the plant has been modified for use. Staff believes it is premature to modify **SOIL & WATER-4** as proposed because a full analysis of recycled waste water use cannot be performed at this time. The project owner has indicated they plan to submit another petition to amend the project when they know more about the recycled waste water supply and water quality characteristics and have designed the necessary plant modifications.

When this information becomes available, staff believes this would be the appropriate time to modify or eliminate **SOIL & WATER- 4** depending on the supply and design. Staff also believes that future analysis and design should include use of recycled waste water for all project operational needs. This would be consistent with Energy Commission water policy and Water Code Section 13550.

Staff realizes that if the project owner does not inject sufficient water to comply with the water banking goals identified in **SOIL & WATER- 4d**, the project owner may be required to construct a pre-injection reverse osmosis treatment system. Staff believes the intent of this requirement was based on the need to meet water quality requirements for the injected water. However, staff believes that where no water is available for treatment, the project owner should not be mandated to comply with the requirement for constructing and operating a treatment system.

While it is unrealistic to hold HDPP to the annual schedule as detailed in **SOIL & WATER- 4** due to current SWP water availability, the cumulative volume needs to be established as soon as possible. Until a recycled waste water supply is identified and obtained for use by HDPP, HDPP must attempt to comply with the existing schedule as stated in **SOIL & WATER- 4d**. Following connection to the recycled waste water supply line, the injection schedule may be modified by recalculating the volume of injection required, based on the volume of recycled waste water used in power plant operations in accordance with proposed condition of certification **SOIL & WATER- 4e**.

CONCLUSIONS

HDPP has proposed that the prohibition from using treated waste water from VVWRA be removed. This request is aligned with the goals and strategic objectives of the State of California and is consistent with Energy Commission policy that requires the use of alternative water supply sources and alternative technologies unless they prove to be environmentally undesirable or economically unsound. While the prohibition names VVWRA specifically, Energy Commission staff encourages HDPP to obtain and use recycled waste water obtained from VVWRA or other sources. Staff believes the applicant should also seek the maximum amount of recycled water available so all or most of the freshwater use can be replaced. Staff anticipates that HDPP will file another petition to amend when an alternate water supply is identified and more information on necessary project changes can be provided. Staff will then determine whether changes to **SOIL & WATER- 4** are appropriate and whether other conditions should be added or deleted.

Staff proposes condition of certification **SOIL & WATER- 1** be changed to address compliance with the Energy Commission Water Policy.

PROPOSED MODIFICATIONS TO CONDITIONS OF CERTIFICATION

Staff recommends the following changes to the Conditions of Certification **SOIL & WATER- 1** (additions shown by underline, deletions by ~~strikeout~~):

SOIL&WATER-1 ~~The only~~ ~~w~~Water used for project operation (except for domestic purposes) shall be State Water Project (SWP) water obtained by the project owner consistent with the provisions of the Mojave Water Agency's (MWA) Ordinance 9 and/or appropriately treated recycled waste water.

a. Whenever SWP water is available to be purchased from ~~MWA~~ the city of Victorville, or recycled waste water is available, the project owner shall use direct delivery of such water for project operation.

b. Whenever water is not available to be purchased from the MWA the project owner may use SWP water banked in the seven HDPP wells identified in Figure Number 1 of the Addendum Number 1 to the "Evaluation of Alternative Water Supplies for the High Desert Power Project" (Bookman-Edmonston 1998) as long as the amount of water used does not exceed the amount of water determined to be available to the project pursuant to **SOIL&WATER-5.**

c. If there is no water available to be purchased from the MWA and there is no banked water available to the project, as determined pursuant to **SOIL&WATER-5**, no groundwater shall be pumped, and the project shall not operate. At the project owner's discretion, dry cooling may be used instead, if an amendment to the Commission's decision allowing dry cooling is approved.

~~d. The project shall not use treated water from the Victor Valley Wastewater Authority.~~

e. The project's water supply facilities shall be appropriately sized to meet project needs~~.~~ and to make maximum use of recycled waste water for power plant cooling needs. Prior to use of recycled waste water the project owner shall provide the CPM with a specific amendment petition providing details of the recycled water pipeline and connections, a copy of an agreement with VVWRA or other suppliers that will deliver

recycled waste water, and any other information necessary to amend the project for the proposed recycled waste water use.

Verification: The project owner shall provide final design drawings of the project's water supply facilities to the CPM, for review and approval, thirty (30) days before commencing project construction.

Verifying compliance with other elements of Condition **SOIL&WATER-1** shall be accomplished in accordance with the provisions of the Verifications for Conditions 2, 3, and 6, as appropriate.

REFERENCES

CDFG (California Department of Water Resources) –VVWRA (Victor Valley Wastewater Reclamation Authority). 2003. Memorandum of Understanding (MOU) by and between the California Department of Fish and Game and the Victor Valley Wastewater Reclamation Authority regarding the Discharge to the Mojave River Transition Zone. June 27, 2003.

CEC (California Energy Commission). 2000. Final Commission Decision for the Application of Certification for the High Desert Power Project, Docket No 97-AFC-1. May 2000.

DWR (California Department of Water Resources). 2006. Internet Website for the State Water Project, Operations and Maintenance, Current Automated Station Data: http://wwwomwq.water.ca.gov/AutoStationPage/index.cfm and Historic Automated Station Data: http://wwwomwq.water.ca.gov/AutoStationPage/HistoricASPage/index.cfm Accessed on March 31, 2006.

HDPP (High Desert Power Project). 2001. Report of Waste Discharge and Antidegradation Analysis for the Proposed High Desert Power Project, Groundwater Banking Operation, Victorville, California. May 2001.

HDPP (High Desert Power Project). 2004. Letter from Stephen B. Gross, representing High Desert Power Project LLC, to Harold Singer, representing the Lahontan Regional Water Quality Control Board. Subject: Aquifer Banking System Issues, High Desert Power Project, LLC. September 21, 2004.

HDPP (High Desert Power Project). 2005a. Email from Steve Shulder, representing High Desert Power Project LLC, to Steve Munro of the California Energy Commission and Linda Bond of LDBond & Associates. Subject: Ground Water Modeling Study. October 7, 2005.

HDPP (High Desert Power Project). 2005b. Letter from Antonio D. Penna Jr., representing High Desert Power Project LLC, to Steve Munro of the California Energy Commission. Subject: Petition for Revisions/Administrative Changes to Soil & Water–4, Commission Decision (97-AFC-1C), High Desert Power Project, LLC. September 30, 2005.

HDPP (High Desert Power Project). 2005c. Email from Steve Shulder, representing High Desert Power Project LLC, to Steve Munro of the California Energy Commission and Linda Bond of LDBond & Associates. Subject: HDPP Petition to amend Soil & Water 4. November 28, 2005.

HDPP (High Desert Power Project). 2005d. Email from Steve Shulder, representing High Desert Power Project LLC, to Steve Munro of the California Energy Commission and Linda Bond of LDBond & Associates. Subject: Assumptions and parameters for revised water banking plan. December 5, 2005.

HDPP (High Desert Power Project). 2005e. Letter from Ramiro R. Garcia, representing High Desert Power Project LLC, to Rebecca Jones and Curt Taucher, representing the California Department of Fish and Game. Subject: Request for Revisions to Incidental Take Permit (No. 2081-1999-050-6) High Desert Power Project. December 6, 2005.

HDPP (High Desert Power Project). 2006a. Letter from Ramiro R. Garcia, representing High Desert Power Project LLC, to Steve Munro of the California Energy Commission. Subject: Addendum 1 Petition for Revisions/Administrative Changes to Soil & Water–4, Commission Decision (97-AFC-1C), High Desert Power Project, LLC. March 10, 2006.

HDPP (High Desert Power Project). 2006b. Letter from Ramiro R. Garcia, representing High Desert Power Project LLC, to Steve Munro of the California Energy Commission. Subject: Addendum 2 Petition for Revisions/Administrative Changes to Soil & Water–4, Commission Decision (97-AFC-1C), High Desert Power Project, LLC. March 16, 2006.

HDPP (High Desert Power Project). 2009. Letter from M. Fred Strauss, representing High Desert Power Project LLC, to Steve Munro of the California Energy Commission. Subject: Petition for Modification to Use Reclaimed Water, Response to March 4, 2009 Email and Data Requests, Commission Decision (97-AFC-1C), High Desert Power Project, LLC. March 13, 2009.

MBAW-VVWD (Mojave Basin Area Watermaster and Victor Valley Water District). 2002. Storage Agreement Between Mojave Basin Area Watermaster and

Victor Valley Water District. June 1, 2002.

ROC (Record of Conversation). 2009. Summary of conversation between Steve Munro of the California Energy Commission and Tom Bilhorn, hydrology consultant to California Department of Fish and Game (DFG), regarding interpretation of Memorandum of Understanding between DFG and Victor Valley Wastewater Reclamation Authority. March 4, 2009.

RWQCB (Lahontan Regional Water Quality Control Board). 2002. Regional Water Quality Control Board, Lahontan Region, Conditional Waiver of Waste Discharge Requirements, Resolution NO. R6V-2002-0010 WDID NO. 6B360105004 for Victor Valley Water District and High Desert Power Project Limited Liability Corporation, High Desert Power Plant – Groundwater Banking Operation. February 14, 2002.

RWQCB (Lahontan Regional Water Quality Control Board). 2004. Letter from Harold Singer, representing the Lahontan Regional Water Quality Control Board, to Stephen B. Gross, representing High Desert Power Project LLC. Subject: Response to Aquifer Banking System Issues - High Desert Power Plant – Victorville, San Bernardino County. November 30, 2004.

VV2 (Victorville 2 Hybrid Power Project). 2007. Application for Certification to the California Energy Commission. February 27, 2007.

VVWRA (Victor Valley Wastewater Reclamation Authority). 2004. Victor Valley Wastewater Reclamation Authority, Victor Valley,Wastewater Subregional Facilities Draft Program EIR/EIS. August 12, 2004.