

# Memorandum

**Date** : March 25, 1998

**To** : Jananne Sharpless, Presiding Member  
Robert A. Laurie, Associate Member

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**File** : MEMO003.WPD

**From** : **California Energy Commission** - Richard K. Buell  
1516 Ninth Street Siting Project Manager  
Sacramento 95814-5512

**Subject** : **High Desert Power Project (97-AFC-1) Status Report Number Two**

In staff's "Issues Identification Report," December 31, 1997, we identified "significant" issues in six areas. The purpose of this memorandum is to provide you with an update on the resolution of the issues identified in staff's report and to identify new issues that have arisen since the March 3, 1998 scheduling Conference. In addition, the Committee's March 18, 1998 order directed staff to provide additional information on: 1) the scope of the transmission interconnection study and whether this scope is sufficient to address the three configurations under consideration; and 2) staff's proposed outline for the Preliminary Staff Assessment (PSA). This memorandum will also address these informational requests of the Committee and discuss the implications of recent events on project schedule.

## STATUS OF ISSUE RESOLUTION

### AIR QUALITY

#### Turbine Manufacturer's Data

In staff's February 27, 1998 "Response of Commission Staff to Committee Scheduling Order", we recommended that the staff prepare an analysis of the environmental implications of each of the three project configurations proposed by the applicant. This was based on the belief that the applicant had provided sufficient turbine manufacturer data on each of the configurations for a complete analysis.

During pre-filing the applicant orally identified four potential turbine manufacturers for the project; i.e., General Electric, Westinghouse, Brown Boveri and Siemens. However, the AFC provided limited emission data for the turbines under consideration (i.e., General Electric 7FA turbine for the 832 MW simple cycle configuration and 720 MW combined cycle configuration, Westinghouse 501F turbine for the 832 MW simple cycle configuration and 720 MW combined cycle configuration, and Westinghouse 501G turbine for the 678 MW combined cycle configuration). At the February 25, 1998 workshop the applicant once again asserted that they wanted to be able to purchase from any one of the four turbine manufacturers.

The information provided to the Mojave Desert Air Quality Management District (District) in the Authority to Construct (ATC) permit application (November 17, 1997) provided information for two turbines, General Electric 7FA turbine data for the 832 MW simple cycle and 720 MW combined cycle configurations and the Westinghouse 501G turbine data for the 678 MW combined cycle configuration. The ATC application also noted that this data was provided for "analysis purposes". We also note that the information provided in the applicant's March 18, 1998 offset plan to the District is based on the General Electric 7FA and Westinghouse 501G turbine options.

On December 17, 1997, staff submitted data request numbers 9, 10, and 11 which asked for additional turbine manufacturer data to substantiate the "worst-case" emissions presented in the AFC. The applicant's January 15, 1998 responses to these data requests implied that specific turbine manufacturers data would not be provided until a decision had been made on which configuration to construct and which manufacturer would supply the project (i.e., post certification). In addition, the data responses did not provide enough information for staff to understand how the AFC "envelope" emission data were calculated.

Staff began its analysis based information provided in the AFC, although staff has been unable to validate how the applicant made these estimates. Staff is currently evaluating General Electric and Westinghouse manufacturer data provided by Calpine for the Sutter Power Project (97-AFC-2) as a possible source of data. Staff is also contacting the four turbine manufacturers identified by the applicant to obtain information on the emissions from these turbines.

It is staff's normal practice to analyze the environmental consequences from each turbine manufacturer under consideration by the applicant, unless the emissions are sufficiently similar (within 1-10%) to warrant a single analysis. Staff believes that the information presented in the Sutter Power Project case is sufficient to conduct its analyses.<sup>1</sup> However, we have not yet obtained sufficient information on the Brown Boveri and Siemens turbine options to conduct an analysis of these turbine options or to assume that the emissions from these turbines are "sufficiently similar" to warrant a single analysis.

### **Staff Position and Recommendation**

Staff understands the applicant's desire for flexibility but also believes its expectations are unreasonable given the lack of data provided. Staff does not believe it necessary for the applicant to select a specific turbine manufacturer or turbine model at this time. However, staff needs the emission data for each turbine model under consideration in order to conduct its analysis. Staff is willing to conduct an analysis of the three

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<sup>1</sup> Staff will submit to the proof of service list its recommendation on emission factors to be used for these turbine manufacturers, and identify the source of that information.

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turbines discussed in the AFC, but reluctant to assume that the emissions from the Brown Boveri and Siemens turbine options are "sufficiently similar" to the three turbines discussed in the AFC to presume that the PSA analysis will address the likely environmental consequences of these turbines. Therefore, at this time, staff only plans on conducting analyses for the turbines for which it has data (i.e., General Electric 7FA turbine for the 832 MW simple cycle configuration and 720 MW combined cycle configuration, Westinghouse 501F turbine for the 832 MW simple cycle configuration and 720 MW combined cycle configuration, and Westinghouse 501G turbine for the 678 MW combined cycle configuration).

### **Best Available Control Technology (BACT)**

Staff is continuing to explore potential BACT issues associated with the High Desert Power Project proposal. Staff notes that both the applicant and staff attended a workshop scheduled by the South Coast Air Quality Management District to discuss BACT for combustion turbines under the South Coast Air Quality Management District's jurisdiction. Staff presented information on nitrogen oxide emission limitations and actual emissions rates being obtained by projects previously licensed by the Energy Commission. Staff did not discuss the merits of the applicant's BACT proposal. Staff also notes that it was invited to a meeting on March 25, 1998 between the Air Resources Board, District staff, and applicant to discuss BACT. Staff attended the meeting as an observer.

### **Air Emission Reduction Credits**

In November 17, 1998 the District sent a letter to the applicant stating that the application to the District was complete. However, the District also indicated that it would need additional information from the applicant on its offset proposal by March 19, 1998. On December 17, 1997 staff issued data request numbers 13 through 18 requesting detailed information on the applicant's offset proposal. On March 18, 1998 the applicant submitted an offset plan to the District. The March 18, 1998 submittal contains: 1) a summary of the project's offset liability (based on two of the three turbines described in the AFC, the General Electric 7FA turbine and Westinghouse 501G turbine); 2) identification (i.e., name of the source owner, quantity of reductions that may be obtained, general description of the reduction method, and general location) of more than 300% of potential nitrogen oxide (NOx) offsets needed; 3) identification of more than 500% of potential volatile organic compounds (VOC) offsets needed; 4) identification of more than 500% of potential particulate matter less than 10 microns (PM10) offsets needed; and 5) a letter from Mitsubishi Cement Corporation identifying its willingness to sell an unspecified amount of NOx offsets to the applicant at mutually agreeable terms of sale.

The applicant's March 18, 1998 submittal to the District did not address staff's data requests. In those requests, staff asked the applicant to describe, in as much detail as

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possible, the strategies that it plans to use to secure offsets for the project, as well as any progress made to date in securing the emission reduction credits. Specifically, for nitrogen oxides (NOx), staff asked the applicant to identify whether offsets would be obtained from the identified cement plants, and if so, to identify the quantity of emission reduction credits to be purchased from each of the facilities, the methods to be used to achieve the emission reductions, source tests or other data to substantiate the emission reductions identified in the AFC, and letters of intent or other binding agreements with source owners.

With respect to particulate matter less than 10 microns (PM10) emission reduction credits that are obtained from paving or treating of unpaved roads, staff asked the applicant to provide detailed descriptions of the locations and lengths of roads to be treated (paved or treated with dust suppressants), the methods to be used to reduce emissions from unpaved roads, and a schedule for the work to be performed. Staff also requested a protocol of the methods to be used to evaluate the road emission reductions based on vehicle count, type of vehicles, estimated vehicle weight, and vehicle speeds, and a protocol to be used to collect dust samples from the unpaved road and the method to be used to estimate the dust's silt content.

For PM10 emission reductions that are obtained from the District's ERC bank, staff asked for a list of offsets that the applicant is considering for purchase, letters of intent or other binding agreements, and a schedule for acquiring the emission reduction credits from each of the source owners.

For emission reductions obtained from the South Coast Air Basin, staff asked for a detailed description of the location and quantity of emission reductions available for each source of offsets and letters of intent or other binding agreements to purchase such offsets.

Staff notes that the District never specified what information it needs to conduct its analysis of the applicant's offset package (see the November 19, 1997 letter from Charles Fryxell, APCO, to Richard L. Wolfinger). Staff has reviewed District rules and notes that Rule 1302 (C)(3) "Determination of Offsets", part (b) states "[u]pon receipt of the notification [from the district regarding specific amount and type of offset required], the applicant shall provide the APCO a proposed Offset package which contains evidence of Offset eligibility for use pursuant to the provisions of District Rule 1305." District Rule 1305 provides the procedures and formulas to determine the eligibility of, calculate the amount of, and determine the use of Offsets. District Rule 1304 describes the emission calculation methods to be used by the District. Staff believes that Rules 1304 and 1305 would typically require information similar to that contained in staff's data requests numbers 13 through 18.

District Rule 1302 (C)(3)(b)(iii) also states "[a]fter determining that the Offsets are real, enforceable, surplus, permanent and quantifiable and after any permit modifications

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required pursuant to District Rule 1305 or Regulation XIV have been made, the APCO shall approve the use of the Offsets subject to the approval of CARB and USEPA during the comment period required pursuant to subsection (D)(2) below.” As the comment period referred to is that which follows the issuance of the preliminary Authority to Construct (ATC), staff interprets this rule to mean that the District needs to determine the eligibility of the offsets prior to the ATC or, in this case, prior to the Preliminary Determination of Compliance (PDOC).

Finally, the Warren Alquist Act addresses offset information -- Public Resources Code section 25523 (d)(2) states “[t]he commission may not find that the proposed facility conforms with applicable air quality standards pursuant to paragraph (1) unless the applicable air pollution control district or air quality management district certifies that complete emission offsets for the proposed facility have been identified and will be obtained by the applicant prior to the commission’s licensing of the project ...” The applicant’s March 18, 1998 offset plan acknowledges this requirement, and states that “HDPP will obtain letters of intent, option agreements, or other binding agreements to secure adequate ERCs for the project within the CEC licensing schedule for this project.”

Based on the applicant’s March 18, 1998 offset plan, staff is unclear whether or when the applicant intends to provide the information requested in staff’s data request numbers 13 through 18. Staff believes that this information needs to be provided soon enough to allow: 1) staff, and other parties, the opportunity to provide meaningful review and comments on the District’s PDOC and FDOC; and 2) staff, and other parties, to conduct environmental analysis of the proposed mitigation for the project. Staff believes this information and analysis will be useful to the Energy Commission in making the findings required under the California Environmental Quality Act and Warren Alquist Act.

There are three specific components of the environmental analysis for which this information is required. First, staff believes it necessary to analyze the proposed mitigation measures to ensure that implementation of these measures will not result in any direct or secondary environmental impacts. For example, it has been suggested that NOx ERCs may be provided from the Mitsubishi Cement Corporation plant by burning tires (along with coal that is currently burned) in the facility to reduce NOx emission levels. Staff believes that the environmental documentation for this project needs to describe the potential public health impacts of the toxic emissions from the proposed tire burning. However, the applicant’s March 18, 1998 offset plan does not include a detailed description of how emission reductions will be achieved at the Mitsubishi Cement Corporation plant, or for any other offset source identified.

Second, staff believes that its analysis should demonstrate the nexus between a project’s impacts and the measures proposed to mitigate those impacts. In the area of air quality, this portion of the analysis can be challenging, because it must include

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consideration of the effect of the district's programmatic efforts to achieve and maintain criteria pollutant levels below the state and federal ambient air quality standards. Nonetheless, staff believes it is important for the Commission to have before it not only the information the District requires for permitting but also information on what the project-specific effects under the District air quality program may be. Without the information requested in staff's data request numbers 13 through 18 (i.e. specific offset sources), staff can not provide this analysis in either the PSA or Final Staff Assessment (FSA).

Third, staff also believes the Energy Commission needs to assess whether the mitigation is likely to occur. Without information on the source test data from the offset sources and detailed information describing the methods of emission reductions, staff does not believe that it, nor any other party (including the District), can conclude that the proposed mitigation is likely to occur.

### **Staff Position and Recommendation**

Staff finds itself in a difficult position -- on the one hand it is missing critical data needed to conduct its analysis; on the other hand we do not wish to inadvertently interfere with negotiation between the applicant and potential offset sources. Staff is not certain that it necessarily has identified all the options that may exist to pursue resolution of this issue. Staff will schedule a workshop, within the first two weeks of April, to discuss this issue and possible options to resolve staff's concerns. Staff will advise the Committee shortly after the workshop on its recommendations to resolve this issue.

### **LAND USE**

Based on information provided in applicant's January 16, 1998 response to Data request numbers 37 and 38, staff has conducted a preliminary analysis of whether the proposed stacks intrude into the "imaginary horizontal surface" defined under Federal Aviation Administration regulations. Staff's analysis indicates the stacks may exceed the imaginary horizontal surface by 35 feet. Staff has contacted the FAA and Cal-Trans Division of Aeronautics, Christa Engle, to further explore this potential issue. Staff has also contacted Mr. Welch, High Desert Power Project Director, on March 11, 1998 to inform the applicant of our preliminary calculations (see the report of conversation docketed on March 11, 1998). Mr. Welch indicated the applicant was providing, at the request of the FAA, additional information regarding the thermal and visible plumes from the project. Staff also suggested that the applicant reexamine their calculation of whether the project's stack intruded into the imaginary horizontal surface.

Staff also notes that on March 12, 1998, California Unions for Reliable Energy (CURE) sent a letter to Mickeal Agaibi of the FAA identifying three concerns regarding the proposed project at the Southern California International Airport; i.e., intrusion into the

horizontal surface, thermal plumes from exhaust stacks, and fog clouds from the cooling tower. Staff has previously identified the latter two of these concerns in its "Issue Identification Report" and February 27, 1998 status report. Staff is awaiting the information regarding these plumes the applicant has promised FAA.

## **TRANSMISSION SYSTEM ENGINEERING**

### **STATUS OF TRANSMISSION LINE ANALYSES**

On March 16, 1998 the applicant provided its responses to staff's data request numbers 108 through 110. Applicant response to staff's data request number 77 regarding stability analyses is due April 22, 1998, as part of Southern California Edison Company's (Edison) interconnection study. See the discussion below regarding the interconnection study scope for additional information.

As previously indicated, staff expects Edison to complete its interconnection study on April 17, 1998, and for the applicant to submit the study to the Commission on April 22, 1998. The California Independent System Operator (Cal-ISO) will review the interconnection study and provide its findings, conclusions on whether the project will adversely affect system reliability on May 15, 1998. We also expect the Cal-ISO to include any conclusions it has reached on measures necessary to address reliability issues identified in the study.

Ideally, staff believes that its PSA should contain: 1) a discussion of applicable laws, ordinances and standards governing the connection of the proposed project to the transmission system; 2) a description of the transmission system to which the project will be interconnected; 3) a summary and critique of the transmission interconnection study scope, assumptions and modeling techniques; 4) a summary and critique of the results of the interconnection study; 5) identification of issues that need to be addressed. However, staff notes that there are only 23 days between April 22, 1998, when staff receives the interconnection study from the applicant, and May 15, 1998, when staff publishes its PSA. Therefore, staff is concerned whether it will be able to provide more than parts 1) and 2) identified above, and a brief overview of the interconnection study results and preliminary identification of issues in its PSA.

Staff's FSA, to be filed on July 15, 1998, would include a summary of the Cal-ISO's findings, conclusions, identification of unresolved issues (if any), and any conditions of certification necessary to implement the Cal-ISO's recommendations and staff's assessment of the outlet facilities. Staff believes there is sufficient time between Cal-ISO's recommendations and the filing of staff's FSA to accomplish these tasks.

## STUDY SCOPE

The Committee's March 18, 1998 order directed staff to provide additional information on the scope of the transmission interconnection study and whether this scope is sufficient to address the three configurations under consideration. Staff provides the Committee with the following observations and comments regarding the transmission interconnection study scope:

- The Staff notes that Edison and the applicant have incorporated many of staff's January 23, 1997 comments and suggestions for the study scope. Staff believes that the study scope is generally adequate and should result in a complete study of transmission system reliability issues (see below).
- Section "1. Study scope, Part a." identifies the study will assume a nominal 700 MW project size. However, under section "3. Sensitivity Studies, Part f." it is stated that Edison will consider the affect of the three most likely power plant configurations (678 to 832). Staff also notes that Part 3 of the "System Impact Study Agreement" between Edison and the applicant (filed as part the applicant's response to staff data request number 108), indicates that Edison will study the impact of three power plant configurations. Staff assumes based on this information that three separate interconnection studies will not be performed for the High Desert Power Project, although Edison will conduct sensitivity studies to determine whether the range of project configuration sizes will alter the results of the analysis of the nominal 700 MW project size. Staff believes that this approach is acceptable, provided the sensitivities do not reveal substantial differences in the effects on system reliability due to project size, which may require different mitigation. Once staff receives the interconnection study, staff will be able to analyze whether this approach is appropriate for this case, and will advise the Committee.
- Section "1. Study scope, Part c." states that the study will include a brief analysis of any congestion caused by the new project. Staff understands the purpose of this analysis element is to determine if existing congestion in the area would be increased by the High Desert Power Project. Based on discussions with Cal-ISO staff, development and evaluation of new or modified transmission facilities to eliminate congestion are not being assessed because the Cal-ISO will use operating procedures to eliminate congestion based on its Congestion Management Protocols. For this reason, it is stated under Section "1. Study scope, Part b. " that "These system improvements will exclude requirements that could be mitigated by congestion management which falls under Cal-ISO responsibilities" This approach appears to be reasonable at this time, because staff believes it highly unlikely that new or modified transmission facilities downstream (beyond Edison's Victor Substation) will be required for this project.

However, if such facilities are required, these facilities will not have been analyzed as part of staff's environmental review of the project.

- Section "2. Loads and Resources, Part a." states that assumed loads, resources and imports will be based on the year 2001. Staff believes this is an acceptable approach. The Energy Commissions data adequacy regulations (Cal. Code Regs., tit. 20, § 1704, Appendix B (b) (2) (C)) require that the first and fifth year of planned operation of generating units be evaluated from a reliability perspective. However, as a practical matter where uncertainties regarding loads, resources and imports for the fifth year of operation would result in highly speculative conclusions with significant study costs, staff has not requested applicants to provide the fifth year study results. The staff does not believe that the speculative merits to be gained by analyzing the system for the fifth or other year of operation of the High Desert Power Project would provide information that the Energy Commission could rely on in this case.
- Section "3. Sensitivity Studies, Part g." states that loss analysis is not relevant to the interconnection requirements since the Cal-ISO will be developing the Generator Meter Multiplier at the delivery point of the project in accordance with its own protocols to account for losses. In its January 23, 1998 comments staff suggested that Edison consider analyzing system loss analysis sensitivities at an initial **macro** level unless transmission alternative analysis was needed. Based on staff's discussions, alternative transmission configurations are not under consideration by Edison and the Cal-ISO. The identification of system losses is laborious, sophisticated and a function of system additions and annual dispatch modes. Staff believes that the analytic methods developed to identify increases or decreases in losses for the Generator Meter Multiplier is acceptable although staff has no opinion on how costs should be allocated. (Draft Scheduling Protocol, SP4.2.2, March 23, 1998)
- Section "4. Schedule and Milestone Review, Part a." states that a study schedule will be prepared and will include appropriate milestone dates for review of various outputs of the interconnection study. However, staff notes that the applicant's response to staff data request numbers 108 and 110 indicate that Edison "is not planning on release [sic] the interconnection study in parts ...". Although submittal of various outputs of the interconnection study prior to April 22, would increase the probability that staff could provide a more substantive analysis in its PSA, this approach would not guarantee that the Committee would have complete disclosure of issues in the PSA, since comments from the Cal-ISO would not be available until May 15, 1998.

## **VISUAL RESOURCES**

On February 27, 1998, staff issued additional data requests numbers 111 through 116 regarding the significant visual impact from the transmission lines paralleling El Evado Road; responses are due March 30, 1998.

## **WATER RESOURCES**

On March 16, 1998 the applicant submitted information on the wells proposed to provide a water supply for the project (see Attachment B, data requests # 43 through 45, 68, and 89 through 94). The March 16, 1998 submittal, as promised by the Applicant, did not contain a detailed "water plan" describing when or how water will be acquired from the Victor Valley Water Agency and the City of Adelanto, ownership of the proposed wells, how the wells will be operated and mitigation measures to offset impacts from groundwater pumping. This information is critical to understanding and evaluating the water resources environmental consequences of the project. The applicant has indicated that this information will be provided March 27, 1998.

The applicant has indicated in response to California Unions for Reliable Energy (CURE) data request number 74 and staff data request number 98 that due to a miscalculation the water demand for the three different project configurations are different than what was identified in the AFC. The response to CURE data request number 74 states that the current estimated annual consumption of water is 250 acre feet per year for the 832 MW simple cycle configuration, 4000 acre feet per year for the 720 MW combined cycle configuration, and 3400 acre feet per year for the 678 MW combined cycle configuration. This represents over a 400 percent increase for the simple cycle configuration and represents an approximately 25 percent reduction in water demand for the combined cycle configurations. On March 25, 1998 staff learned from the applicant that it intends to file additional information that clarifies the cause of this error, provides revised water demand calculations, and updates various sections and appendices of the AFC to reflect this change in water demand. The applicant has indicated that this additional information will be filed in early April 1998.

In addition, data describing the environmental consequences from construction and operation of two of the wells (and connecting pipeline) proposed to provide water for the project has not been provided. The applicant has indicated that this information will be provide by April 17, 1998.

### **Staff Position and Recommendation**

Staff is concerned that the delay in obtaining critical information describing the applicant's proposal for providing water for the project my result in staff being unable to provide a complete analysis of water resources issues in its Preliminary Staff Assessment. Staff is particularly concerned that the water plan, to be provided on

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March 27, 1998, and additional information to be filed in early April may not contain all of the information necessary to complete staff's analysis, and this may require additional data requests or workshops to clarify the proposal. Staff also notes that the delay in providing the environmental information for two out of seven wells to supply the project will not only affect the completeness of the water resources analysis, but it may affect staff's biological, cultural and paleontological resources analyses.

## **POLICY ISSUES**

Nothing new to report.

## **OUTLINE FOR THE PRELIMINARY STAFF ASSESSMENT (PSA)**

Attachment A contains the overall outline for the PSA. This outline describes the contents, by subject area, of the PSA. It is staff's intent to include a discussion of the report contents and organization in the **Introduction** section of the PSA. The **Project Description** section of the PSA will describe the project, including the proposed three configurations.

Attachment B contains a detailed outline for a typical technical area PSA section. The laws applicable to the project and the environmental setting will be the same for all three configurations. Therefore, staff proposes only to draft one version of the **Laws, Ordinances, Regulations and Standards**, and **Environmental Setting** sections for each technical area.

Staff expects that for most technical areas the environmental consequences of any of the three configurations will be the same. For example, the proposed configurations will all use the same 25-acre site, transmission line, natural gas pipeline and water pipelines. The environmental consequences to biological, cultural, and paleontological resources from developing the site and linear facilities will be the same for all configurations. Staff believes that the only technical areas where difference in the environmental consequences will occur between the three configurations are: air quality, visual resources, water resources, and possibly public health. Therefore, most technical areas will only contain "generic" **Impact, Mitigation and Conditions of Certification** sections. The air quality, visual resources, water resources, and possibly public health technical areas will contain subsections describing the environmental impacts, mitigation, and conditions of certification for each of the three configurations (see Attachment B).

## **PROJECT SCHEDULE**

Attachment C contains staff's revised schedule for the project through July 15, 1998. This schedule reflects the events and dates presented in the Committee's March 6, 1998 Revised Scheduling Order and other new information that has become available

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since the order was issued. Four events have occurred which cause the staff concern regarding the scope and depth of analysis that staff will be able to include in its PSA. Those events are: 1) the delay in receiving critical information on the proposed water plan for the project; 2) delay in receiving environmental information on two of the five wells (and connection pipeline) to provide water for the project; 3) the depth of information supporting the applicant's emission offset package submittal; and 4) the decision not to provide interim outputs of Edison's transmission interconnection study. Attachment D shows the status of staff's data requests.

We still plan to file our PSA on May 15, 1998, although the analyses for air quality, biological resources, cultural resources, paleontological resources, public health, transmission system engineering and water resources may not be complete. Although the lack of complete analyses is undesirable, staff believes at this time that there is value to providing the PSA as scheduled; the PSA will contain important information describing the project, will identify the environmental consequences from construction and operation of the project for many technical areas, and will identify staff's proposed conditions of certification for many technical areas. Staff intends to publish its Final Staff Assessments (FSA) on July 15, 1998. The District's Final Determination of Compliance (FDOC) is expected to be filed on June 19, 1998. The time between the filing of the PSA and FSA will be used to complete staff's analysis for any incomplete technical areas, to incorporate the FDOC findings and conditions of certification, the Cal-ISO findings and conditions of certification, and to reach agreement, where possible, with the parties on staff's findings and proposed conditions of certification described in the PSA.

RKB:rkb

#### Attachments

cc:	Proof of Service	Ray Menebroker, ARB
	Chuck Fryxell, APCO Mojave Desert	Robert G. Zeller, Mojave Desert AQMD
	Matt Haber, U.S. EPA	Dan Gallagher, VVWRD
	Charlie Kraus, VVWD	Norman Caouette, MWA
	Mark Zeiring, CPUC	Manuel Alvarez, Edison
	Rebecca Jones, CDFG	

**ATTACHMENT A  
PRELIMINARY STAFF ASSESSMENT OUTLINE**

Executive Summary

Introduction **{Will include explanation of PSA organization}**

Project Description **{Will include description of the three configurations}**

Need Conformance

*Public Health & Safety Topics*

Air Quality **{Will include separate analyses of the 3 configurations}**

Public Health **{May include separate analyses of the 3 configurations}**

Safety and Fire Protection<sup>1</sup>

Hazardous Materials

Waste

*Land Use Topics*

Land Use

Traffic

Noise

Visual Resources **{Will include separate analyses of the 3 configurations}**

Cultural Resources

Socioeconomics

*Environmental Topics*

Biology

Water and Soils **{Will include separate analyses of the 3 configurations}**

Paleontological Resources

*Engineering Topics*

Facility Design<sup>2</sup>

Reliability

Efficiency

Transmission System Engineering

Alternatives

Facility Closure

Compliance (General Provisions)

Glossary of Terms and Acronyms

Report Preparation Team

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<sup>1</sup> Includes public and worker safety, fire safety, and transmission line safety and nuisance.

<sup>2</sup> Includes civil, electrical, mechanical, structural engineering and geological hazards.

**ATTACHMENT B  
Example PSA Section**

**TECHNICAL AREA  
Bert Fegg**

**INTRODUCTION**

**LAWS, ORDINANCES, REGULATIONS AND STANDARDS (LORS)**

**FEDERAL**

**STATE**

**LOCAL**

**SETTING**

**REGIONAL DESCRIPTION**

**SITE AND VICINITY DESCRIPTION**

**IMPACTS**

**POWER PLANT**

*Most technical areas will only prepare a discussion of impacts which is generic to all three configurations. Some technical areas will need to prepare separate sections for each configuration because there are potential significant differences in the level of impacts from the three configurations. Staff believes those technical areas include air quality, public health, visual resources and water resources. Those technical areas will include the following sections (shown here in italics) in their PSA sections.*

**832 MW Simple Cycle**

**720 MW Combined Cycle**

**678 MW Combined Cycle**

**TRANSMISSION LINE**

**NATURAL GAS PIPELINE**

**WATER PIPELINES**

**CUMULATIVE IMPACTS**

## **MITIGATION**

### **POWER PLANT**

*Most technical areas will only prepare a discussion regarding mitigation measures which are generic to all three configurations. Some technical areas will need to prepare separate sections for each configuration because there are potentially significant differences in the level of impacts, and thus mitigation, from the three configurations. Staff believes those technical areas include air quality, public health, visual resources and water resources. Those technical areas will include the following sections (shown here in Italics) in their PSA sections.*

#### **832 MW Simple Cycle**

#### **720 MW Combined Cycle**

#### **678 MW Combined Cycle**

### **TRANSMISSION LINE**

### **NATURAL GAS PIPELINE**

### **WATER PIPELINES**

## **CONCLUSIONS AND RECOMMENDATIONS**

### **CONCLUSIONS**

### **RECOMMENDATIONS**

### **CONDITIONS OF CERTIFICATION**

*Most technical areas will only propose conditions of certification which are generic to all three configurations. Some technical areas will need to prepare separate sections for each configuration because there are significant differences in the level of impacts, and thus in required conditions, from the three configurations. Staff believes those technical areas include air quality, public health, visual resources and water resources. Those technical areas will include the following sections (shown here in italics) in their PSA sections.*

#### **832 MW SIMPLE CYCLE**

#### **720 MW COMBINED CYCLE**

#### **678 MW COMBINED CYCLE**

### **REFERENCES**

**ATTACHMENT C**  
**Schedule For**  
**High Desert Power Project (97-AFC-1)**

<b>DATE</b>	<b>DAYS</b>	<b>EVENT</b>
03-Dec-97	0	Application accepted for data adequacy, process begins
05-Mar-98	92	Committee Issues Revised Scheduling Order
11-Mar-98	98	Applicant submitted responses to CURE's Data Requests
16-Mar-98	103	Applicant submitted water resources information and some environmental information on wells and pipeline but did not include water plan or environmental information on two wells
16-Mar-98	103	Applicant submits responses to questions from CDFG
19-Mar-98	106	Committee Issues Order: re: Specific Requests
20-Mar-98	107	Applicant submits Offset Proposal to Mojave Desert AQMD
25-Mar-98	112	Applicant submits water plan (date tentative)
25-Mar-98	112	Staff submits data requests regarding 25% reduction in project's water demand
25-Mar-98	112	Parties submit second status report to Committee
30-Mar-98	117	Second round visual and alternative data responses due from applicant
03-Apr-98	121	Revised Hazardous Materials data response #34 due from applicant
17-Apr-98	135	Applicant submits additional environmental information on well and well pipeline
20-Apr-98	138	APCD files Preliminary Determination of Compliance
22-Apr-98	140	Edison completes transmission interconnection study, and applicant submits study including stability analysis
24-Apr-98	142	Parties submit status report (3) to Committee; request conference if necessary
15-May-98	163	Cal-ISO completes review of Edison's transmission interconnection study
15-May-98	163	File Preliminary Staff Assessment
19-Jun-98	198	Mojave Desert District Files Final Determination of Compliance
15-Jul-98	224	File Final Staff Assessment

**ATTACHMENT B**  
**STATUS REPORT ON CALIFORNIA ENERGY COMMISSION STAFF'S DATA REQUESTS**  
**HIGH DESERT POWER PROJECT 97-AFC-1**

Data Request No. *	Technical Area	Author	Subject	Due Date	Applicant's Alternative Due Date	Response Received	Comments
NA	Air Quality	District	BACT, Visibility and Health Risk Analysis	20-Jan-98		23-Feb-98	Applicant submitted information requested by District.
NA	Air Quality	District	Emission Offset Package	20-Mar-98	19-Mar-98	19-Mar-98	Applicant submitted information to District.
13	Air Quality	TNgo	Offsets	16-Jan-98	19-Mar-98		Status responses received 1/16.
14	Air Quality	TNgo	Offsets	16-Jan-98	19-Mar-98		Status responses received 1/16.
15	Air Quality	TNgo	Offsets	16-Jan-98	19-Mar-98		Status responses received 1/16.
16	Air Quality	TNgo	Offsets	16-Jan-98	19-Mar-98		Status responses received 1/16.
17	Air Quality	TNgo	Offsets	16-Jan-98	19-Mar-98		Status responses received 1/16.
18	Air Quality	TNgo	Offsets	16-Jan-98	19-Mar-98		Status responses received 1/16.
34	Haz. Mat. Handling	RTyler	Model worst case spill	Jan 16, 1998	Apr 3, 1998		Response received 1/16 was incomplete. At the 2/25 workshop applicant agreed to revise the modeling analysis.
43	Project Descrip.	RBuell	Water wells information	16-Jan-98	15-Mar-98	16-Mar-98	Information submitted did not include water plan or environmental data for two wells.
44	Project Descrip.	RBuell	Pipeline for Wells	16-Jan-98	15-Mar-98	16-Mar-98	See note on data request #43.
45	Project Descrip.	RBuell	Enviro inform. for wells/pipeline	16-Jan-98	15-Mar-98	16-Mar-98	See note on data request #43.
68	Water Resources	JOHagan	Well analysis	16-Jan-98	15-Mar-98	16-Mar-98	See note on data request #43.
77	Transmission System Eng.	AMcCuen	Stability analysis	16-Jan-98	22-Apr-98		
111	Visual Resources	GDWalker	Photo reproductions from KOP 17	30-Mar-98			Follow-up data request to responses 53 - 56.
112	Visual Resources	GDWalker	Photo simulations from KOP 17	30-Mar-98			Follow-up data request to responses 53 - 56.
113	Visual Resources	GDWalker	Evaluate impacts on views.	30-Mar-98			Follow-up data request to responses 53 - 56.
114	Visual Resources	GDWalker	Discuss mitigation	30-Mar-98			Follow-up data request to responses 53 - 56.
115	Visual Resources	GDWalker	Before photos	30-Mar-98			Follow-up data request to responses 53 - 56.
116	Visual Resources	GDWalker	After simulations	30-Mar-98			Follow-up data request to responses 53 - 56.
117	Alternatives	EAllen	Cooling Water Objective	30-Mar-98			
118	Alternatives	EAllen	South Coast AQMD	30-Mar-98			
119	Alternatives	EAllen	Smaller size projects	30-Mar-98			
120	Water Resources	JOHagan	Reason for revising water demand	25-Apr-98			
121	Water Resources	JOHagan	Revised water supply analysis	25-Apr-98			
122	Water Resources	JOHagan	Revise project description	25-Apr-98			

\* Staff has received responses to data requests not shown here.