November 29, 2012

Siting Committee
Raoul Renaud, Hearing Officer
Eric Solorio, Project Manager
California Energy Commission
Docket No. 11-AFC-3
1516 9th Street
Sacramento, CA 95814

Re: Cogentrix Quail Brush Generation Project - Docket Number 11-AFC-03,
Response to Intervenors Center for Biological Diversity and Preserve Wild
Santee and Center for Biological Diversity Data Requests 1-17 (Set One)

Docket Clerk:

Pursuant to the provisions of Title 20, California Code of Regulations, and on behalf of
Cogentrix Quail Brush Genco, LLC, a wholly owned subsidiary of Cogentrix Energy, LLC,
Bingham McCutchen LLP hereby submits the Response to Intervenors Center for
Biological Diversity and Preserve Wild Santee and Center for Biological Diversity Data
Requests 1-17 (Set One). The remaining data requests were addressed in the Applicant’s
20-day initial response to these data requests docketed on November 19, 2012. The Quail
Brush Generation Project is a 100 megawatt natural gas fired electric generation peaking
facility to be located in the City of San Diego, California.

If you have any questions regarding this submittal, please contact Rick Neff at (704)
525-3800 or me at (415) 393-2572.

Sincerely yours,

Ella Foley Gannon

cc: Lori Ziebart, Cogentrix
    John Collins, Cogentrix
    Rick Neff, Cogentrix
    Proof of Service List
APPLICATION FOR CERTIFICATION FOR THE
QUAIL BRUSH GENERATION PROJECT

DOCKET NO. 11-AFC-03
PROOF OF SERVICE
(Revised 11/19/2012)

APPLICANT
Cogentrix Energy, LLC
C. Richard “Rick” Neff, Vice President
Environmental, Health & Safety
9405 Arrowpoint Boulevard
Charlotte, NC  28273
rickneff@cogentrix.com

Cogentrix Energy, LLC
John Collins, VP Development
C. Richard “Rick” Neff, Vice President
Environmental, Health & Safety
9405 Arrowpoint Boulevard
Charlotte, NC  28273
johncollins@cogentrix.com
loriziebart@cogentrix.com

Cogentrix Energy, LLC
John Collins, VP Development
Lori Ziebart, Project Manager
Quail Brush Generation Project
9405 Arrowpoint Blvd.
Charlotte, NC  28273
johncollins@cogentrix.com
loriziebart@cogentrix.com

APPLICANT’S CONSULTANTS
Tetra Tech EC, Inc.
Sr. Environmental Project Manager
143 Union Boulevard, Suite 1010
Lakewood, CO  80228
connie.farmer@tetratech.com

Tetra Tech EC, Inc.
Barry McDonald
VP Solar Energy Development
17885 Von Karmen Avenue, Ste. 500
Irvine, CA  92614-6213
barry.mcdonald@tetratech.com

Tetra Tech EC, Inc.
Sarah McCall
Sr. Environmental Planner
143 Union Boulevard, Suite 1010
Lakewood, CO  80228
sarah.mccall@tetratech.com

COUNSEL FOR APPLICANT
Bingham McCutchen LLP
Ella Foley Gannon
Camarin Madigan
Three Embarcadero Center
San Francisco, CA  94111-4067
ella.gannon@bingham.com
camarin.madigan@bingham.com

Tetra Tech EC, Inc.
Barry McDonald
VP Solar Energy Development
17885 Von Karmen Avenue, Ste. 500
Irvine, CA  92614-6213
barry.mcdonald@tetratech.com

INTervenORS
Roslind Varghese
9360 Leticia Drive
Santee, CA  92071
roslindv@gmail.com

Rudy Reyes
8655 Graves Avenue, #117
Santee, CA  92071
reyes2777@hotmail.com

Dorian S. Houser
7951 Shantung Drive
Santee, CA  92071
dhouser@cox.net

Kevin Brewster
8502 Mesa Heights Road
Santee, CA  92071
lzpup@yahoo.com

Phillip M. Connor
Sunset Greens Home Owners Association
8752 Wahl Street
Santee, CA  92071
connorphil48@yahoo.com

Mr. Rob Simpson, CEO
Helping Hand Tools
1901 First Avenue, Suite 219
San Diego, CA  92101
rob@redwoodrob.com

*Sierra Club, San Diego Chapter
Robert W. Wright
c/o Law Office of Robert W. Wright
716 Castro Street
Solana Beach, CA  92075
bob.wright@mac.com

HomeFed Fanita Rancho, LLC
Jeffrey A. Chine
Heather S. Riley
Allen Matkins Leck Gamble
Mallory & Natsis LLP
501 West Broadway, 15th Floor
San Diego, CA  92101
jchine@allenmatkins.com
hliley@allenmatkins.com
jkaup@allenmatkins.com
vhoy@allenmatkins.com

Preserve Wild Santee
Van Collinsworth
9222 Lake Canyon Road
Santee, CA  92071
savefanita@cox.net

Center for Biological Diversity
John Buse
Aruna Prabhala
351 California Street, Suite 600
San Francisco, CA  94104
jbuse@biologicaldiversity.org
aprabhala@biologicaldiversity.org

INTERESTED AGENCIES
California ISO
e-recipient@caiso.com

City of Santee
Department of Development Services
Melanie Kush
Director of Planning
10601 Magnolia Avenue, Bldg. 4
Santee, CA  92071
mkush@ci.santee.ca.us

*indicates change
INTERESTED AGENCIES (cont.)
Morris E. Dye
Development Services Dept.
City of San Diego
1222 First Avenue, MS 501
San Diego, CA  92101
mdye@sandiego.gov

Mindy Fogg
Land Use Environmental Planner
Advance Planning
County of San Diego
Department of Planning & Land Use
5510 Overland Avenue, Suite 310
San Diego, CA  92123
mindy.fogg@sdcounty.ca.gov

ENERGY COMMISSION –
DECISIONMAKERS
KAREN DOUGLAS
Commissioner and
Presiding Member
karen.douglas@energy.ca.gov

ANDREW McALLISTER
Commissioner and
Associate Member
andrew.mcallister@energy.ca.gov

Raoul Renaud
Hearing Adviser
raoul.renaud@energy.ca.gov

Eileen Allen
Commissioners' Technical
Adviser for Facility Siting
eileen.allen@energy.ca.gov

Galen Lemei
Advisor to Commissioner Douglas
galen.lemei@energy.ca.gov

Jennifer Nelson
Advisor to Commissioner Douglas
jennifer.nelson@energy.ca.gov

David Hungerford
Advisor to Commissioner McAllister
david.hungerford@energy.ca.gov

Patrick Saxton
Advisor to Commissioner McAllister
patrick.saxton@energy.ca.gov

ENERGY COMMISSION STAFF
Eric Solorio
Project Manager
eric.solorio@energy.ca.gov

Stephen Adams
Staff Counsel
stephen.adams@energy.ca.gov

ENERGY COMMISSION –
PUBLIC ADVISER
Jennifer Jennings
Public Adviser’s Office
publicadviser@energy.ca.gov
DECLARATION OF SERVICE

I, Margaret Pavao, declare that on November 29, 2012, I served and filed copies of the attached Response to Intervenors Center for Biological Diversity and Preserve Wild Santee and Center for Biological Diversity Data Requests 1-17 (Set One), dated November 29, 2012. This document is accompanied by the most recent Proof of Service list, located on the web page for this project at: http://www.energy.ca.gov/sitingcases/quailbrush/index.html.

The document has been sent to the other parties in this proceeding (as shown on the Proof of Service list) and to the Commission’s Docket Unit or Chief Counsel, as appropriate, in the following manner:

(Check all that Apply)

For service to all other parties:

X Served electronically to all e-mail addresses on the Proof of Service list;

X Served by delivering on this date, either personally, or for mailing with the U.S. Postal Service with first-class postage thereon fully prepaid, to the name and address of the person served, for mailing that same day in the ordinary course of business; that the envelope was sealed and placed for collection and mailing on that date to those addresses marked “hard copy required” or where no e-mail address is provided.

AND

For filing with the Docket Unit at the Energy Commission:

X by sending an electronic copy to the e-mail address below (preferred method); OR

by depositing an original and 12 paper copies in the mail with the U.S. Postal Service with first class postage thereon fully prepaid, as follows:

CALIFORNIA ENERGY COMMISSION – DOCKET UNIT
Attn: Docket No. 11-AFC-03
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512
docket@energy.ca.gov

OR, if filing a Petition for Reconsideration of Decision or Order pursuant to Title 20, § 1720:

by delivering on this date one electronic copy by e-mail, and an original paper copy to the Chief Counsel at the following address, either personally, or for mailing with the U.S. Postal Service with first class postage thereon fully prepaid:

California Energy Commission
Michael J. Levy, Chief Counsel
1516 Ninth Street MS-14
Sacramento, CA 95814
michael.levy@energy.ca.gov

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, that I am employed in the county where this mailing occurred, and that I am over the age of 18 years and not a party to the proceeding.

Margaret Pavao
November 29, 2012

Siting Committee
Raoul Renaud, Hearing Officer
Eric Solorio, Project Manager
California Energy Commission
1516 Ninth Street, MS-15
Sacramento, CA 95814

Re: Quail Brush Generation Project (11-AFC-03),
Response to Intervenors Center for Biological Diversity and Preserve Wild
Santee and Center for Biological Diversity Data Requests 1-17 (Set One)

Dear Members of the Siting Committee and Mr. Solorio:

In response to Center for Biological Diversity and Preserve Wild Santee (Intervenors) Data Requests, 1 through 17, Quail Brush Generation Project (Quail Brush) provided an initial response to Requests 7, 8, 9, 10, 11, 12, and 17 on November 19, 2012. Quail Brush provides responses to Requests 1-6, and 13-16 below.

1. Data Request: In a wind-driven wildfire, please describe the specific tasks and the amount of time required per task for "shutdown and de-energizing of the power plant ... to protect human health, the electrical grid and the environment."

Response:

The required time to shut-down a Wartsila 20V34SG engine from full load is 1 minute. If required, a single shut-down command can be issued for all engines simultaneously. This ability allows the removal of all generation in one minute even if the facility is operating at 100% capacity. Once the engine shut-down has occurred, the incoming electrical breaker can be immediately opened to disconnect the facility from the grid thus de-energizing all power within the plant. At that same time, the natural gas flow to the facility will be stopped via a control valve located at the gas regulating and metering station. The post engine shut-down events of de-energizing and cutting-off the natural gas flow will take an additional minute.
The Quail Brush facility will operate under a Wildfire Response Emergency Action Plan (EAP). A draft of this plan was docketed on July 9, 2012. The purpose of the EAP is to facilitate and organize employer and employee actions during a wildfire emergency. Plant response and notification procedures will be conducted as described in the EAP.

2. **Data Request:** What “shutdown and de-energizing” procedures would take place in sequence and what procedures are simultaneous?

**Response:**
Refer to the response to Data Request 1 above.

3. **Data Request:** What procedures are automated and what procedures would be manual?

**Response:**
Specific shutdown and de-energizing procedures will be determined during the detail design of the facility in compliance with applicable Laws, Ordinances, Regulations, and Standards (LORS). Refer to the response to Data Request 1 above.

4. **Data Request:** What are the potential causes of “shutdown and de-energizing” procedural failure and what back-up measures would be made available?

**Response:**
The Applicant cannot conceive of a “procedural failure”, nor is aware of any historical event, which would preclude the ability of the facility to be shutdown and de-energized. The facility has the ability to disconnect unilaterally from the natural gas supply and transmission system. San Diego Gas and Electric (SDG&E) also has the ability to unilaterally disconnect the natural gas supply and transmission system from the facility.

5. **Data Request:** Please specifically estimate the time to accomplish procedural measures and the additional time if back-up measures are required.

**Response:**
Refer to the response to Data Request 4 above.

6. **Data Request:** For any task described in Requests 1-17 that may not be completed in time or before a fire front passes over the power plant site, please specify the next backup measure, if any, and the range of potential consequences for not completing any specific measure needed to secure the power plant during a wind-driven wildfire.

**Response:**
Refer to the response to Data Request 4 above.
13. **Data Request:** Please describe the brush management zones including lengths, locations and maintenance requirements. Would brush management zones extend off of the Project site parcel? What are the biological impacts and what is the mitigation for biological impacts of brush management zones?

**Response:**

Brush management zones are shown and described on the Brush Management Plan docketed on October 31, 2012. Brush Management zones do not extend off the Project site parcel. Brush management zones are within the established Project disturbance footprint with no additional biological impact. Mitigation of brush management zones is included in the Biological Resources Survey Report, docketed on October 15, 2012.

14. **Data Request:** What are the evacuation routes and safety zones for Project personnel and visitors on and off-site?

**Response:**

The evacuation route will be via Sycamore Landfill Road toward Mast Blvd. Facility safety zones will be determined during facility detail design in conjunction with the San Diego Fire-Rescue Department (SDFD). Evacuation will be in accordance with facility emergency action plans (EAPs).

15. **Data Request:** How much time will it take to prepare transportation, load passengers, account for employees and visitors, depart and arrive at safety zones identified?

**Response:**

Once an evacuation order is given, it would take approximately five minutes for employees and visitors to reach their vehicles, exit the facility, and reach Mast Blvd. This time frame is achievable due to the relatively small size of the facility and limited number of employees and expected visitors on-site at any one time.

16. **Data Request:** Please describe the capacity, design and location of any shelter-in-place structure.

**Response:**

The Shelter-in-Place will be located in the facility’s control room. Shelter-in-Place dimensions, materials of construction, and required equipment will be determined in conjunction with SDFD as part of the comprehensive fire protection plan.
I certify under penalty of perjury that the foregoing is true, correct, and complete to the best of my knowledge.

Regards,

___________________________
C. Richard Neff
Vice President

cc: Docket (11-AFC-3)