

QUAIL BRUSH GENCO, LLC

9405 Arrowpoint Boulevard
Charlotte, NC 28273

August 25, 2011

Mr. Robert Olgesby
Executive Director
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

RE: Quail Brush Generation Project Application for Certification

Dear Mr. Olgesby:

Quail Brush Genco, LLC is pleased to submit the enclosed Application for Certification (AFC) for its proposed Quail Brush Generation Project. The project as described within the application comprises a nominal 100 MW natural gas-fired peaking power facility located within the City of San Diego. The site for the project was specifically chosen because of its close proximity to existing high voltage transmission lines and natural gas lines situated within the project site.

Quail Brush Genco has entered into a Power Purchase Tolling Agreement (PPTA) with San Diego Gas & Electric Company (SDG&E) under which the facility capacity, energy and other ancillary services are to be purchased over a twenty-year period. The PPTA calls for the proposed project to commence commercial operation in June 2014.

The project is being developed to help serve SDG&E's future peak power demand and transmission system reliability needs. The facility's high efficiency and quick start capabilities will also help SDG&E meet customer demand when intermittent renewable generating resources are not available. In an earlier press release issued by SDG&E, it was indicated that the proposed project along with other new peaking resources will "help SDG&E to reduce its greenhouse gas (GHG) emissions and to contribute toward the state's overall GHG reduction goal". SDG&E is seeking approval of the PPTA for the proposed project under a separate ongoing proceeding before the California Public Utility Commission.

On July 8, 2011, representatives of our project team including outside consultants engaged to support preparation of the AFC attended a pre-application meeting with representatives of the CEC's Siting, Transmission, and Environmental Protection Division to discuss the project features and obtain CEC staff comments on the application content requirements. CEC staff also had a pre-application meeting on July 20, 2011 with the City of San Diego Development Services Department and the project team to discuss the CEC licensing process and project features requiring City of San Diego oversight and approval. We greatly appreciate CEC staff's time and pre-application guidance.

We look forward to the commencement of the CEC license review process for our application and addressing all questions and comments raised by your staff during its review in a timely manner. Please direct any questions or comments you have directly to Gary Palo or Rick Neff, both of whose contact information is provided below.

Quail Brush Genco, LLC requests that the service list for these proceedings include the following:

C. Richard "Rick" Neff
Vice President – Environment, Health & Safety
Cogentrix Energy, LLC
9405 Arrowpoint Boulevard
Charlotte, NC 28273
RickNeff@Cogentrix.com

Ella Foley Gannon
Kevin Poloncarz
Camarin Madigan
Bingham McCutchen LLP
Three Embarcadero Center
San Francisco, CA
94111-4067
ella.gannon@bingham.com
kevin.poloncarz@bingham.com
camarin.madigan@bingham.com

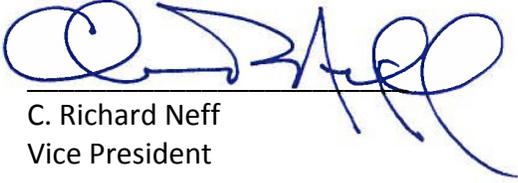
(e-mail service preferred)

Gary Palo
Vice President Development
Cogentrix Energy, LLC
6 Belcourt Drive
Newport Beach, CA 92660
GaryPalo@Cogentrix.com

Connie Farmer
Senior Environmental Project Manager
Tetra Tech EC, Inc.
143 Union Blvd., Suite 1010
Lakewood, CO 80228
connie.farmer@tetrattech.com

As an officer of Quail Brush Genco, LLC, I hereby attest, under penalty of perjury, that the contents of this Application for Certification for the Quail Brush Generation Project are true and correct.

Regards,

A handwritten signature in blue ink, appearing to read 'C. Richard Neff', written over a horizontal line. The signature is stylized and cursive.

C. Richard Neff
Vice President

cc: Gary L. Palo

Ella Foley Gannon, Esq.