



June 26, 2006

Mr. Steve Munro  
Compliance Project Manager  
California Energy Commission, MS-2000  
1516 Ninth Street  
Sacramento, CA 95814

**Subject: Comments on Staff Analysis to Amend Condition of Certification S&W-4  
High Desert Power Project, LLC  
CEC Docket No. 97-AFC-1C**

Mr. Munro:

Enclosed for your review and consideration are minor editorial and clarification comments on the Staff Analysis of the High Desert Power Project's (HDPP) petition to amend Condition of Certification Soil and Water-4.

Should you have any questions or need additional information regarding our comments, please contact me at 949-425-4755

Thank you for the opportunity to review and comment on the Staff Analysis Report.

Sincerely,

Ramiro R. Garcia  
Environmental Director – West Region  
Constellation Energy

cc: Dave Boward, High Desert Power Project  
Reggie Lamson, Victor Valley Water District  
Jon Boyer, Constellation Energy  
Steve Shulder, Constellation Energy  
Chris Millner, High Desert Power Project  
Project File: 13.2

## HDPP Comments on CEC Staff Analysis to Amend the HDPP Condition of Certification S&W-4

Section	Comment
Page 3 Paragraph 1	Note that the Conditional Waiver will expire in February 2007. HDPP has submitted an application for a waste discharge requirements (WDR) permit in late March. The Lahontan Regional Water Quality Control Board requested additional clarification which will be provided by the end of June 2006.
Page 3 Paragraph 2	HDPP purchases SWP water from MWA through the City of Victorville
Page 3 Paragraph 4	Note that the 13,000 acre-feet is a net injection that includes dissipation and the replacement of water used until the banking requirement is achieved.
Page 4 Paragraph 1	Note that the benefit to the aquifer and Mojave River is the 1,000 acre-feet that will remain and not be available for plant use.
Page 5 Paragraph 2	Planned maintenance on the aqueduct The MWA water supply was interrupted in May 2006 and the plant used approximately 19 acre-feet to support operation (5/4 to 5/8).
Page 6 Paragraph 1	Note that the original estimation of annual injection was high. Maximum potential injection with the ABS operating at 100 percent of capacity and injecting 2,150 gpm the annual total would only be approximately 3,230 acre-feet, assuming 20 days of outage for maintenance per year.
Page 6 Paragraph 2	HDPP notes that there are environmental benefits of extending the schedule. As mentioned in this paragraph, lengthening the injection schedule would increase the amount of dissipation, therefore increasing the benefit to the Mojave River.
Page 6 Paragraph 4	Please note that the first condition of injecting a net of 1,000 acre-feet of water by the end of the first year of commercial operation was achieved.
Page 7 Paragraph 3	For clarity, please note that HDPP has not exceeded the annual average or maximum concentration for TDS, although injection has been discontinued in order to meet the annual average limit. The maximum concentration of THMs has also not been exceeded. HDPP has shutdown banking in 2004 and 2005 when the calculations indicated the annual average for THMs could not be achieved even with non-detectable results in subsequent months.
Page 8 Paragraph 1	Please note that the THM annual average treatment level was set at the detection limit (0.5 ug/l) for the analytical method.
Page 8 Paragraph 2	The UF system typically is designed to remove extremely small particulate matter and not a substantial amount of organic matter that are precursors for THM formation. Improving the effectiveness of the UF will not result in lower THM formation. The chloramination system is used to maintain cleanliness of the booster pump station, pipeline, and well injection systems. Pathogens, etc. would be removed by the ABS treatment system. Reducing the chloramines feed has not been effective in controlling low level formation of THM. Test results have ranged from less than 0.5 to a high of 3.1 ug/L.
Page 9 Paragraph 2	The annual average of 248 mg/L was set using the average incoming water TDS from 1994 to 2000 (233 mg/L) plus the estimated addition from treatment chemicals of 15 mg/L.
Page 14 Paragraph 6	Replace TDS with THM. UV performance will reduce THM formation.