

CALIFORNIA ENERGY COMMISSION1516 NINTH STREET
SACRAMENTO, CA 95814-5512

October 6, 2006

Donal O'Callaghan
Director of Light and Power
City of Vernon
4305 Santa Fe Avenue
Vernon, CA 90058**DOCKET**
06-AFC-4DATE OCT -6 2006RECD. OCT -6 2006

Dear Mr. O'Callaghan,

VERNON POWER PLANT PROJECT (06-AFC-4) DATA REQUESTS

Pursuant to Title 20, California Code of Regulations, section 1716, the California Energy Commission staff requests the information specified in the enclosed data requests. The information requested is necessary to: 1) more fully understand the project, 2) assess whether the facility will be constructed and operated in compliance with applicable regulations, 3) assess whether the project will result in significant environmental impacts, 4) assess whether the facilities will be constructed and operated in a safe, efficient and reliable manner, and 5) assess potential mitigation measures.

This set of data requests (#1-48) is being made in the areas of air quality, biological resources, cultural resources, land use, noise, soil and water resources, traffic and transportation, visual resources, and waste management. Written responses to the enclosed data requests are due to the Energy Commission staff on or before November 6, 2006, or at such later date as may be mutually agreed.

If you are unable to provide the information requested, need additional time, or object to providing the requested information, you must send a written notice to both Chairman Jackalyn Pfannenstiel, Presiding Committee Member for the Vernon Power Plant Project, and to me, within 10 days of receipt of this letter. The notification must contain the reasons for not providing the information, the need for additional time, and the grounds for any objections (see Title 20, California Code of Regulations, section 1716 (f)).

If you have any questions, please call me at (916) 653-1245, or E-mail me at jreede@energy.state.ca.us.

Sincerely,

s/ James W. Reede, Jr., Ed.D.
Energy Facility Siting Project ManagerEnclosure
cc: POS

**Vernon Power Plant Project
Data Requests
(06-AFC-4)**

Technical Area: Air Quality

Author: Joe Loyer

BACKGROUND: EMISSION REDUCTION CREDITS AND OFFSETS

The City of Vernon (Vernon) proposes three possible mitigation strategies. Staff believes that each strategy raises several timing and implementation issues. First, for Carbon Monoxide (CO) only, Vernon notes that if the District is re-designated as attainment of the federal CO standards by the U.S. Environmental Protection Agency (USEPA), the District would not require CO offsets. Currently, the USEPA expects the re-designation process to be completed in late December of 2006. However, federal re-designation can be a multi-year process and still might not occur in the time frame of this licensing proceeding. Second for CO, Volatile Organic Compounds (VOC), Sulfur Dioxide (SO₂), and Particulate Matter (PM₁₀), Vernon proposes to purchase Emissions Reduction Credits (ERCs) on the open market, where they are in short supply. Third, Vernon identified the Priority Reserve as an option for credits, whereas staff is uncertain of the preceding steps that Vernon has taken before selecting the Reserve as a mitigation strategy.

The AFC does not provide documentation that sufficient CO, VOC, SO₂ or PM₁₀ ERCs have been secured, either through option contracts or outright ownership, or that the applicant has made a good faith effort to first purchase ERCs through the existing market system as required for the Priority Reserve program. For staff to complete its analysis and to present testimony that the project is fully mitigated, evidence needs to be provided by the applicant that credits have been secured.

DATA REQUEST

1. Please identify any CO, VOC, SO₂ or PM₁₀ ERCs owned by the applicant that the District will require to be surrendered as a condition for participation in the Priority Reserve. Please include the ERC number, the pollutant type and amount in pounds per day, and ERC source location.
2. If the applicant is unable to adequately respond to Data Request 1 above, please provide a status report starting November 1, 2006 and continuing monthly until the report identifies option contracts and/or evidence of acquisition of ERCs for the CO, VOC, SO₂ and PM₁₀ liability of the project. This status report should be submitted monthly until the start of evidentiary hearings. The report should be specific to each pollutant and provide new information and update information from previous monthly status reports as appropriate. The reports should include:
 - a. contact names and telephone numbers;
 - b. company or source names;
 - c. pollutant credit types and amounts in lbs/day;
 - d. ERC certificate numbers;
 - e. the methods of emission reductions (e.g., shutdown, reduction of hours of operation, emission controls, etc.);
 - f. the status of ERC or option negotiations;

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- g. the location of the emission reduction credits.

BACKGROUND: FINE PARTICULATE MATTER (PM2.5)

The applicant has not provided any discussion about mitigation of the facility's PM2.5 impacts (generally 100 percent of natural gas combustion particulate matter is PM2.5) on the local and regional air quality. Because the District does not have an offset requirement for PM2.5, staff is concerned that the current or revised Priority Reserve program and PM10 ERC program will not be able to specifically provide PM2.5 emission reductions, thereby making it difficult to conclude that the project's PM2.5 liability is mitigated.

DATA REQUEST

3. Please provide proposal(s) to mitigate the facility's potentially significant PM2.5 impacts.
4. Please investigate and report on the potential for local particulate matter emission reductions and mitigation measures.

BACKGROUND: VOLATILE ORGANIC COMPOUNDS

The applicant has provided a significant number of the VOC Emission Reduction Credits; however, a portion of the credits have not been secured to date. Those ERCs will have to be secured prior to the District issuing its Final Determination of Compliance.

DATA REQUEST

5. Please provide the ERC certificate numbers and the appropriate documentation available from the District that indicates where these emission reductions were located. Please update staff as to the status of securing the VOC ERCs as part of the monthly status report discussed in Data Request 2.

BACKGROUND: NITROGEN OXIDES

The applicant proposes to rely on the District's nitrogen oxides (NOx) RECLAIM program to acquire emission reduction credits to mitigate the project NOx emission impacts.

DATA REQUEST

6. Please provide a list of NOx RECLAIM trading credits (RTCs) that the applicant owns or has under option contract. Please update staff as to the status of securing the NOx RTCs as part of the monthly status report discussed in Data Request 2.

BACKGROUND: NATURAL GAS SULFUR CONTENT

The AFC indicates that the facility will use natural gas with a maximum sulfur content of 0.35 grains per 100 standard cubic feet (gr/100scf). Staff has seen in previous siting cases that the delivered natural gas can contain as much as 1gr sulfur/100scf. If higher sulfur content natural gas fuel is used at the facility, SOx and PM emissions may be underestimated.

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DATA REQUEST

7. Please provide specific documentation from Southern California Gas Company that the sulfur content of supplied natural gas will not be above 0.35 gr/100scf.
8. Please provide the steps the applicant would take to ensure that natural gas that has higher than 0.35 gr/100scf of sulfur will not be used at the facility.
9. Please provide the method for ensuring continuous compliance with the sulfur content limits specified for the supplied natural gas fuel.

BACKGROUND: CUMULATIVE ASSESSMENT

The applicant indicates on page 8.1-63 in the AFC that the required cumulative assessment will be completed and submitted in August of 2006.

DATA REQUEST

10. Please provide the cumulative assessment.

BACKGROUND

Staff intends to conduct a plume modeling analysis using the Combustion Stack Visible Plume (CSVP) model and the Seasonal Annual Cooling Tower Impact (SACTI) model for the project, as is done for all projects with cooling towers. Staff will provide the applicant with a copy of the CSVP model training manual upon request.

DATA REQUEST

11. Please provide five complete consecutive years of meteorological data files in either the National Climate Data Center (NCDC) CD144 (surface data), NCDC-TD3280 (hourly surface observations with precipitation), or Hourly United States Weather Observations (HUSWO) format. The files should be the most recent years available. The files must include location, present weather, cloud cover, and visibility data. Please include a complete description of the source of this data (i.e. specific location, anemometer height, etc), and a discussion of why the data is representative of the area. Please also provide an electronic copy of the raw meteorological data file for each year in the format chosen from above.
12. Please also provide meteorological data files for the same five years in Industrial Source Complex (ISCST3) modeling format from the above data source. These files must include stability class data.
13. Please provide the values for heat rejection (MW/hr), exhaust temperature, and exhaust mass flow rate that affect cooling tower vapor plume formation for a range of ambient conditions that represent reasonable worst-case operating scenarios. At a minimum, please fill in all blanks in the table below. Please also update/correct the table, if necessary.

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Parameter	Cooling Tower Exhausts		
Number of Cells	14		
Cell Height*	17.68 meters		
Cell Diameter*	9.14 meters		
Tower Housing Length (7 cells)*	117.35 meters		
Tower Housing Width (2 cells)*	31.70 meters		
Ambient Temperature	43 °F	59 °F	104 °F
Ambient Relative Humidity	80 %	65 %	50 %
Heat Rejection (MW/hr) or (MMBtu/hr)			
Exhaust Flow (CFM)			
Exhaust Mass Flow Rate (lb/hr)			
Air Density (lbs/scf)			
Ambient Air Pressure (psia)			
Exhaust Temperature (°F)			

*Stack dimensions from AFC.

Staff intends to model the cooling tower using hourly estimated exhaust conditions based on the hourly ambient conditions of the meteorological file. Staff will assume saturated cooling tower exhaust at the exhaust temperature determined through interpolation for the hourly ambient conditions. Therefore, additional combinations of temperature and relative humidity, if provided by the applicant, will more accurately represent the cooling tower exhaust conditions.

14. Please indicate if the cooling tower has any plume mitigation features that would reduce the exhaust moisture content below the saturated level.
15. Please provide the cooling tower make and model number, and any vendor documentation available for the specific model.
16. Please provide a fogging frequency curve from the cooling tower vendor, if available.
17. Please indicate how many cooling tower cells will be turned on under different potential partial load conditions. Please also note if ambient conditions, such as cold temperatures, dictate when cells may be turned off.
18. Please confirm that the cooling tower fan motors will not have a variable speed/flow controller.

**Vernon Power Plant Project
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Technical Area: Biological Resources

Author: Misa Ward

BACKGROUND

Section 8.2-6 on page 8.2-17 indicates that four staff members from biological resources agencies listed in Table 8.2-4 have been contacted regarding the project and potential biological issues of concern. Page 8.2-11 makes reference to a U.S. Fish and Wildlife Service (USFWS) letter of concurrence, and page 8.2-17 notes that the U.S. Army Corps of Engineers (USACE) and Regional Water Quality Control Board (RWQCB) have stated that 401 and 404 permitting are not required. However, staff could not find any documentation on the dates, personnel, and content of communications with the California Department of Fish and Game (CDFG), RWQCB, USACE, or USFWS regarding the potential for biological resources, such as sensitive species or waters of the U.S., in the project vicinity.

DATA REQUEST

19. Please provide any documents (i.e., letters or records of conversation including dates and names of agency personnel) that resulted from communication with CDFG, RWQCB, USACE, and USFWS regarding potential impacts to sensitive biological resources and the jurisdictional status of the Los Angeles River.

**Vernon Power Plant Project
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Technical Area: Cultural Resources

Author: Beverly Bastian

NOTE: If a response reveals archaeological site locations, please submit it under confidential cover.

BACKGROUND

The November, 2005, Initial Geotechnical Report for the proposed Vernon Power Plant (Appendix 8.15A) determined that the natural subsoils on the site are unsuitable for power plant structure foundations. The report recommends that 2 to 10 feet of the topmost natural soils be removed and replaced with structured and compacted fill (pp. 13-16) in various locations where foundations and pavement would be installed. The AFC does not indicate whether this would be done. Nor does it identify any off-site disposal or borrow areas, if soil removal and replacement would be done. To identify all impacts of the proposed project, staff needs to know if soil removal is planned and if the chosen soil disposal and borrow sites have been surveyed for cultural resources.

DATA REQUESTS

20. If soils will be removed, please identify the locations where this would be done, and the depth the removal would reach in each of the locations.
21. If removed soils will be disposed of off-site and/or new soils brought in, please provide reports of the dates, personnel, methods, and findings from any cultural resources surveys of the disposal and borrow sites, or explain why no surveys are needed. If disposal and borrow sites are not commercial operations and consequently have not been surveyed for cultural resources, please conduct such surveys and provide the personnel qualifications, methods, and findings to staff.

BACKGROUND

Both alternative routes for the 230 kV overhead transmission line interconnecting the Vernon Power Plant with the Laguna Bell substation may necessitate the burial of segments of existing 66 kV overhead transmission lines along Randolph Street (pp. 5-5, 5-6), but no details of this option were given in the AFC. To assess the potential impact of these trenches on possible buried cultural resources, staff needs to know the location of the segments which could be buried.

DATA REQUESTS

22. Please provide a map showing the transmission line segments which could be placed underground.

BACKGROUND

The applicant sent letters to 11 Native American individuals and groups on October 4, 2005, seeking information on traditional cultural properties and archaeological sites on or near the

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proposed VPP site. AFC Supplement 8.3A includes the responses of Native Americans up through February 13, 2006. Staff needs to know if the applicant has received any additional responses from Native Americans since that time. In addition, the Native American Heritage Commission (NAHC), which provided the applicant with a list of Native Americans with historic ties to the VPP project area, advises, "If a response has not been received within two weeks of notification, the Commission requests that you follow-up with a telephone call to ensure that the project information has been received." Native American contact efforts by the applicant are outlined in AFC section 8.3.3.5.3, but that discussion provides no indication that the officially requested follow-up telephone calls were carried out.

DATA REQUESTS

23. Please provide copies of any communications received from Native Americans since February 13, 2006, regarding the VPP.
24. Please make the requested follow-up telephone calls and provide Energy Commission staff with copies of telephone logs of the calls, documenting that the letters were received and summarizing any verbal information (or lack of information) provided by Native Americans.

**Vernon Power Plant Project
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(06-AFC-4)**

Technical Area: Noise and Vibration

Author: Steve Baker

BACKGROUND

Staff evaluates the likelihood that the project will comply with applicable noise laws, ordinances, regulations and standards, (LORS), and that the project will not create significant adverse impacts on nearby sensitive receptors. The Application adequately describes nearby sensitive receptors, six residences within the Vernon City Limits that lie approximately 1,000 feet NE of the project site, and describes LORS related to the City of Vernon. The application, however, fails to provide such information for the residences that lie approximately 1,700 feet E of the site in the City of Maywood, and for the residences that lie approximately 2,100 feet SW of the site in the City of Huntington Park (see AFC Figures 8.4-1 and 8.5-1). These residences are sufficiently near the project site that noise impacts are possible and must therefore be evaluated.

DATA REQUEST

25. Please describe (by quantity and distance from the project site) the residences to the east of the project site in Maywood, and to the southwest of the site in Huntington Park.
26. Provide ambient noise measurements for these residential neighborhoods as required in the Siting Regulations, Appendix B(g)(4)(B).
27. Provide a description of noise LORS of the Cities of Maywood and Huntington Park as required in the Siting Regulations, Appendix B(h)(1)(A).
28. Provide contact information for the Cities of Maywood and Huntington Park as required in the Siting Regulations, Appendix B(h)(3).
29. Provide estimated levels of project noise, during both construction and operation, at these residential neighborhoods as required in the Siting Regulations, Appendix B(g)(4)(D).

**Vernon Power Plant Project
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(06-AFC-4)**

Technical Area: Soils and Water Resources

Author: Ellie Townsend-Hough/John Kessler

BACKGROUND – STORMWATER DRAINAGE AND EROSION CONTROL

Construction and operation of the Vernon Power Plant (VPP) may induce water and wind erosion at the 13.7-acre generation site, the adjacent 13.3-acre construction laydown/parking site, and along its linear facilities. Both the generation and laydown/parking sites are currently developed with existing industrial buildings and paving, which will be demolished and removed by the current property owner prior to initiating VPP construction. While the demolition and debris removal activity is considered a pre-project activity separate from VPP, the initial conditions for VPP construction will consist of recently disturbed soils, more vulnerable to erosion. Considering stormwater from the existing site already drains into the Los Angeles County Department of Public Works (LACDPW) storm drainage system, the quality of runoff during the approximately 2 years of construction can be significantly degraded until final drainage and erosion control measures applicable for VPP operations are employed. Discharge of stormwater runoff during VPP construction and operation is subject to a Flood Permit from LACDPW. This permit would specify limitations for flow rates and any requirements for water quality, and approval by the City of Vernon of a Drainage Concept and Stormwater Quality Plan.

In Appendix 8.14B of the AFC, the applicant has prepared an Administrative Draft of the Vernon Power Plant Construction Drainage, Erosion, and Sediment Control/Stormwater Pollution Prevention Plan (Construction DESC/SWPPP). The purpose of the draft Construction DESC/SWPPP during the AFC process is to provide staff with a document of sufficient detail that clearly identifies all potential impacts and mitigation measures, ensures that only the minimum area necessary is disturbed, protects disturbed and sensitive areas, retains and controls sediment on-site, and minimizes off-site effects of water and wind erosion. The project must comply with all applicable LORS and incorporate all related requirements of other responsible agencies, to include Los Angeles County Department of Public Works (LACDPW), City of Vernon, and the State Water Resources Control Board/Regional Water Quality Control Board (SWRCB/RWQCB).

The VPP Construction DESC/SWPPP provides much of the needed information for staff to evaluate the project. However, Commission staff and potentially LACDPW, requires some additional information on a conceptual planning level to assure proposed mitigation measures are adequate to avoid significant adverse impacts.

DATA REQUEST

30. Figure 1-4 in the Construction DESC/SWPPP provides a Conceptual Drainage Plan applicable to operations rather than construction. Please provide a Conceptual Drainage Plan applicable to construction, encompassing the combined total 27-acre generation and laydown/parking sites. The Conceptual Drainage Plan should indicate temporary drainage patterns, types and placement of proposed Best Management Practices (BMPs) for erosion control measures, including any detention/sediment control basins and the path for any offsite discharge into the LACDPW's stormwater drainage system.

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31. Provide an existing Site Topography Map, and a conceptual Rough Grading Plan, corresponding to the Conceptual Construction Drainage Plan as requested above.
32. Provide the flow rate and water quality design criteria and requirements for discharge of stormwater runoff during VPP construction and operation as would be specified under a Flood Permit from LACDPW.
33. Provide the flow rate and water quality design criteria and requirements for discharge of stormwater runoff during VPP construction and operation as is specified by City of Vernon of a Drainage Concept and Stormwater Quality Plan.
34. Provide calculations of storm water flow rate estimates for construction and operational phases as applicable to demonstrate compliance with design criteria and requirements for both LACDPW and City of Vernon.
35. Address the need for a stormwater detention/sediment control basin during construction. If needed, please provide the calculations for sizing the basin and note the location of the basin on the Conceptual Construction Drainage Control Plan.
36. Appendix B of the Construction DESC/SWPPP provides calculations for sizing the stormwater detention basin for the operational phase of the project applicable to only the generation site area of 13.7 acres. If during operations the 13.3-acre laydown/parking area will combine its drainage with the generation area, please provide calculations supporting the total 27-acre drainage area. If the two areas will drain separately into the LACDPW storm drain system, please provide conceptual drainage plans and calculations supporting this configuration to demonstrate compliance with the design criteria and requirements of LACDPW and City of Vernon.

BACKGROUND – WATER SUPPLY

Recycled water for VPP industrial purposes will be provided by Central Basin Municipal Water District (CBMWD). Backup industrial water supply will consist of potable water from the City of Vernon's potable water system. The VPP is estimated to require an average annual supply of 6,266 acre-feet/year of recycled water, with about 96% used for cooling, and the balance used for inlet air-cooling to the gas turbines, makeup water for the Heat Recovery Steam Generators, and landscape irrigation. The existing uses of recycled water within CBMWD's service area are primarily for landscape irrigation, representing about 85% of the total, with the balance used for industrial purposes. Industrial use is expected to significantly increase in the future, as particularly attributable to the Malburg Generating Station and VPP. As demands for regional and statewide fresh water supplies increase with the growing population, there will be an increasing demand for recycled water to replace deliveries for non-potable uses of water that have been traditionally supplied with fresh water.

DATA REQUEST

37. AFC Table 7.3-1 provides the Projected Recycled Water Use within CBMWD Service Area through the year 2030. However, there is no comparison of the available supply for

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meeting those demands. Please provide projections through 2030 of the expected supply of recycled water available to the CBMWD.

38. Please provide a projected monthly schedule for VPP recycled water demands in acre-feet/month for both the average and peak annual water demand conditions.
39. Please describe any seasonal variations in the availability of CBMWD's recycled water, and the ability of CBMWD to meet both VPP's average and peak annual water demands.
40. Based on the historical reliability of the CBMWD's recycled water system, please describe the circumstances and expected frequency that VPP may need to depend on potable water for meeting its industrial water supply, and the associated annual volume of potable water for meeting VPP industrial purposes.
41. Please explain the need for VPP to secure a recycled water supply contract amount of 13,500 acre-feet/year when its average annual use is estimated to be 6,266 acre-feet/year.

BACKGROUND - WASTEWATER

Table 8.14-5 of the AFC provides a Summary of Average Water Quality Characteristics for VPP Wastewater Compared to Los Angeles County Sanitation District's (LACSD) Industrial Discharge Limits, excluding Total Dissolved Solids (TDS). The AFC describes the need to discharge cooling water in order to maintain the concentration of dissolved solids within acceptable ranges. Cooling tower blowdown will be discharged to LACSD's sanitary sewer line and be subject to specifications of an Industrial Wastewater Discharge Permit. In many cases, power plants are limited in the cycles of concentration of cooling water subject to the discharge limits for TDS.

DATA REQUEST

42. Please provide the estimated concentration of TDS for the VPP wastewater compared to Los Angeles County Sanitation District's (LACSD) industrial discharge limits.
43. Provide a comparison for managing industrial wastewater from a Zero-Liquid Discharge System versus the proposed discharge to LACSD's sanitary sewer system. For each alternative, please include a description of the process and equipment necessary, operational and disposal issues, a brief preliminary environmental assessment, advantages/disadvantages, and capital and operation/maintenance costs.

**Vernon Power Plant Project
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(06-AFC-4)**

Technical Area: Waste Management

Author: Ellie Townsend-Hough

BACKGROUND

Staff needs additional information in order to assess potential impacts from soil excavation during construction of the proposed Vernon Power Project. Section 8.13.3 of the AFC Waste section states that the Phase II Environmental Site Assessment (ESA) detected soil contamination by Stoddard solvent at the proposed project site.

DATA REQUESTS

44. Please provide 7 copies of the Vernon Power Plant Phase II ESA.

**VERNON POWER PLAN
(06-AFC-4)
DATA REQUESTS**

Technical Area: Traffic and Transportation

Author: James Adams

BACKGROUND

Staff relies on information in the Application for Certification (AFC) to assess the existing traffic and transportation system near the proposed power plant site, and to analyze the impacts from project construction and operation. On pg. 8.10-2 of the Traffic and Transportation section of the AFC, it notes that construction personnel will commute to four construction parking areas. The location or size of these areas is not provided. However, pg. 8.10-19 has a statement that construction parking areas will be located on a separate 13.3 acre parcel south of the plant site.

DATA REQUEST

45. Please explain the discrepancy between the two statements and provide the location and dimensions of the parking areas on Figure 8.10-2 (Local Roadways).

**VERNON POWER PLAN
(06-AFC-4)
DATA REQUESTS**

Technical Area: Visual Resources

Author: Gary Collard

BACKGROUND

The AFC's analysis of KOP 2, relative to the Randolph Street transmission line, indicates that the proposed 230 kV line would replace the existing 66 kV line with "new poles spaced twice the distance as the existing poles, reducing the visual clutter on Randolph Street." In the KOP 2 simulation, the new poles appear to be in the same general location, with the same spacing, as the existing poles, and the existing poles are reduced in height but still in place (apparently to provide power to the businesses and residences along the street). Therefore the AFC's analysis of the project's pole construction and replacement activities, and the associated visual impact, does not appear to match the simulation provided.

DATA REQUEST

46. Please provide a corrected KOP 2 simulation or a corrected AFC analysis of pole construction and replacement activities, and the associated visual impact.

BACKGROUND

The AFC indicates that the Randolph Street transmission line route will traverse a distance of 4.4 miles, through several cities, between the proposed power plant and the substation located in the City of Bell Gardens. It appears there are numerous residences, businesses, and a high school, among other uses, along Randolph Street which will have a view of the proposed power line. Portions of the 4.8-mile River Route transmission line, particularly the last mile along Randolph Street, (KOP 3) will also be visible from residences, businesses and the high school along Randolph Street. The AFC does not identify the number of residences, businesses and other land uses that potentially will be affected by the visual impact of the proposed transmission lines.

DATA REQUEST

47. Please provide the number of residences, businesses, and other land uses that could potentially be affected by the visual impact of the proposed Randolph Street and River Route transmission corridors.

**VERNON POWER PLAN
(06-AFC-4)
DATA REQUESTS**

Technical Area: Land Use

Author: David Flores

BACKGROUND

On Pg.8.10-19 of the Traffic and Transportation analysis, the AFC indicates that construction parking areas will be located on one or more parcels, but this concept is not discussed in the land use section of the AFC.

DATA REQUEST

48. Please provide a land use analysis of each of the parcels to be used as construction parking area. Discussion should include zoning and general plan designation of the sites and whether the sites would be leased or owned by the applicant.

BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT COMMISSION OF THE
STATE OF CALIFORNIA

APPLICATION FOR CERTIFICATION
FOR THE VERNON POWER PLANT PROJECT
BY THE CITY OF VERNON

DOCKET NO. 06-AFC-4
PROOF OF SERVICE LIST
(REVISED 10/4/06)

INSTRUCTIONS: All parties shall (1) file a printed, original signed document plus 12 copies OR file one original signed document and e-mail the document to the Docket address below, **AND** (2) all parties shall also send a printed OR electronic copy of the document, plus a proof of service declaration, to each of the entities and individuals on the proof of service list:

CALIFORNIA ENERGY COMMISSION
Attn: DOCKET NO. 06-AFC-4
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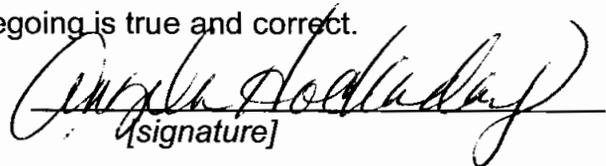
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DECLARATION OF SERVICE

I, Angela Hockaday, declare that on October 6, 2006, I deposited the required copies of the attached Data Requests for the Vernon Power Plant Project, in the United States mail at Sacramento, California with first-class postage thereon fully prepaid and addressed to those identified on the Proof of Service list above.

I declare under penalty of perjury that the foregoing is true and correct.


[signature]