CALPINE

LOS ESTEROS CRITICAL ENERGY FACILITY
800 THOMAS FOON CHEW WAY
SAN JOSE, CALIFORNIA 95134

#34895

03-AFC-2

DOCKET
01-AFC-12C
DATE JUN 22 2005
RECD. JUN 28 2005

June 22, 2005

Mr. Lance Shaw
Compliance Project Manager
Systems Assessment & Facility Siting Division
California Energy Commission
1516 Ninth Street, MS-15
Sacramento, CA 95814

RE: PETITION TO AMEND LOS ESTEROS CRITICAL ENERGY FACILITY'S CONDITIONS OF CERTIFICATION
APPLICATION 01-AFC-12

Dear Mr. Shaw:

Pursuant to Section 1769 of the California Energy Commission (CEC) Siting Regulations, Los Esteros Critical Energy Facility (LECEF), hereby submits the attached Petition to amend LECEF's Conditions of Certification to include administrative changes that have been requested of the BAAQMD. The changes to the Title V and Permit to Operate have been previously discussed with the BAAQMD and will not have any adverse impacts to the environment or the public.

Please contact me at (408) 361-4953 if you have any questions regarding this submittal.

Sincerely,

Dana Petrin
Compliance Manager
Calpine South Bay Projects

Enclosures

PETITION FOR INSIGNIFICANT AMENDMENTS TO OPERATIONS CONDITIONS OF CERTIFICATION

As required by Section 1769 of the CEC Siting Regulations, LECEF hereby submits the following discussion to amend Conditions AQ-19 b., AQ-26, and AQ-27 of LECEF's Application for Certification 01-AFC-12.

Pursuant to Section 1769 (a)(1)(A) and (B), a description of the proposed modifications, including new language for affected conditions and the necessity for the modifications is required.

The modifications proposed to the conditions of certification are as follows:

To maintain consistency throughout the Calpine plants and to implement an ammonia monitoring technique that is more accurate and operator friendly, we are requesting that Condition AQ-19b be changed to require the monitoring of the ammonia slip as a concentration level as opposed to a molar ratio. This calculation has been approved by the BAAQMD and includes a bias factor, which relates the calculation to the results of each source testing conducted at the plant. In order to reflect the current calculation being used to monitor ammonia slip as agreed to by the BAAQMD, LECEF proposes to change the Application for Certification Condition as follows:

AQ-19b. Ammonia emissions from the gas turbine shall not exceed 10 ppmvd @ 15% O2 (three-hour rolling average), except during periods of startup and shutdown as defined in this permit. The ammonia emission concentration shall be verified by a District-approved corrected ammonia slip calculation. The correction factor shall be determined during any District required source test.

The changes to condition AQ-24a and b are being proposed to correct the hourly and daily maximum heat input limits to accurately reflect the operating capacity of the LM6000. These changes will not affect emissions at the plant.

AQ-24 Operational Limits: In order to comply with the emission limits of this rule, the owner/operator shall comply with the following operational limits:

a. The heat input to any gas turbine shall not exceed:
b. Hourly: 500 MMBtu/hr
   Daily: 12,000 MMBtu/day
   Four Turbines
   Annual: 17,520,000 MMBtu/year

Since our gas supplier cannot guarantee meeting the total sulfur content of 0.25 gr/100scf, we would like to request revising the limit in AQ-24c to 1.0 gr/100 scf as follows:

AQ-24

c. Only PUC Quality natural gas (General Order 58-a) shall be used to fire the gas turbine. The natural gas shall not contain total sulfur in concentrations exceeding 1.0 gr./100 scf.

This change will not affect SO2 emission limits established in this permit.

The changes to condition AQ-26 are being proposed based on the infrequent operation of these peaking facilities. The District typically imposes an annual source test requirement on facilities assuming that the facility is in operation most of the year. The purpose of the source testing is to determine compliance with emission limits as a facility's equipment is operated over time. Since this facility is a peaking facility, it makes sense to only require source testing every 8,000 hours of operation, which is essentially equivalent to one year of operation. We are also requesting a time frame of sixty days from the completion of a source test to submit the results to the District. Past

experience has indicated that source test vendors require more than thirty days to complete analyses and provide a report. Calpine proposes to amend Condition AQ-26 as follows:

AQ-26. Source Testing/RATA: Within sixty days after startup of the gas turbines, and at a minimum on an annual basis thereafter, a relative accuracy test audit (RATA) must be performed on the CEMS in accordance with 40 CFR Part 60 Appendix B Performance Specifications.A source test shall be performed at least every 8,000 hours of gas turbine operation. Additional source testing may be required at the discretion of the District to address or ascertain compliance with the requirements of this permit. The written test results of the source tests shall be provided to the District within sixty days after testing. The complete test protocol shall be submitted to the District no later than 30 days prior to testing, and notification to the District at least ten days prior to the actual date of testing. The source test protocol shall comply with the following: measurements of NOx, CO, POC, and stack gas oxygen content in accordance with ARB Test Method 100; measurements of PM10 in accordance with ARB Test Method 201 and 202; and measurements of ammonia in accordance with Bay Area Air Quality Management District test method ST-1B. Alternative test methods, and source testing scope, may also be used to address the source testing requirements of the permit if approved in advance by the District. The owner/operator shall include initial and annual source tests parameters specified in the approved test protocol, and at a minimum include the following:

Calpine would like to amend Condition AQ-27 to allow for the use of a calculation based on the total sulfur levels in the fuel to demonstrate compliance with SAM emission limits in Condition AQ-23. As previously discussed with BAAQMD, the method for measuring sulfuric acid mist would not result in a detection limit low enough to prove compliance with the emissions limits in Condition AQ-23. We are currently submitting calculations based on the fuel gas sulfur to comply with this condition. As long as we are in compliance with our fuel gas sulfur limit listed in Condition AQ-24 c., the limit contained in AQ-23 listed above cannot be exceeded. Therefore, as long as compliance is demonstrated with Condition AQ-23 there is no need to conduct further source testing or calculations to prove compliance with this condition. We would like AQ-27 to read as follows:

AQ-27 Within 60 days of start-up of the LECEF the owner/operator shall demonstrate compliance with the SAM levels in AQ-23 using the calculation method based on total sulfur levels in the fuel and a speciation based on the EPA guidance document "Emergency Planning and Community Right To Know Act – Section 313-Guidance for Reporting Sulfuric Acid".

Based on the fuel monitoring schedule referenced in condition AQ-29, a fuel sulfur analysis may not be required in all quarters. We suggest that this condition be revised to:

AQ-34g Results of required fuel analyses for HHV and total sulfur content obtained during the quarter. (Basis: record keeping & reporting).

Since offsets have already been provided, LECEF proposes to delete condition AQ-35.

Pursuant to Section 1769 (C), a discussion is required on if the modification is based on information that was known by the petitioner during the certification proceeding, and an explanation of why the issue was not raised at that time.

The changes being requested to AQ-19b, 24, 26 and 27 are based on new information that was learned as a result of operating experience gained at the facility and was not known at the time of certification. Changes to AQ-28, 34, and 35 have been requested to clarify requirements and maintain consistency with requested changes to the BAAQMD and Title V permits.

Pursuant to Section 1769 (D), a discussion is required on whether the modification is based on new information that changes or undermines the assumptions, rationale, findings, or other bases of the final decision, and explanation of why the change should be permitted.

The proposed changes to AQ-19b, 24, 26 and 27 are based on information learned after the completion of the certification process during the commissioning and operation phase of the project. Changes to AQ-28, 34, and 35 are additional minor clarifications. Since the changes are administrative and improve the accuracy of compliance determinations, Calpine believes the proposed changes do not undermine the assumptions, rationale, findings or other bases of the final decision.

Pursuant to Section 1769 (E), an analysis of the impacts the modifications may have on the environment and proposed measures to mitigate any significant adverse impacts is required.

The proposed changes to the conditions of certification do not result in any significant adverse environmental impact.

Pursuant to Section 1769 (F), a discussion of the impact of the modification on the facility's ability to comply with applicable laws, ordinances, regulations, and standards is required.

The proposed amendments will have a positive impact on the facility's ability to comply with applicable laws, ordinances, regulations, and standards. The proposed change in the calculation method for ammonia slip is more accurate than previous methods used. The proposed change to the total sulfur calculation method enables the facility to demonstrate compliance with SAM levels, whereas, the original source test method could not, as the minimum analytical detection limits were too high.

Pursuant to Section 1769 (G), a discussion of how the modifications affect the public is required.

Calpine asserts that the proposed modifications to the conditions of certification will not adversely affect the public.

Pursuant to Section 1769 (H), a list of property owners potentially affected by the modification is required.

The proposed amendments are administrative in nature, therefore no property owners will be affected by the modification.

Pursuant to Section 1769 (I), a discussion of the potential effect on nearby property owners, the public and the parties in the application proceedings is required.

The proposed amendments will have no impact on property owners, the public, or any other parties.

CALPINE

LOS ESTEROS CRITICAL ENERGY FACILITY
800 THOMAS FOON CHEW WAY
SAN JOSE, CALIFORNIA 95134

June 22, 2005

Mr. Dennis Jang, Engineer
Permit Services Division
Bay Area Air Quality Management District
939 Ellis Street
San Francisco, CA 94109

RE: Request for Amendment to Major Facility Review Permit, Facility #B3289
Los Esteros Critical Energy Facility
Permit to Operate No. 3213, Plant No. 13289

Dear Mr. Jang:

The Los Esteros Critical Energy Facility (LECEF) would like to request amendments to the LECEF Major Facility Review Permit, Facility #B3289 and BAAQMD Permit to Operate No. 3213. The purpose of this request is to formalize previous communications with the District and ask that the following administrative changes be incorporated in the BAAQMD and Title V permits:

1. Page 27: Permit Conditions: Condition 27. Amend Condition 27 to allow for the use of a calculation based on the total sulfur levels in the fuel to demonstrate compliance with SAM emission limits in Condition 23. The method for measuring sulfuric acid mist would not result in a detection limit low enough to prove compliance with the emission limits. Based on the current sulfur content of the facility's natural gas and assuming 100% conversion of sulfur to SAM, it is impossible to emit 7 tpy. We are currently submitting calculations based on the fuel gas sulfur to comply with this condition. As long as we are in compliance with our fuel gas sulfur limit listed in Condition 24b, the limits in Condition 23 cannot be exceeded. Therefore, we would like Condition 27 to read as follows:

> Within 60 days of start-up of the LECEF the owner/operator shall demonstrate compliance with the SAM levels in Condition number 23 using the calculation method based on total sulfur levels in the fuel and a speciation based on the EPA guidance document "Emergency Planning and Community Right To Know Act – Section 313-Guidance for Reporting Sulfuric Acid". The calculation method and the most recent fuel analysis are attached.

2. Page 27: Permit Conditions: Condition 29. Delete condition. 40 CFR Part 60 Subpart GG was revised July 14, 2004 and no longer requires daily or periodic fuel gas sulfur monitoring if the fuel meets the definitions of natural gas (20 grains sulfur per 100 scf and either > 70% methane or between 950 and 1100 Btu/scf). The fuel supplier (PG&E) transportation contract limits gas to 1 grain per 100 scf, and the gas heating value was verified as part of the CEMS certification report. The following comments were originally submitted via e-mail on February 6, 2004 in response to the draft Title V permit:

3. Page 5: Monitoring Reports. This condition requires the submittal of a semi-annual monitoring report to the District and condition 34 requires the submittal of a similar report quarterly. We request that these reporting requirements be combined by either eliminating the need to submit the semi-annual or quarterly reports.

4. Page 6 & 8: Miscellaneous Conditions and Table II-A. The turbine capacities shown in Table II-A are listed as 45 MW. As noted in the ATC and FDOC documents, 45 MW is the nominal output for these turbines. The turbine capacities shown in Table II-A should be revised to 49.9 MW, or, reference to the load should be moved to the Description column in the table (i.e., the description of S-1 would be: "Gas Turbine Generator, Natural Gas fired with water injection, nominally 45 MW").

The heat input capacities shown in Table II-A are listed as 472.6 MMBtu/hr. Under certain operating conditions, the LM6000 could potentially exceed this rate. The heat input capacity should be revised to 500 MMBtu/hr in this table and elsewhere in the document. This change does not affect the emission limits or annual heat input limits established in the permit.

5. Page 6: Accidental Release. Delete condition. 40 CFR Part 68 is not applicable since the facility uses a 19% aqueous ammonia solution, which is less than the threshold of 20%.

6. Pages 20-23: Permit Conditions: Conditions 1-11. Conditions 1 through 11 are valid during the commissioning period. Because the facility commissioning has been completed, these conditions can be deleted from the permit.

7. Page 24: Permit Conditions: Condition 19(b). Based on prior discussions with District staff, compliance with the ammonia slip limit may be demonstrated by calculating the slip based on the inlet NOx concentration, stack NOx concentration, total heat input and ammonia injection rate. This calculation will be adjusted using a correction factor that is determined during any required source test. We suggest that the condition be revised to:

> Ammonia emissions from the gas turbine shall not exceed 10 ppmv @ 15% O2 (3-hour rolling average), except during periods of startup and shutdown as defined in this permit. The ammonia emission concentration shall be verified by a District approved corrected ammonia slip calculation. The correction factor shall be determined during any required source test. (basis: BACT)

8. Page 24: Permit Conditions: Condition 19(d). POC emissions are not monitored. Delete reference to 3-hour rolling average from the condition.

9. Page 25: Permit Conditions: Condition 22. POC limit of 114 lbs/day is inconsistent with the 113 lbs/day in the PTO. Limits should be revised to be consistent.

10. Page 26: Permit Conditions: Condition 24(a). Heat input limit should be revised to 12,000 MMBtu/day to be consistent with the hourly maximum heat input limit of 500 MMBtu/hr. This change does not affect the emission limits or annual heat input limits established in the permit.

11. Page 26: Permit Conditions: Condition 24(b). This condition limits the natural gas total sulfur content to 0.25 gr/100 scf. Because our gas supplier cannot guarantee meeting this limit, we request revising the limit to 1.0 gr/100 scf. This limit is consistent with those required at other facilities in the district. This change does not affect the SO2 emission limits in this permit.

12. Page 26: Permit Conditions: Condition 26. This condition requires a source test to be conducted annually. Because this facility does not operate continuously, we request that the source test frequency be revised to every 8,000 operating hours.

This condition requires the source test results to be submitted to the District within 30 days after completion of the tests. We request that this deadline be extended to 60 days after completion of the tests. Past experience has indicated that source test vendors generally require more than 30 days to complete their analyses and provide the final reports.

This condition requires that PM10 testing shall be conducted in accordance with ARB Test Method 5. We request that EPA Test Method 201 and 202 be used instead.

We request that the SOx source test requirements be clarified such that data can be obtained via calculation rather than stack test.

Incorporating the changes referenced above, we suggest that the condition be revised to:

> Source Testing/RATA: Within sixty days after startup of the gas turbines, and at a minimum on an annual basis thereafter, the owner/operator shall perform a relative accuracy test audit (RATA) on the CEMS in accordance with 40 CFR Part 60 Appendix B Performance Specifications. A source test shall be performed at least every 8,000 hours of gas turbine operation. Additional source testing may be required at the discretion of the District to address or ascertain compliance with the requirements of this permit. The written test results of the source tests shall be provided to the District within sixty days after testing. A complete test protocol shall be submitted to the District no later than 30 days prior to testing, and notification to the District at least ten days prior to the actual date of testing shall be provided so that a District observer may be present. The source test protocol shall comply with the following: measurements of NOx, CO, POC, and stack gas oxygen content shall be conducted in accordance with ARB Test Method 100; measurements of PM_{10} shall be conducted in accordance with EPA Test Methods 201 and 202; and measurements of ammonia shall be conducted in accordance with Bay Area Air Quality Management District test method ST-1B. Alternative test methods, and source testing scope, may also be used to address the source testing requirements of the permit if approved in advance by the District. The initial and annual source tests shall include those parameters specified in the approved test protocol, and shall at a minimum include the following:

a. NOx– ppmvd at 15% O2 and LB/MMBtu (as NO2);
b. Ammonia – ppmvd at 15% O2 (Exhaust);
c. CO – ppmvd at 15% O2 and LB/MMBtu (Exhaust);
d. POC – ppmvd at 15% O2 and LB/MMBtu (Exhaust);
e. PM_{10} – LB/hr (Exhaust);
f. SOx – LB/hr (Exhaust);
g. Natural gas consumption, fuel High Heating Value (HHV), and total fuel sulfur content;
h. Turbine load in megawatts;
i. Stack gas flow rate (SDCFM) calculated according to procedures in U.S. EPA Method 19.
j. Exhaust gas temperature (°F)
k. Ammonia injection rate (LB/hr or moles/hr)
l. Water injection rate for each turbine at S-1, S-2, S-3, & S-4 (Basis: source test requirements and monitoring)

13. Page 27: Permit Conditions: Condition 27. Delete condition. This condition requires semi-annual testing for sulfuric acid mist (SAM) to verify compliance with the combined (S-1 through S-4) emission limit of 7 tpy. Based on current sulfur content of natural gas and assuming 100% conversion of sulfur to SAM, it is impossible to emit 7 tpy.

14. Page 29: Permit Conditions: Condition 35. Delete condition. Offsets have already been provided.

15. Page 46 (and cover page): Acid Rain Permit. The plant site location, mailing address, and contact person should be changed to:

Location:	800 Thomas Foon Chew Way San Jose, CA 95134
Mailing Address:	3800 Cisco Way San Jose, CA 95134
Contact Person:	Dana Petrin (408) 592-7915

We have enclosed a check in the amount of $332.00, which includes the $259.00 filing fee and $73.00 administrative amendment fee per Schedule P. Should you have any questions or require further information regarding the requested amendments, please contact me at (408) 361-4953.

Sincerely,

Dana Petrin
Compliance Manager
South Bay Projects

cc: David Williams
Barbara McBride
Scott Vickers
Environmental File LECEF A3.1

Permit Services Division
Bay Area Air Quality Management District
939 Ellis Street, San Francisco, CA 94109 • 749-4990

Stationary Source Summary
Page 1

FACILITY NAME: Los Esteros Critical Energy Facility	FACILITY ID: # B1180

♦ DISTRICT USE ONLY ♦

Application #: _____ **Application Received:** _____

Application Filing Fee: _____ **Application Deemed Complete:** _____

I. FACILITY IDENTIFICATION

1. Facility Name: Los Esteros Critical Energy Facility
2. Four digit SIC Code: 4911 EPA Plant ID:
3. Parent Company (if different than Facility Name): Calpine Corporation
4. Mailing Address: 3800 Cisco Way, San Jose, CA 95134
5. Street Address or Source Location: 800 Thomas Foon Chew Way, San Jose, CA 95134
6. UTM Coordinates (if required):
7. Source Located within 50 miles of the state line: ☐ Yes X No
8. Source Located within 1000 feet of a school: ☐ Yes X No
9. Type of Organization ☐ Corporation ☐ Sole Ownership ☐ Government ☐ Partnership ☐ Utility Company X Other Limited Liability Company
10. Legal Owner's Name: Calpine Corporation
11. Owner's Agent name (if any):
12. Responsible Official: Robert McCaffrey, General Manager
13. Plant Site Manager/Contact: Robert McCaffrey, General Manager Telephone #: 408-847-5328 ext.1404
14. Type of Facility: Power plant
15. General description of processes/products: Natural gas-fired turbine power plant for generation of electricity
16. Is a Federal Risk Management Plan pursuant to Section 112(r) required? ☐ Yes X No
(If application is submitted after Risk Management Plan due date, attach verification that the plan is registered with the appropriate agency.)

Permit Services Division
Bay Area Air Quality Management District
939 Ellis Street, San Francisco, CA 94109 • 749-4990

Stationary Source Summary
Page 2

FACILITY NAME: Los Esteros Critical Energy Facility	FACILITY ID: # B 3289

II. TYPE OF PERMIT ACTION

	CURRENT PERMIT (permit number)	EXPIRATION (date)
☐ Initial Title V Application		
☐ Permit Renewal		
☐ Significant Permit Modification		
☐ Minor Permit Modification		
X Administrative Amendment	3213	8/31/2004

III. DESCRIPTION OF PERMIT ACTION

1. Does the permit action requested involve:
   - ☐ Temporary Source
   - X Voluntary Emissions Caps
   - X Acid Rain Source
   - ☐ Alternative Operating Scenarios
   - X CEM's
   - X Abatement Devices
   - ☐ Source Subject to MACT Requirements [Section 112]
   - ☐ Source Subject to Enhanced Monitoring

2. Is source operating under a Compliance Schedule? ☐ Yes X No

3. For permit modification, provide a general description of the proposed permit modification:
   - Rewrite ammonia slip condition.
   - Request revising source test frequency to every 8000 operating hours.
   - Amend sulfuric acid mist compliance condition
   - Revise heat input limits, equipment description, and fuel gas sulfur limit

Signature of Responsible Official

Robert McCaffrey
Name of Responsible Official

Date: 6/22/2005

Summary2/myl

BAY AREA AIR QUALITY MANAGEMENT DISTRICT

939 Ellis Street . . . San Francisco, CA 94109
(415) 749-4990 . . . FAX (415) 749-5030
www.baaqmd.gov

FORM P-101B

AUTHORITY TO CONSTRUCT/ PERMIT TO OPERATE

Application Information

Plant No. B3289, Application No. 3213	NAICS 221112 (leave blank if unknown)
Business Name Los Esteros Critical Energy Facility	
Equipment Description Natural Gas Fired Combustion Turbine Generators	
If you qualify for the District's **Accelerated Permitting Program,** (see reverse for criteria), check here ☐ If you are applying to permit **portable equipment**, in accordance with Regulation 2-1-220, check here ☐	

New Plant Information

If you have not previously been assigned a Plant Number by the District or if you want to update any Plant data that you have previously supplied to the District, please complete the New Plant Information box below.

Plant Address (equipment location) 800 Thomas Foon Chew Way		
City San Jose	State CA	Zip 95134
Mailing Address 3800 Cisco Way		
City San Jose	State CA	Zip 95134
Plant Contact Mark Breen		
Title Operations and Maintenance Manager		
phone 408-456-2690 x1612	Fax 408-456-0421	
E-mail Address dpetrin@calpine.com		

Application Contact Information (*if different from plant contact*)

All correspondence regarding this application will be sent to the plant contact person unless you wish to designate a different contact for this application. If you are changing the plant contact person, complete the "New Plant Information" Section.

Application Contact		
Title/Company		
Mailing Address		
City	State	Zip
Telephone	Fax	
E-mail Address		

Small Business Certification

You are entitled to a reduced permit fee if you qualify as a small business as defined by BAAQMD Regulation 3. In order to qualify, you must certify that your business meets all of the following criteria:

☐ The business does not employ more than 10 persons and its gross annual income does not exceed $500,000.

☐ The business is not an affiliate of a non-small business. (Note: a non-small business employs more than 10 persons and/or its gross income exceeds $500,000.)

Signature: _____ Date: _____

Accelerated Permitting Program

The Accelerated Permitting Program entitles you to install and operate qualifying sources of air pollution and abatement equipment **without waiting for the District to issue a Permit to Operate**. In order to participate in ;s program you must certify that your project will meet all of the following criteria. Please acknowledge each .m by checking each box and signing below.

- ☐ Uncontrolled emissions of any single pollutant are each less than 10 lb/highest day, or the equipment has been precertified by the BAAQMD.
- ☐ Emissions of toxic compounds do not exceed the trigger levels identified in Table 2-1-316 (see Regulation 2, Rule 1).
- ☐ The project is not subject to public notice requirements (source is either more than 1000 ft. from the nearest school, or source does not emit any toxic compound in table 2-1-316).
- ☐ For replacement of abatement equipment, the new equipment must have an equal or greater overall abatement efficiency for all pollutants than the equipment being replaced.
- ☐ For alterations of existing sources, for all pollutants the alteration does not result in an increase in emissions.
- ☐ Payment of applicable fees (the minimum permit fee to install and operate each source). See Regulation 3 or contact the Permit Services Division for help in determining your fees..

Signature: Date:

All Applications

All applications should contain the following additional information:

- ☐ Completed data form(s) for each piece of equipment (data forms listed below)
- ☐ A facility map, drawn roughly to scale, that locates the equipment and its emission points
- ☐ Project/equipment description, manufacturer's data
- ☐ Pollutant flow diagram
- ☐ Discussion/calculations relating to emissions from the equipment
- ☐ If a new Plant, a local street map showing the location of your business

:reby certify that the sources in this permit application: *(check one)*

☐ Are **X** Are not within 1,000 feet of the outer boundary of the nearest school

Has an Environmental Impact Report (EIR) or other California Environmental Quality Act (CEQA) document been prepared for this project? **X** no ☐ yes If yes, by whom? _____

IMPORTANT: Under the California Public Records Act, all information in your permit application will be considered a matter of public record and may be disclosed to a third party. If you wish to keep certain items separate as specified in Regulation 2, Rule 1, Section 202.7, please complete the following steps:

(a) Make a copy of your permit application with the confidential information blanked out. Label this copy "Public Copy".
(b) Label the original copy "Confidential." Circle all confidential items on each page. Label each page with confidential information "Confidential".
(c) Prepare a written justification for the confidentiality of each confidential item. Append this to the confidential copy.

Signature: _____ Date: 6/22/2005

Mail the completed application to: **Bay Area Air Quality Management District**
939 Ellis Street
San Francisco, CA 94109
Attention: Permit Services Division

The appropriate data form(s) should be completed for all equipment requiring a Permit to Operate. The data forms are listed below. If you are uncertain which data form to use, need additional data forms, or require assistance completing a form, please call the **Permit Services Division** at (415) 749-4990. Forms are also available on the District's website at www.baaqmd.gov/permit/forms.htm

Form A	Abatement Device	Form C	Combustion Equipment
Form D	Dry cleaner	Form F	Semiconductor Fabrication
Form G	Other Miscellaneous	Form SC	Solvent Cleaning Operation
Form S	Surface Coating	Form SS	Form S supplement for printers
Form **T**	Organic Liquid Loading/Storage	Form P	Emission Point
Form Diesel	Loss of Exemption Diesel Engines		

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

APPLICATION FOR CERTIFICATION FOR THE LOS ESTEROS CRITICAL ENERGY FACILITY, PHASE 2 (LOS ESTEROS 2)	**DOCKET NO. 03-AFC-2** **(Revised 6/17/05)** ***PROOF OF SERVICE***

I, Raquel Rodriguez, declare that on June 28, 2005, I deposited copies of the attached Petition To Amend Los Esteros Critical Energy Facility Conditions of Certification Application 01-AFC-12-and 03-AFC-2 in the United States mail at Sacramento, CA with first class postage thereon fully prepaid and addressed to the following:

DOCKET UNIT

Send the original signed document plus the required 12 copies to the address below:

CEC DOCKET UNIT
Attn: Docket No. 03-AFC-2
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512
docket@energy.state.ca.us

In addition to the documents sent to the Commission Docket Unit, also send individual copies of any documents to:

APPLICANT

Calpine
Rick Tetzloff, Project Manager
700 NE Multnomah, Suite 870
Portland, OR 97232

Steve De Young
Environmental Manager
4155 Arbolado Drive
Walnut Creek, CA 94598
steve4155@astound.net

COUNSEL FOR APPLICANT

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Greg L. Wheatland
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glw@eslawfirm.com

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Richard Buikema, Sr. Planner II
801 N. First Street, Room 400
San Jose, CA 95110
rich.buikema@ci.sj.ca.us

County of Santa Clara Planning Office
Bob Eastwood
County Government Center
70 West Hedding Street
East Wing, 7th Floor
San Jose, CA 95110-1705

Santa Clara Valley Water District
Luis Jaimes
5750 Almaden Expressway
San Jose, CA 95118-3686

California Air Resources Board (CARB)
Michael Tollstrup
Project Assessment Branch
P.O. Box 2815
Sacramento, CA 95812
mtollstr@arb.ca.gov

William DeBoisblanc, Director Permit Services
Bay Area Air Quality Mgmt. District
939 Ellis Street
San Francisco, CA 94109

Regional Water Quality Control Board (RWQCB)
Judy Huang
1515 Clay Street, Suite 1400
Oakland, CA 94612
jch@rb2.swrcb.ca.gov

City of San Jose
Environmental Services Department
Municipal Water System Division
3025 Tuers Road
San Jose, CA 95121

INTERESTED PARTICIPANTS

Cal-Independent System Operator
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151 Blue Ravine Road
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jmiller@caiso.com

Electricity Oversight Board
770 L St., Suite 1250
Sacramento, CA 95814

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ddavy@ch2m.com

INTERVENORS

*** CURE**
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Californians for Renewable Energy, Inc. (CARE)
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5439 Soquel Drive
Soquel, CA 95073
michaelboyd@sbcglobal.net

Californians for Renewable Energy, Inc. (CARE)
Robert Sarvey
501 W. Grantline Road
Tracy, CA. 95376
sarveybob@aol.com

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

Raquel Rodriguez
(Signature)

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FOR YOUR INFORMATION ONLY! Parties DO NOT mail to the following individuals. The Energy Commission Docket Unit will internally distribute documents filed in this case to the following:

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