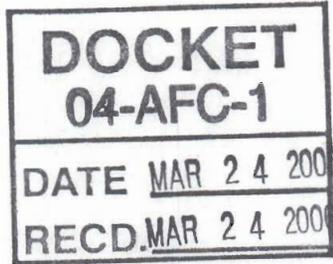




CH2MHILL



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March 24, 2006

Mr. William Pfanner
Siting Project Manager
California Energy Commission
1516 Ninth Street, MS-15
Sacramento, CA 95814-5504

RE: Final Staff Assessment Comments, Set 2
San Francisco Electric Reliability Project (04-AFC-01)

Dear Bill:

On behalf of the City of San Francisco, please find attached 12 copies and one original of the Final Staff Assessment (FSA) Comments, Set 2 in response to the FSA Workshop held on March 6, 2006.

Please call me if you have any questions.

Sincerely,

CH2M HILL

John L. Carrier, J.D.
Program Manager

c: Project File
Proof of Service List

San Francisco Electric Reliability Project (SFERP)
(04-AFC-1)
FSA Comments, Set 2

Listed below, for CEC staff's consideration, are Set 2 of City of San Francisco's comments on the Final Staff Assessment (FSA) for the San Francisco Electric Reliability Project (04-AFC-01).

SOIL AND WATER RESOURCES

2-1. At the FSA Workshop held on March 6, 2006, staff indicated that they would like an updated "Will Serve" letter for the water supply that indicates the diameter of the water line and the location of the point-of-interconnection. Such a letter is provided as Attachment S&W2-1.

2-2. At the FSA Workshop, staff also requested more information about the permitting of the recycled water line within the City of San Francisco. Our response is provided below: The use of recycled water in California is strictly regulated by federal, state, and local laws. The enforcement of these laws is monitored by state and local regulatory agencies. The Federal laws provide legislation for water recycling through the federal Water Pollution Control Act of 1972 (also referred to as the Clean Water Act) and its related amendments. However, primary responsibility for development of regulations on the treatment, distribution, and operation of recycled water is left to the State of California.

The following state laws govern the use of recycled water in California:

- Health and Safety Code (Division 104; Part 12)
- Water Code (Division 7; Chapters 2, 6 and 22)
- Title 22, California Code of Regulations (Division 4; Chapters 1,2 and 3)
- Title 17, California Code of Regulations (Division 1; Chapter 5)

The California Department of Health Services (DOHS) is the agency mandated with establishing recycled water quality standards for the state. The DOHS has developed one of the most comprehensive and strict set of standards in the world. These standards are developed in coordination with a team of trained experts in the fields of engineering, health, and disease control from various public and private organizations.

The recycled water laws are enforced by the DOHS and RWQCB. Before any recycled water project can be implemented in San Francisco, a water recycling permit will need to be issued by the San Francisco Bay Regional Water Quality Control Board (RWQCB). Obtaining such a permit from the RWQCB requires an approved California Environmental Quality Act (CEQA) document, an engineering report (reviewed and approved by the DOHS), and an officially adopted recycled water management organization frame work. The engineering report describes how the project complies with the laws related to recycled water. This engineering report is typically developed during the pre-design or design phase once sufficient technical information is available to demonstrate the compliance with the laws. The RWQCB has jurisdiction over the issuance of the project master reclamation permit covering the supply and distribution of recycled water. The project master permit will include:

1. the waste discharge requirements;

San Francisco Electric Reliability Project (SFERP)
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FSA Comments, Set 2

2. a requirement that the City comply with the uniform statewide reclamation criteria, and permit conditions for the use of recycled water not addressed by the uniform statewide water reclamation criteria;
3. a requirement that the City establish and enforce rules or regulations for reclaimed water users, governing the design and construction of reclaimed water use facilities and the use of reclaimed water;
4. a requirement for quarterly reporting;
5. inspection requirements; and
6. other additional requirements.

After the recycled water projects are implemented, the RWQCB will be the lead regulatory agency with respect to monitoring the City's compliance with the water recycling permit. The SFPUC will monitor the performance of its projects and send reporting documents to the RWQCB. The RWQCB would make site visits to observe operation of the system on an annual basis.

The City will work with the San Francisco County Health Department that maintains compliance with state regulations for cross connection controls for recycled water systems. All pipes installed above or below the ground that are designed to carry recycled water will be colored purple or wrapped with recycled water delineation purple tape.

In addition to the above, the City will work directly with DOHS who has jurisdiction over the statewide recycling criteria for each varying type of use of recycled water specific to the protection of public health. The City will prepare and submit an engineering report to both DOHS and the RWQCB pursuant to Title 22 of the California Code of Regulations that includes information about the treatment and plumbing design, cross-connection control, and monitoring plan. The City will address all DOHS general recycled water treatment and distribution requirements for the design, maintenance, and operations that are required as part of Title 22. The City will also address the DOHS recycled water requirements covered in Title 17 specific to cross connection and the prevention of hazards.



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**ELECTRONIC PROOF OF SERVICE LIST
Revised 2-17-06**

**SAN FRANCISCO ELECTRIC RELIABILITY PROJECT
APPLICATION FOR CERTIFICATION,
DOCKET NO. 04-AFC-1**

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I declare that I transmitted the foregoing document via e-mail, or as indicated by first class postal mail, to the above named on the date indicated thereby. I declare under penalty of perjury that the foregoing is true and correct.

Anar Bhimani
CH2M HILL