



COUNTY OF SAN BENITO
PLANNING & BUILDING INSPECTION SERVICES

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July 25, 2007

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DOCKET	
06-AFC-5	
DATE	JUL 25 2007
RECD.	AUG 13 2007

James W Reede, Jr., Ed.D
Siting Project Manager
1516 Ninth Street
Sacramento, CA 95814

Subject: Comments regarding Application for Certification for the proposed Panoche Energy Center

Dear Mr. Reede,

San Benito County is writing to express our possible concerns regarding the Application for Certification for the proposed Panoche Energy Center. Thank you for the opportunity to review and comment on this proposed project. Staff has reviewed the Draft Environmental Impact Report and had the following comments.

Project Background:

The project background contains information on the proposed Panoche Energy Center and the effects, if any, on the County of San Benito. The following sections are included: reason or need for the proposed project, location of the proposed site, description of the proposed facility, power generation distribution, proposed construction time frame, air quality concerns for San Benito County, and lastly, water quality concerns for San Benito County.

Reason or need for development:

"The Panoche site was chosen because of its proximity to the transmission system. The site has the ability to accommodate significant new generation without incurring substantial upgrade costs, and because there are existing generation plants adjacent to the site." "The goals and objectives of this project are to meet the contractual requirements of PG&E and satisfy the guarantees and requirements of equipment vendors."
The energy center is being developed as a "peaker" plant, or one that runs at times of peak electricity usage. An example of a time of peak usage would be a hot summer's day. As an immediate load and peaking facility, the plant will operate no more than 5000 hours per year.

Location of proposed construction of the Panoche Energy Center:

The proposed location of the Panoche Energy Center is 12 miles southwest of the city of Mendota and approximately 50 miles west of the city of Fresno. This is an unincorporated area of the county of Fresno, near the border of the Fresno/Madera county line. Mendota and Firebaugh are the nearest communities and are located 18 and 25 miles northeast of the project site, respectively. San Benito County borders the western portion of Fresno County.

PROOF OF SERVICE (REVISED 6/27/07) FILED WITH
ORIGINAL MAILED FROM SACRAMENTO ON 8/14/07

MS

Description of the facility:

The facility is a simple-cycle generating facility located on a 12.8-acre site. The proposed site is located on a 128-acre parcel (APN 027-060-78S). The facility will contain four natural gas-fired combustion tribune generators. Each combustion tribune generator will generate 100 MW net at summer design ambient conditions. Natural gas will be delivered to the site via a new 2,400-foot high-pressure lateral pipeline that will connect to a PG&E high-pressure gas trunk line located east of PG&E's electrical substation.

When in operation the generators will be the source of power generation for both the facility and the power grid system.

Construction time frame:

Construction is scheduled to begin in January 2008 and continue through August 2009.

Power distribution:

Energy generated will be transferred into the power grid system at the PG&E Panoche Substation. This substation is located approximately 300 feet from the proposed site.

Air quality concerns for San Benito County:

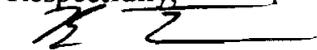
The proposed Panoche Energy Center falls within the San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD). San Benito County is under the jurisdiction of the Monterey Bay Unified Air Pollution Control District. Both the SJVUAPCD and the California Energy Commission conducted the air quality analysis for this project.

The monitoring station at Pinnacles National Monument-Bear Valley (CA66) is listed as a "Class I" air quality attainment. This station is located in southern San Benito County, west of the proposed project site. In their initial review of the Application for Certification, staff could not find any analysis of the potential for transport, which may affect air quality in San Benito County. The Application for Certification comments on meteorological conditions, including wind conditions, and the following information suggests transport could occur: "The winds during the winter show two predominating directions, from the northwest and from the southeast (i.e. up and down valley directions)." The Application for Certification should take into account the potential effects of this project on all bordering air basins, including the North Central Coast Air Basin, and effects on the Pinnacles National Monument-Bear Valley (CA66) station attainment status.

Water quality concerns for San Benito County:

Water will be needed for a variety of purposes in the facility. Some of the major uses include: the use in the cooling towers, plant service water, safety, and injection of NO_x into deep well systems. Process water and other non-potable water uses are proposed to be supplied to the facility from two new groundwater wells drilled onsite. San Benito has no comments on potential water quality impacts to the County at this time.

Respectfully,



Mr. Byron Turner; Principal Planner
San Benito County Building and Planning Department

Cc: Art Henriques; Director of Building and Planning
San Benito County Building and Planning Department

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

**APPLICATION FOR CERTIFICATION
FOR THE PANOCHÉ ENERGY
CENTER**

**Docket No. 06-AFC-5
PROOF OF SERVICE
(Revised 6/27/07)**

INSTRUCTIONS: All parties shall 1) send an original signed document plus 12 copies OR 2) mail one original signed copy AND e-mail the document to the web address below, AND 3) all parties shall also send a printed OR electronic copy of the documents that shall include a proof of service declaration to each of the individuals on the proof of service:

**CALIFORNIA ENERGY COMMISSION
Attn: Docket No. 06-AFC-5
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DECLARATION OF SERVICE

I, Maria Sergoyan, declare that on August 14, 2007, I deposited copies of the attached AFC Comments for the Panoche Energy Center Project (06-AFC-5), in the United States mail at Sacramento, CA with first-class postage thereon fully prepaid and addressed to those identified on the Proof of Service list above.

OR

Transmission via electronic mail was consistent with the requirements of California Code of Regulations, title 20, sections 1209, 1209.5, and 1210. All electronic copies were sent to all those identified on the Proof of Service list above.

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


Maria Sergoyan