CITY OF
CARLSBAD
Fire Department

www.carlsbadca.gov

January 12, 2011

DOCKET
07-AFC-6
DATE JAN 12 2011
RECD. JAN 12 2011

James D. Boyd, Presiding Member
Anthony Eggert, Associate Member
Carlsbad Siting Committee
California Energy Commission

Subject: Carlsbad Energy Center Project (07-AFC-6) - Additional Comments on Proposed CECP as a Result of a Power Plant Fire

Dear Commissioners Boyd and Eggert:

As chief of the Carlsbad Fire Department (CFD), I'd like to update the Committee regarding a recent transformer fire at the Palomar Energy Center in Escondido and share my views regarding the implications of a similar event at the proposed Carlsbad Energy Center Project (CECP). The CFD believes that the Palomar Energy Center fire illustrates problems inherent in the CECP design and location.

The Escondido Fire Department (EFD) will issue an after-action analysis of this incident, which CFD looks forward to studying and may result in additional comments that will be of benefit to the Committee in considering a license for the CECP.

EFD was informed of the fire at Palomar at about noon Wednesday, December 22, 2010. The fire broke out in a transformer in the north section of the plant adjacent to the switchyard. The fire was fueled by mineral oil leaking from the transformer.

Based on my conversation with Escondido Fire Chief Michael Lowry and my reading the EFD incident report (Attached), the transformer was engulfed in flames and emitting a pillar of smoke when EDF firefighters arrived and they faced a formidable task trying to extinguish the fire. The department called in firefighting, hazmat and rescue teams from the San Diego Fire Department and Marine Corps Base Camp Pendleton. Firefighters initially attempted to extinguish the fire by applying "class B" foam, but for various reasons this tactic initially failed and EFD decided to monitor and contain the event. When the oil burned down and cooled sufficiently, firefighters again applied foam and attained full extinguishment at about 2:20 p.m. on Thursday, December 23, 2010, more than 24 hours after it started.

During this emergency, EFD consulted with the County Air Pollution Control District and the County Department of Environmental Health, and it residents, businesses and others within roughly a one-mile radius of the plant were advised to "shelter in place,"

Office of the Fire Chief
2560 Orion Way, Carlsbad, CA 92010-7240 T 760-931-2141 F 760-929-0256

meaning they should remain indoors or avoid the area. This advisory alert remained in effect for about 24 hours. The fumes from the fire were determined not to be toxic. A decision was also made to close Citracado Parkway, a four-lane major road that serves Escondido.

In dealing with the Palomar fire, the EFD deployed six fire suppression vehicles, one ambulance and two command vehicles to the fire. It dedicated 23 emergency personnel, including four chiefs, to the incident. Other agencies also dispatched emergency equipment and personnel to the fire. The Escondido Police Department also responded.

The Palomar Energy Center and CECP are similar in design, but different in location. According to the Energy Commission's Final Decision approved in August 2003, the Palomar facility is a 550-megawatt natural-gas-fired combined cycle power plant located on a 20-acre site within a 186-acre industrial park removed from major transportation arteries. Interstate 15 is about a mile east of the plant, and State Route 78 about a mile north. The Palomar site is located on the side of a hill and is bordered on the west by a steep slope. The power plant is situated on the south part of the site and the switchyard is on the north. Citracado Parkway is about 450 feet away on the plant's western boundary.

The CECP will be a 558-megawatt natural-gas-fired combined-cycle generating facility on approximately 23 acres and located entirely within a 30-foot deep pit. As I understand it, some of the CECP's transformers are located within the pit. Perimeter access roads within the pit would be as narrow as 25 feet. The CECP lies within 100 feet of two major transportation arteries — Interstate 5 and the rail line connecting San Diego to Los Angeles.

The fire at the Palomar plant accentuates the fire-suppression and management problems at CECP that CFD has cited previously.

In the event of a transformer fire, or any unpredictable emergency at CECP, the plant's narrow roads would present challenges for CFD to respond with the same level of force, because of limited access to and within the plant's grounds. Emergency vehicles would have difficulty passing other vehicles and retreating to safety if the fire were to escalate and force them back. CFD would possibly have to close Carlsbad Boulevard and/or Cannon Road to address the emergency, further exacerbating traffic problems.

The CECP plant's configuration also eliminates part of the "rim road" that would circle the plant above this pit. The remaining rim road, as currently designed, is too narrow to accommodate the city's emergency apparatus and circulates the plant on only three sides, limiting options available to CFD in attacking a similar emergency at CECP.

If required, a 24-hour shelter-in-place advisory for a one-mile radius around the CECP site would affect a significant portion of northern Carlsbad, including several schools. A fire at the CECP could also result in closure of Interstate 5 and the railroad. Closure of Interstate 5 would like result in diversion of some traffic onto local streets compounding emergency response efforts.

It is regrettable that a fire occurred at Palomar, and the CFD is thankful there were no major injuries or loss of life. I would like to stress, however, that a fire at the CECP similar to that experienced in Escondido would pose major safety concerns to workers, emergency response personnel, and the public. For this reason I want to re-iterate the Carlsbad Fire Department's requirement that the lower perimeter road be 50 feet wide or more and that the upper rim road be complete around the facility and that it is 25 feet wide or more. (Authority California Fire Code 503.2.1) It is our sincere wish that the committee give serious consideration to the safety concerns that CFD raised in the past, and which are articulated in the evidentiary record. It is CFD's opinion that the Palomar incident validates these concerns.

If you have any questions, please don't hesitate to call me at (760) 931-2141.

Sincerely,

Kevin Crawford
Carlsbad Fire Chief

Escondido Fire Department

A

FDID	State	Incident Date	Station	Incident Number	Exposure
37070	CA	12/22/2010	01	0011083	000

☐ Delete
☐ Change
☐ No Activity

NFIRS-1 Basic

B Location

☑ Street Address
☐ Intersection
☐ In front of
☐ Rear of
☐ Adjacent to
☐ Directions
☐ US National Grid

☐ Address on Wildland Form

Census Tract

Number	Prefix	Street	Type	Suffix
2300		HARVESON	PL	

Apt/Suite	City	State	Zip Code
	Escondido	CA	92029

Cross Street, Directions or US National Grid, as applicable

C Incident Type

100 Fire, other

D Aid Given or Received

1 ☑ Received
2 ☐ Automatic Rec'vd
3 ☐ Given
4 ☐ Automatic Given
5 ☐ Other Aid Given
N ☐ None

Their FDID

Their State

0000000
Their Incident

E1 Dates & Times

		Mon. Day Year	Time
Alarm		12/22/10	12:11
Arrival	☑ Arrival	12/22/10	12:13
Control	☑ Control	12/23/10	14:20
Last Unit Clear	☑ Last Unit Clear	12/23/10	16:00

E2 Shifts / Alarms

Shift	Alarms	Dist.
-C	0	06

E3 Special Studies

ID#	Value

F Actions Taken

81 Incident command

Primary Action Taken (1)

11 Extinguish

Additional Action Taken (2)

Additional Action Taken (3)

G1 Resources

	Apparatus	Personnel
Suppression	6	18
EMS	1	2
Other	2	3

☐ Check if counts include mutual aid resources

G2 Dollar Loss & Values

LOSSES:		NONE
Property	3000000	☐
Contents	0	☑

PRE-INCIDENT VALUE		
Property	3000000	☐
Contents	0	☑

Completed Modules

☑ Fire-2
☐ Structure-3
☐ Civ. Casualty-4
☑ Fire Casualty-5
☐ EMS-6
☐ Hazmat-7
☐ Wildland-8
☐ Apparatus-9
☐ Personnel-10
☐ Arson-11

H1 Casualties

☐ None

	Deaths	Inj.
Fire Service	0	1
Civilian	0	0

H2 Detector Alerted Occupants

1 ☐ Yes
2 ☑ No
U ☐ Unknown

H3 Hazmat Release

N ☑ None
1 ☐ Natural Gas
2 ☐ Propane Gas
3 ☐ Gasoline
4 ☐ Kerosene
5 ☐ Diesel Fuel/Fuel Oil
6 ☐ Household Solvents
7 ☐ Motor Oil
8 ☐ Paint
0 ☐ Other

I Mixed Use Property

NN ☐ Not Mixed
10 ☐ Assembly Use
20 ☐ Education Use
33 ☐ Medical Use
40 ☐ Residential Use
51 ☐ Row of Stores
53 ☐ Enclosed Mall
58 ☐ Business & Resid.
59 ☐ Office Use
60 ☑ Industrial Use
63 ☐ Military Use
65 ☐ Farm Use
00 ☐ Other Mixed Use

1st Company to Arrive
1304

J Property Use

615
Electric generating plant

Escondido Fire Department | 12/22/2010 | 0011083 | 0

K1 Person / Entity Involved

Business name (if applicable) | Phone

Prefix | First Name | MI | Last Name | Suffix

Check if same address as incident

Number | Prefix | Street or Highway | Street Type | Suffix

Post Office Box | Apt./Suite/Room | City

State | Zip

K2 Owner

Same as Person Involved

Business name (if applicable) | Phone

Prefix | First Name | MI | Last Name | Suffix

Check if same address as incident

Number | Prefix | Street or Highway | Street Type | Suffix

Post Office Box | Apt./Suite/Room | City

State | Zip

L Remarks

Comments for this incident have been printed on an additional comments page.

M Authorization

JVT	X JOHN TENGER	Battalion	Suppressio	12/23/2010
Officer in charge ID		Position or Rank	Assignment	Date
HG1	X HERB GRIFFIN	Battalion	Suppressio	12/23/2010
Member Making Report		Position or Rank	Assignment	Date

Escondido Fire Department

A

FDID	State	Incident Date	Station	Incident Number	Exposure
37070	CA	12/22/2010	01	0011083	000

☐ Delete
☐ Change
☐ No Activity

NFIRS-2 Fire

B Property Details

B1 0 — No. of residential units in building of origin — ☑ Not Residential

B2 1 — No. of buildings involved — ☐ Bldgs not involved

B3 0 — Acres burned (outside fire) — ☑ None ☐ Less than one acre

C On -Site Materials or Products ☐ None

515 — Heavy oils, grease, non-cooking relat
On-site materials (1)
1 ☐ Bulk storage or warehousing
2 ☐ Processing or manufacturing
3 ☐ Packaged goods for sale
4 ☑ Repair or Service

On-site materials (2)
1 ☐ Bulk storage or warehousing
2 ☐ Processing or manufacturing
3 ☐ Packaged goods for sale
4 ☐ Repair or Service

On-site materials (3)
1 ☐ Bulk storage or warehousing
2 ☐ Processing or manufacturing
3 ☐ Packaged goods for sale
4 ☐ Repair or Service

D Ignition

D1 UU — Area of origin — Undetermined

D2 UU — Heat Source — Undetermined

D3 UU — Item first ignited — Undetermined

D4 UU — Type of material first ignited — Undetermined

☐ Confined to item

E1 Cause of Ignition ☐ Exposure Report

1 ☐ Intentional
2 ☐ Unintentional
3 ☐ Failure of equipment
4 ☐ Act of nature
5 ☑ Cause under investigation
U ☐ Undetermined after invest.

E2 Factors Contributing ☐ None

UU — Undetermined
Factor contributing to ignition (1)
Factor contributing to ignition (2)

E3 Human Factors Contributing to Ignition

1 ☐ Asleep ☑ None
2 ☐ Possibly impaired by alcohol or drugs
3 ☐ Unattended person
4 ☐ Mentally disabled
5 ☐ Physically disabled
6 ☐ Multiple persons
7 ☐ Age was a Factor

Estimated age
1 ☐ Male 2 ☐ Female

F1 Equipment Involved in Ignition ☐ None

221 — Transformer, distribution type
Equipment involved

Brand: Unknown
Model:
Serial #:
Year:

F2 Equipment Power

11 — Electrical line voltage (>=50 vo
Equipment Power Source

F3 Equipment Portability

1 ☐ Portable
2 ☑ Stationary

Portable equipment normally can be moved by one person, is designated to be used in multiple locations.

G Fire Suppression Factors ☐ None

313 — Significant/unusual fuel load from co
Fire suppression factor (1)
Fire suppression factor (2)
Fire suppression factor (3)

H1 Mobile Property Involved ☑ None

1 ☐ Not involved in ign, burned
2 ☐ Involved in ign, did not burn
3 ☐ Involved in ignition and burned

H2 Mobile Property Type & Make

Mobile property type
Mobile property make
Mobile property model
Year
License Plate Number
State
VIN Number

Local Use

☐ Pre-Fire Plan Available

Some of the nformation presented in this report may be based upon reports from other agencies:

☐ Arson report attached
☐ Police report attached
☐ Coroner report attached
☐ Other reports attached

FDID	State	Incident Date	Station	Incident Number	Exposure	Delete / Change	NFIRS Comments
37070	CA	12/22/2010	01	0011083	000		

BC1304, E1311, E1313, E1315, T1371 and M1396 were dispatched to a commercial fire at 571 Enterprise St. on 12/22/2010 at 1211 hours. Correct address (2300 Harveson Place). While en route I advised dispatched that we had smoke and fire showing from a distance. I also advised all incoming units that we would be taking a very cautious and methodical approach as this was involving the SDG&E power plant. I arrived on scene first and found a 30X30 area with a "Step Up Transformer" well involved with fire. I established Citracado IC and had all incoming units stage out on Citracado Pky. I met with SDG&E officials and request several documents concerning the contents being burned. At this point I began making additional notifications. I request SDFD Haz Mat, County Health and an EDP supervisor to the ICP that was established on Citracado Pky. After gathering further intel I determined that we would not be engaging in an offensive mode until further information and resources were available. Division Chief Montgomery arrived on scene and began to assist. I met with EPDs PIO and requested a reverse 911 set up, and deployed to the surrounding area informing residents to shelter in place after approval from APCD, who were on scene. Resources began to arrive. SDFD Haz Mat 1 with SDFD BC D. Williams and Camp Pendleton Haz Mat 1. At 1535 a meeting was held inside the command center with SDFD Haz Mat 1, CPFD Haz Mat 1, County Health, EFD Fire Chief Lowry, EFD Division Chief Montgomery who was assigned to Operations and myself BC Tenger Citracado IC. After the meeting an additional request was made to have the USMC Camp Pendleton AARF respond in to assist. When the USMC AARF unit arrived on scene we went to the control room and showed all the resources involved what the fire looked like on camera. After that meeting units responded back to the ICP to develop a plan to perform an offensive maneuver for putting the fire out. E1313 and one of the T1371 fire fighters were dispatched to the ICP. A plan was developed with a Hazmat Group, Suppression Group,Protection Group, Medical Group and Safety Officer. The tactic was to safely apply class "B" foam to extinguish the fire. After a safety briefing the plan was executed however, we were unable to extinguish the fire. Units were pulled out of the area and the decision was made to allow the transformer to burn. E1313 and M1396 were released from the scene. E1311, USMC AARF and BC1304 remained on scene and monitored the fire over night. The fire began to lessen in intensity over the night however, the wind began to change so I requested an additional reverse 911 sent out to the Harmony Grove area. Do to the wind change I contacted North Comm and advised them of the situation. I also, requested a Chief Officer from SMC to respond to the ICP for the morning briefing. At 0740 Battalion Chief Griffin arrived at the command post and was briefed on the incident. At 0810 Chief Griffin assumed "Citracado IC".
John V. Tenger
Battalion Chief
12-23-1010 Chief Griffin relieved Chief Tenger and assumed Citracado Command. We completed a turnover briefing at the command post and I then visited the incident site.
I returned to the command post and advised 1311 (safety) to keep everyone out of the secondary exclusion zone that we had set up around the transformer that was burning. We conducted a briefing at 1100 hours where we shared information and decided to evaluate the ability to attempt to extinguish the fire. After securing better berms around the secondary containment area, we requested an engine and ambulance to assist with the extinguishment. 1313 and 1392 arrived and we have an operational and safety briefing. We began extinguishment operations at 1400 hours and had full knockdown at 1420 hours.

At 1515 we released the Command Van, began pickup of hoses and equipment. 1311 advised there was a medical issue with a crew member. 1392 assessed and transported to PMC.

FDID	State	Incident Date	Station	Incident Number	Exposure		
37070	CA	12/22/2010	01	0011083	000	☐ Delete ☐ Change	NFIRS Comments

The scene was turned back over to the company at 1550 hours and command was terminated.
All units were released at 1600 hours.

A	FDID	State	Incident Date	Station	Incident Number	Exposure		
	37070	CA	12/22/2010	06	0011083	000	☐ Delete ☐ Change	NFIRS-9 Apparatus

B Apparatus or Resource		Dates and Times			Number of People	Use On Scene	Actions Taken	
Apparatus ID	1396	Dispatch	☑	12/22/2010 12:11	2	☐ Suppression	92	
Apparatus Type	76	Arrival	☑	12/22/2010 12:23		☑ EMS		
		Clear	☑	12/23/2010 21:31		☐ Other		

Personnel ID	Name and Rank	Off-Duty	Action Taken	Action Taken	Action Taken	Action Taken
JOC	COLLINS, J. PM	☐	92			
GJM	MARTINEZ, G. PM	☐	92			

A	FDID	State	Incident Date	Station	Incident Number	Exposure	Delete / Change	NFIRS-9 Apparatus
	37070	CA	12/22/2010	AD	0011083	000	☐ Delete ☐ Change	

B Apparatus or Resource		Dates and Times			Number of People	Use On Scene	Actions Taken	
Apparatus ID	1304	Dispatch	☑	12/22/2010 12:11	2	☐ Suppression	81	
Apparatus Type	00	Arrival	☑	12/22/2010 12:13		☐ EMS		
		Clear	☑	12/23/2010 16:00		☑ Other		

Personnel ID	Name and Rank	Off-Duty	Action Taken	Action Taken	Action Taken	Action Taken
HG1	GRIFFIN, H. BC	☐	81			
JVT	TENGER, J. BC	☐	81			

A	FDID	State	Incident Date	Station	Incident Number	Exposure		
	37070	CA	12/22/2010	01	0011083	000	☐ Delete ☐ Change	NFIRS-9 Apparatus

B Apparatus or Resource		Dates and Times			Number of People	Use On Scene	Actions Taken	
Apparatus ID	1371	Dispatch	☑	12/22/2010 12:11	4	☑ Suppression	92	
Apparatus Type	12	Arrival	☑	12/22/2010 12:18		☐ EMS		
		Clear	☑	12/22/2010 14:08		☐ Other		

Personnel ID	Name and Rank	Off-Duty	Action Taken	Action Taken	Action Taken	Action Taken
KMB	BEVERLY, K. EN	☐	92			
DEB	BOYER, D. CP	☐	92			
JBM	MATTHEWS, J. PM	☐	92			
DSR	REVERE, D. PM	☐	92			

A	FDID	State	Incident Date	Station	Incident Number	Exposure		
	37070	CA	12/22/2010	01	0011083	000	☐ Delete ☐ Change	NFIRS-9 Apparatus

B Apparatus or Resource		Dates and Times			Number of People	Use On Scene	Actions Taken	
Apparatus ID	1311	Dispatch	☐	12/22/2010 12:11	6	☑ Suppression	10	11
Apparatus Type	11	Arrival	☑	12/22/2010 12:18		☐ EMS	92	
		Clear	☑	12/23/2010 16:21		☐ Other		

Personnel ID	Name and Rank	Off-Duty	Action Taken	Action Taken	Action Taken	Action Taken
WJA	ATKINS, W. CP	☐	10	11	92	
JA1	AUBELE III, J. EN	☐	10	11	92	
TJD	Dowell, T. PM	☐	10	11	92	
JJF	FRYDAY, J. CP	☐	10	11	92	
TJJ	JOHNSON, T. PM	☐	10	11	92	
JTW	WILLIAMS, J. EN	☐	10	11	92	

A	FDID	State	Incident Date	Station	Incident Number	Exposure		
	37070	CA	12/22/2010	03	0011083	000	☐ Delete ☐ Change	NFIRS-9 Apparatus

B Apparatus or Resource		Dates and Times			Number of People	Use On Scene	Actions Taken	
Apparatus ID	1313	Dispatch	☑	12/22/2010 12:11	3	☑ Suppression	50	
Apparatus Type	11	Arrival	☑	12/22/2010 12:20		☐ EMS		
		Clear	☑	12/22/2010 12:34		☐ Other		

Personnel ID	Name and Rank	Off-Duty	Action Taken	Action Taken	Action Taken	Action Taken
DJA	ABRAHAM, D. EN	☐	93			
RHH	HUMES, R. PM	☐	93			
RLS	STUKA, R. CP	☐	93			

A	FDID	State	Incident Date	Station	Incident Number	Exposure		
	37070	CA	12/22/2010	05	0011083	000	☐ Delete ☐ Change	NFIRS-9 Apparatus

B Apparatus or Resource		Dates and Times			Number of People	Use On Scene	Actions Taken	
Apparatus ID	1315	Dispatch	☑	12/22/2010 12:11	3	☑ Suppression	92	
Apparatus Type	11	Arrival	☑	12/22/2010 12:21		☐ EMS		
		Clear	☑	12/22/2010 12:40		☐ Other		

Personnel ID	Name and Rank	Off-Duty	Action Taken	Action Taken	Action Taken	Action Taken
BRB	BIHUN, B. PM	☐	92			
JLR	RATLIFF, J. EN	☐	92			
PVW	WILLIAMS, P. CP	☐	92			

A	FDID	State	Incident Date	Station	Incident Number	Exposure		
	37070	CA	12/22/2010	AD	0011083	000	☐ Delete ☐ Change	NFIRS-9 Apparatus

B Apparatus or Resource		Dates and Times			Number of People	Use On Scene	Actions Taken	
Apparatus ID	1303	Dispatch	☑	12/22/2010 12:17	1	☐ Suppression	81	44
Apparatus Type	00	Arrival	☑	12/22/2010 12:27		☐ EMS	41	82
		Clear	☑	12/23/2010 16:14		☑ Other		

Personnel ID	Name and Rank	Off-Duty	Action Taken	Action Taken	Action Taken	Action Taken
PCM	MONTGOMERY, P. DC	☐	81	44	41	82

A							
37070	CA	12/22/2010	02	0011083	000	☐ Delete ☐ Change	**NFIRS-9 Apparatus**
FDID	State	Incident Date	Station	Incident Number	Exposure		

B Apparatus or Resource		Dates and Times			Number of People	Use On Scene	Actions Taken	
Apparatus ID	1392	Dispatch	☐	12/23/2010	13:10	2	☐ Suppression	30	33
Apparatus Type	76	Arrival	☐	12/23/2010	13:29		☑ EMS	34	
		Clear	☐	12/23/2010	16:23		☐ Other		

Personnel ID	Name and Rank	Off-Duty	Action Taken	Action Taken	Action Taken	Action Taken
GLM	McCLELLAN, G. PM	☐	30	33	34	
TAS	STUART, T. PM	☐	30	33	34	

A							
37070	CA	12/22/2010	AD	0011083	000	☐ Delete ☐ Change	**NFIRS-9 Apparatus**
FDID	State	Incident Date	Station	Incident Number	Exposure		

B Apparatus or Resource		Dates and Times			Number of People	Use On Scene	Actions Taken	
Apparatus ID	1301	Dispatch	☑	12/22/2010	15:00	1	☑ Suppression	81	
Apparatus Type	00	Arrival	☑	12/22/2010	15:00		☐ EMS		
		Clear	☑	12/23/2010	16:00		☐ Other		

Personnel ID	Name and Rank	Off-Duty	Action Taken	Action Taken	Action Taken	Action Taken
MJL	LOWRY, M. CH	☐	81			

BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT COMMISSION OF THE STATE OF CALIFORNIA
1516 NINTH STREET, SACRAMENTO, CA 95814
1-800-822-6228 – WWW.ENERGY.CA.GOV

APPLICATION FOR CERTIFICATION FOR THE *CARLSBAD ENERGY CENTER PROJECT*

Docket No. 07-AFC-6
PROOF OF SERVICE
(Revised 11/3/2010)

APPLICANT

***David Lloyd**
George Piantka, PE.
NRG Energy, Inc.- West Region
5790 Fleet Street, Ste. 200
Carlsbad, CA 92008
david.lloyd@nrgenergy.com
george.piantka@nrgenergy.com

APPLICANT'S CONSULTANTS

Robert Mason, Project Manager
CH2M Hill, Inc.
6 Hutton Centre Drive, Ste. 700
Santa Ana, CA 92707
Robert.Mason@ch2m.com

Megan Sebra
CH2M Hill, Inc.
2485 Natomas Park Drive, Ste. 600
Sacramento, CA 95833
Megan.Sebra@ch2m.com

COUNSEL FOR APPLICANT

John A. McKinsey
Stoel Rives LLP
500 Capitol Mall, Suite 1600
Sacramento, CA 95814
jamckinsey@stoel.com

INTERESTED AGENCIES

California ISO
E-mail Preferred
e-recipient@caiso.com

INTERVENORS

Terramar Association
Kerry Siekmann & Catherine Miller
5239 El Arbol
Carlsbad, CA 92008
siekmann1@att.net

City of Carlsbad
South Carlsbad Coastal
Redevelopment Agency
Allan J. Thompson
21 "C" Orinda Way #314
Orinda, CA 94563
allanori@comcast.net

City of Carlsbad
South Carlsbad Coastal
Redevelopment Agency
Joseph Garuba,
Municipals Project Manager
Ronald R. Ball, Esq., City Attorney
1200 Carlsbad Village Drive
Carlsbad, CA 92008
E-mail preferred
Joe.Garuba@carlsbadca.gov
ron.ball@carlsbadca.gov

California Unions for Reliable Energy
("CURE")
Marc D. Joseph
Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080
gsmith@adamsbroadwell.com
mdjoseph@adamsbroadwell.com

Center for Biological Diversity
c/o William B. Rostov
EARTHJUSTICE
426 17th St., 5th Floor
Oakland, CA 94612
wrostov@earthjustice.org

Power of Vision
Julie Baker & Arnold Roe, Ph.D.
4213 Sunnyhill Drive
Carlsbad, California 92013
powerofvision@roadrunner.com

Rob Simpson
Environmental Consultant
27126 Grandview Avenue
Hayward, CA 94542
rob@redwoodrob.com

ENERGY COMMISSION

JAMES D. BOYD
Vice Chair and Presiding Member
jboyd@energy.state.ca.us

ANTHONY EGGERT
Commissioner and Associate Member
aeggert@energy.state.ca.us

Paul Kramer
Hearing Officer
pkramer@energy.state.ca.us

Mike Monasmith
Siting Project Manager
mmonasmi@energy.state.ca.us

Dick Ratliff
Staff Counsel
dratliff@energy.state.ca.us

Lorraine White
Adviser to Commissioner Eggert
lwhite@energy.state.ca.us

Jennifer Jennings
Public Adviser's Office
E-mail Preferred
publicadviser@energy.state.ca.us

*indicates change

DECLARATION OF SERVICE

I, Robin Noschy declare that on January 14, 2011, I served and filed copies of the attached letter from Carlsbad Fire Chief. The original document, filed with the Docket Unit, is accompanied by a copy of the most recent Proof of Service list, located on the web page for this project at: [http://www.energy.ca.gov/sitingcases/carlsbad/index.html]. The document has been sent to both the other parties in this proceeding (as shown on the Proof of Service list) and to the Commission's Docket Unit, in the following manner:

(Check all that Apply)

For service to all other parties:

X sent electronically to all email addresses on the Proof of Service list;

____ by personal delivery;

____ by delivering on this date, for mailing with the United States Postal Service with first-class postage thereon fully prepaid, to the name and address of the person served, for mailing that same day in the ordinary course of business; that the envelope was sealed and placed for collection and mailing on that date to those addresses **NOT** marked "email preferred."

AND

For filing with the Energy Commission:

X sending an original paper copy and one electronic copy, mailed and emailed respectively, to the address below (preferred method);

OR

____ depositing in the mail an original and 12 paper copies, as follows:

CALIFORNIA ENERGY COMMISSION
Attn: Docket No. 07-AFC-6
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512
docket@energy.state.ca.us

I declare under penalty of perjury that the foregoing is true and correct, that I am employed in the county where this mailing occurred, and that I am over the age of 18 years and not a party to the proceeding.

Robin Noschy

*indicates change