

# Power of Vision

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Hearing Officer Paul Kramer  
California Energy Commission  
1516 Ninth Street  
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<b>DOCKET</b>
<b>07-AFC-6</b>
DATE <u>May 17 2011</u>
RECD. <u>May 17 2011</u>

Re: Docket No. 07-AFC-6

Dear Mr. Kramer:

Power of Vision would like to add the following document into evidence under the “lessons learned from the Kleen Energy & Palomar power plant fires.

Sincerely,

Julie Baker  
Arnold Roe, PhD

Attachments



## National Fuel Gas Code to Consider Chemical Safety Board Recommendation

### National Fuel Gas Code to Consider Chemical Safety Board Recommendation

The U.S. Chemical Safety Board (CSB) investigated two explosions in the past year in an industrial plant in North Carolina and a nearly completed power plant in Connecticut. In both cases, the venting of natural gas through the piping system and into the atmosphere led to ignition and subsequent fatalities. The CSB issued urgent safety recommendations to NFPA and other parties.

Subsequently, the National Fuel Gas Code Committee issued a Tentative Interim Amendment (TIA 54-09-3) that addresses the purging of air and fuel gas from gas piping systems. However, the process of using natural gas to clean the piping system, which led to the explosion at the power plant, does not fall within the scope of the National Fuel Gas Code because fuel gas piping in electric utility power plants is not within the scope of the code (Section 1.1.1.2 [10]).

Therefore, the NFPA Standards Council proposed two options for consideration. The first option is to revise the scope of the National Fuel Gas Code Technical Committee to permit it to address power plant piping systems, which would then permit the consideration of revisions to the code to address pipe cleaning operations using fuel gas. In addressing this option, the Standards Council must decide whether the National Fuel Gas Code is the most appropriate location to address these types of operations; whether the members of the committee have the necessary expertise to do so; and, whether the committee members themselves believe that it should undertake that activity.

The second option being considered is to have the Standards Council appoint a separate technical committee that would develop a standard dedicated to addressing the safe practices associated with an array of gas process activities, including the "cleaning of gas piping, enriching the concentration within gas piping during commissioning (charging the line), and discharge of gas already in the system during gas purging or maintenance."

The Standards Council voted to publish a notice seeking input from the National Fuel Gas Code Committee and the general public by September 17 on how to proceed. The input received will be reviewed by the Council at its October 2010 meeting. To provide input, please go to [www.nfpa.org](http://www.nfpa.org) and look under "Codes and Standards."

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BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT  
COMMISSION OF THE STATE OF CALIFORNIA  
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APPLICATION FOR CERTIFICATION  
FOR THE **CARLSBAD ENERGY  
CENTER PROJECT**

**Docket No. 07-AFC-6  
PROOF OF SERVICE**  
(Revised 1/24/2011)

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**DECLARATION OF SERVICE**

I, Julie Baker, declare that on May 17, 2011, I served and filed copies of the attached Power of Vision May 19 Evidentiary hearing document. 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)**

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

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**AND**

**For filing with the Energy Commission:**

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  
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[docket@energy.state.ca.us](mailto: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.

\_\_\_\_\_  
Julie Baker