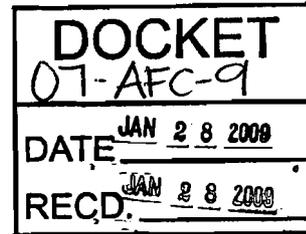


January 28, 2009

Ms. Angela Hockaday
California Energy Commission
Docket Unit
1516 Ninth Street
Sacramento, CA 95814-5512



Subject:

**APPLICATION FOR THE CANYON POWER PLANT
DOCKET NO. 07-AFC-09**

Dear Ms. Hockaday:

Enclosed for filing with the California Energy Commission are one (1) original and twelve (12) copies of the following documents, for the Canyon Power Plant Docket No.07-AFC-09:

1. ECM Technology White Paper
2. Letter dated December 16, 2008 to SCAQMD
Subject: Changes to the Canyon Power Plant Annual Emissions and Dispersion Modeling
3. Letter dated on January 6, 2009 to SCAQMD
Subject: Change in the Fuel Use and Sox/PM10 Emission Factors Used During Commissioning for the Canyon Power Plant (Facility I.D. 153992)
4. Letter dated on January 23, 2009 to California Energy Commission
5. Letter dated on July 2, 2008
Subject: May 8, 2008 Letter Regarding the AFC for Canyon Power Plant Project in Anaheim, CA.

Sincerely,



Scott Galati
Counsel to Canyon Power Plant



City of Anaheim
PUBLIC UTILITIES DEPARTMENT
Integrated Resources Division

January 23, 2009

Eric K. Solorio, Project Manager
California Energy Commission
Siting, Transmission and Environmental Protection Division
1516 Ninth Street, MS-15
Sacramento, CA 95814
(916) 651-0966

Dear Mr. Solorio;

In our introductory telephone conversation we had with you late last week, you pointed out that in its formal proceeding for the Canyon Power Project, the Commission asked for information regarding the status of Anaheim's Renewable Portfolio Standard (RPS) and how Anaheim incorporates energy conservation efforts into its load forecasting. This letter is a response to those inquiries.

With respect to its RPS, in 2002, Anaheim City Council adopted the initial policy of having 15% of its retail customer's energy requirements met with renewable energy resources by 2017. In the summer of 2006, the Council revised its policy to require an RPS of 20% by 2015.

At this time, Anaheim has several long-term purchasing agreements in place and receiving energy from a variety of renewable energy sources, including 36 MW from wind powered resources, 5 MW generated from landfill gas, 9 MW of small hydro, and 18 MW from geothermal resources. With this resource mix, Anaheim anticipates that at the end of fiscal year 2009 (this June) its RPS will have reached 9.7%.

In addition, Anaheim has executed contracts for an additional 11 MW of geothermal energy and an additional 20 MW of landfill gas, both of which are expected to be in commercial operation by the end of 2010. Those projects would add another 9% to Anaheim's RPS target. Anaheim is also in the process of negotiating contracts for an additional 38 MW of geothermal, expected to be in commercial operation by 2012. If these contracts are successfully executed and become operational as planned, by the end of fiscal year 2013, Anaheim's RPS will have reached 28%. This would exceed Anaheim's current goal and put the target ahead of schedule by two years.

As for energy conservation, on an annual basis, Anaheim measures the energy savings from its energy efficiency and demand response programs. Anaheim calls the total energy efficiency and demand response services, funded by public benefits dollars, "Advantage Services." The "Advantage Services," Annual Report provides residents of Anaheim with the programs Anaheim offers, the expenditures of the programs and associated energy savings.

201 S. Anaheim Boulevard, Suite 802
Anaheim, California 92805

TEL (714) 765-4250
FAX (714) 765-4140

Total savings for fiscal year ending June 2007 realized a total of 3.153 MW peak demand reduction as a result of energy efficiency and demand response programs. A total energy savings of 8,241 MWh (or 8.2 GWh) were realized as a result of energy efficiency and demand response programs. Our peak for this period was 593 MW in July 2006. Our total energy as measured at Lewis substation was 2,687 GWh. If these programs were not in place, the resulting load for fiscal year 2007 would have been 2,695.2 with a peak load of 596 MW.

In forecasting customer energy requirements, Anaheim has a two-step process that overlays project or customer spot demands of 1 MW or larger over energy forecasts determined through econometric modeling. Large specific projects such as a new hospital or hotel in the Resort Area or specific housing development are determined separately from the base load forecast which relies on conventional econometric models based on historic information. Impact of conservation and energy efficiency programs are not determined separately and then overlaid in the forecast; rather, they are embedded in the data used to determine the base load energy forecast.

Anaheim uses historic energy usage by customer class in its forecast for future energy consumption. The historic energy usage reflects all energy efficiency programs that were implemented over the course of the last 10 years. This data is used to develop econometric equations that define the customer class usage as a function of several components. The historic usage data includes the cumulative impacts of all Anaheim's conservation programs, energy efficiency products (LED lights, CFL light bulb installation), and energy efficiency programs. Anaheim's energy load growth is thereby impacted by the DSM programs the City provides, specifically conservation and energy efficiency programs. The past actual energy demand mega-watt hours are mitigated by a negative energy demand as a result of these programs.

Attached is a graph that depicts the impact of the energy conservation programs relative to the actual forecast used for determining future supply-side requirements. The graph depicts the energy requirements that would have existed and been forecast had there been no energy efficiency/conservation programs relative to actual usage and the forecast of usage with those programs included in the forecast.

I hope this addresses the questions brought up in the hearings. If there is additional information required, don't hesitate to contact me.

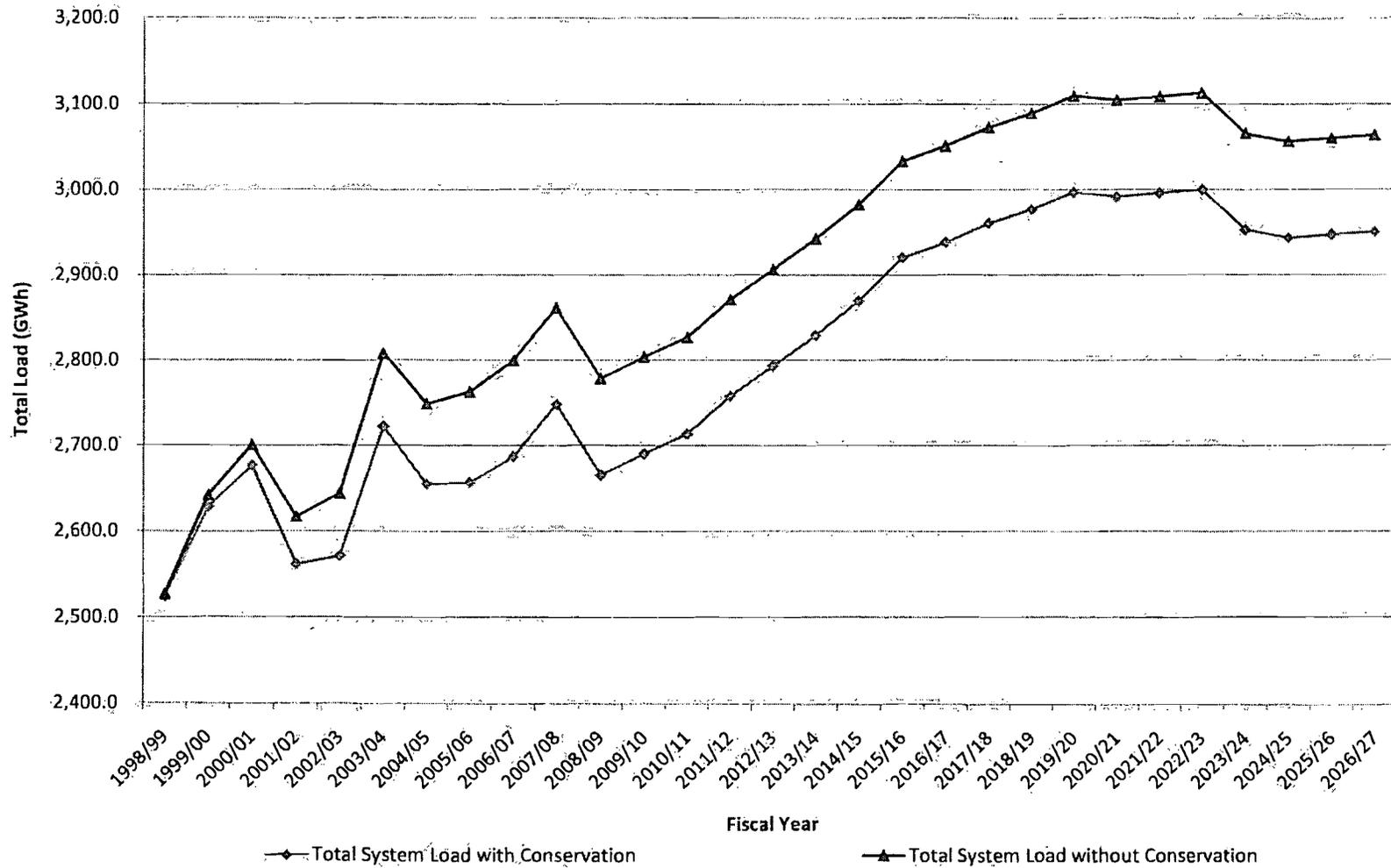
Sincerely,



Steve Sciortino
Integrated Resources Manager
(714) 765-5177

Attachment:

Total Load (with and without Energy Conservation) Actual Load FY 1999 - FY 2008, Projected Load FY 2009 - FY 2028





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 *CANYON POWER PLANT*
PROJECT

Docket No. 07-AFC-9

PROOF OF SERVICE
(REVISED 7/31/2008)

INSTRUCTIONS: All parties shall either (1) send an original signed document plus 12 copies or (2) mail one original signed copy AND e-mail the document to the address for the Docket as shown below, AND (3) all parties shall also send a printed or electronic copy of the document, which includes a proof of service declaration to each of the individuals on the proof of service list shown below:

CALIFORNIA ENERGY COMMISSION

Attn: Docket No. 07-AFC-9
1516 Ninth Street, MS-15
Sacramento, CA 95814-5512
docket@energy.state.ca.us

APPLICANT

Southern California Public Power -
Authority (SCPPA)
c/o City of Anaheim
Public Utilities Department
Steve Sciortino, Project Manager
201 S. Anaheim Blvd, Suite 802
Anaheim, CA 92805
ssciortino@anaheim.net
swilson@anaheim.net

APPLICANT CONSULTANT

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COUNSEL FOR APPLICANT

Scott Galati
Galati & Blek, LLP
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Sacramento, CA 95814
sgalati@gb-llp.com

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e-recipient@caiso.com

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DECLARATION OF SERVICE

I, Ashley Y. Garner, declare that on January 28, 2009, I deposited copies of the attached **APPLICATION FOR THE CANYON POWER PLANT** 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.



Ashley Y. Garner