



Cabrillo Power I LLC  
4600 Carlsbad Blvd.  
Carlsbad, CA 92008  
(760) 268-4000

January 28, 2019

**By Email:** SanDiego@waterboards.ca.gov

Mr. Ben Neill  
San Diego Region  
California Regional Water Quality Control Board  
2375 Northside Drive, Suite 100  
San Diego, CA 92108

**Re: Cabrillo Power I LLC – “Comment – Tentative Order No. R9-2019-0003”**

Dear Mr. Neill,

Cabrillo Power I LLC (Cabrillo) appreciates the opportunity to submit these comments in response to the Poseidon Resources (Channelside) LP, Tentative Order (TO) No. R9-2019-0003, National Pollution Discharge Elimination System (NPDES) Permit No. CA109223. Cabrillo would like to commend the San Diego Region California Regional Water Quality Control Board (Water Board) as it has described the separation of NPDES Permit(s) waste discharges and effluent between the Carlsbad Desalination Plant (CDP) and the recently retired Encina Power Station (EPS) (retired December 11, 2018; NPDES No. CA0001350, Order R9-2006-0043 (EPS Order)) for the “interim stand-alone operations” period. However, Cabrillo wants to ensure that the Water Board accurately captures the existing non-contact cooling water system and associated waste flows at EPS that operate for the CDP and should therefore be included in the CDP TO.

Cabrillo would like the Water Board to transfer the EPS Order Fact Sheet sections A.1.a, c, d, and e, as they relate to the non-contact cooling water system. These sub-systems are namely “Cooling Water Pump Lubrication and Seal Water Pretreatment Backwash,” “Traveling Screen Backwash Water,” “Tunnel and Forebay Cleaning,” and “Hypochlorinator DC Rectifier Cooling Water.” These systems will continue to be in-service as long as CDP uses Cabrillo’s non-contact cooling water system on an interim basis.

Should you have any questions regarding the recommendations or comments, please do not hesitate to contact me at [george.piantka@nrg.com](mailto:george.piantka@nrg.com) or (760) 710-2156.

Best Regards,  
On Behalf of Cabrillo Power I LLC

A handwritten signature in black ink that reads "George L. Piantka". The signature is written in a cursive, flowing style.

George L. Piantka  
Sr. Director, Environmental  
NRG Energy, Inc.

cc:

Jerry Carter, NRG Energy, Inc.  
Timothy Sisk, NRG Energy, Inc.  
Sheila Henika, NRG Energy, Inc.