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GOVERNOR



JARED BLUMENFELD  
SECRETARY FOR  
ENVIRONMENTAL PROTECTION

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## State Water Resources Control Board

October 20, 2020

Ms. Jennifer Didlo  
President, AES Southland  
690 North Studebaker Road  
Long Beach, CA 90803

Dear Ms. Didlo:

**RE: INVOICE FOR THE 2018-2019 INTERIM MITIGATION PERIOD FOR ALAMITOS GENERATING STATION - ONCE-THROUGH COOLING POLICY**

This letter serves as an invoice for Alamitos Generating Station's interim mitigation payment for the operating period of October 1, 2018, through September 30, 2019 (2018-2019 interim mitigation period). The final determination calculating the interim mitigation payment is included as Attachment A.

The State Water Resources Control Board's (State Water Board) Statewide Water Quality Control Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling (Once-Through Cooling or OTC Policy) requires owners or operators of existing power plants to implement measures to mitigate interim impingement and entrainment impacts resulting from their cooling water intake structures. The interim mitigation period commenced on October 1, 2015, and continues up to and until owners or operators achieve final compliance with the OTC Policy. Section 2.C(3) of the OTC Policy provides options for demonstrating compliance with the interim mitigation requirements.

As stated in the 2015-2016 Final Determination for Alamitos Generating Station<sup>1</sup>, AES Southland elected to comply with interim mitigation requirements in Section 2.C(3)(b) of the OTC Policy. Under this option, AES Southland demonstrates compliance with the interim mitigation requirement by providing funding to the Ocean Protection Council or State Coastal Conservancy to fund appropriate mitigation projects.

The State Water Board calculated the interim mitigation payment for the 2018-2019 interim mitigation period using information provided by AES Southland in its December 20, 2019 information response letter. The annual interim mitigation payment is the sum of three components: an entrainment payment, an impingement payment, and a

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E. JOAQUIN ESQUIVEL, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

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management and monitoring payment. The interim mitigation payment for Alamitos Generating Station for the operating period of October 1, 2018, through September 30, 2019, is \$605,881.09.

AES Southland has 60 days from receipt of this letter to make this payment to the Natural Resources Agency's Ocean Protection Council. When submitting this payment, include a cover letter that identifies the National Pollution Discharge Elimination System number for Alamitos Generating Station and copy Karen Mogus, Deputy Director of the Division of Water Quality at the State Water Board. Please make the check payable to the Natural Resources Agency and send to:

California Natural Resources Agency  
Attn: Jenn Eckerle  
1416 9<sup>th</sup> Street, Suite 1311  
Sacramento, CA 95814  
Reference Account: Ocean Protection Trust Fund

If you have questions regarding this invoice letter, please contact Julie Johnson at (916) 341-5687 ([Julie.Johnson@waterboards.ca.gov](mailto:Julie.Johnson@waterboards.ca.gov)), or Katherine Walsh at (916) 445-2317 ([Katherine.Walsh@waterboards.ca.gov](mailto:Katherine.Walsh@waterboards.ca.gov)).

Sincerely,



Eileen Sobeck  
Executive Director

Enclosure:  
Attachment A – Final Determination for Alamitos Generating Station

cc:

Mr. Mark Gold  
Executive Director  
Ocean Protection Council  
1416 9<sup>th</sup> Street, Suite 1311  
Sacramento, CA 95814

Ms. Jenn Eckerle  
Deputy Director  
Ocean Protection Council  
1416 9<sup>th</sup> Street, Suite 1311  
Sacramento, CA 95814

Ms. Jennifer Didlo

October 20, 2020

cc via email:

Mr. Weikko Wirta, [Weikko.Wirta@aes.com](mailto:Weikko.Wirta@aes.com)

Ms. Karen Mogus, [Karen.Mogus@waterboards.ca.gov](mailto:Karen.Mogus@waterboards.ca.gov)

Ms. Katherine Walsh, [Katherine.Walsh@waterboards.ca.gov](mailto:Katherine.Walsh@waterboards.ca.gov)

Ms. Julie Johnson, [Julie.Johnson@waterboards.ca.gov](mailto:Julie.Johnson@waterboards.ca.gov)

Ms. Renee Purdy, [Renee.Purdy@waterboards.ca.gov](mailto:Renee.Purdy@waterboards.ca.gov)

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<sup>1</sup> [2015-2016 Final Determination for Alamitos Generating Station.](https://www.waterboards.ca.gov/water_issues/programs/ocean/cwa316/docs/alamitos_1516mitigation_letter.pdf)

<[https://www.waterboards.ca.gov/water\\_issues/programs/ocean/cwa316/docs/alamitos\\_1516mitigation\\_letter.pdf](https://www.waterboards.ca.gov/water_issues/programs/ocean/cwa316/docs/alamitos_1516mitigation_letter.pdf)>

**Attachment A – Final Determination for Alamitos Generating Station**

**FINAL DETERMINATION TO APPROVE MITIGATION MEASURES  
FOR THE WATER QUALITY CONTROL POLICY ON THE USE OF  
COASTAL AND ESTUARINE WATERS FOR POWER PLANT COOLING:**

**ALAMITOS GENERATING STATION  
OCTOBER 1, 2018 THROUGH SEPTEMBER 30, 2019**

Interim Mitigation Requirements and Determinations

The State Water Resources Control Board's (State Water Board) Water Quality Control Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling (also known as the Once-Through Cooling or OTC Policy) requires owners or operators of existing power plants to implement measures to mitigate interim impingement and entrainment impacts resulting from their cooling water intake structures. The interim mitigation period commenced on October 1, 2015, and continues up to and until owners or operators achieve final compliance with the OTC Policy.

The State Water Board approved Alamitos Generating Station's continued request to comply with the interim mitigation measures described in Section 2.C(3)(b) and Section 2.C(3)(e) of the OTC Policy in the Final Determination for the October 1, 2017 to September 30, 2018 interim mitigation period (2018-2019 Final Determination). The 2017-2018 Final Determination included the interim mitigation payment for the period of October 2017 through September 2018. Consistent with Resolution No. 2015-0057<sup>1</sup> and the recommendations in the Expert Review Panel's Final Report<sup>2</sup>, each interim mitigation payment is comprised of an entrainment payment, an impingement payment, and a management and monitoring payment.

In the sections below, the State Water Board calculated Alamitos Generating Station's interim mitigation payment for October 1, 2018, through September 30, 2019, (also known as the 2018-2019 determination period). This calculation is consistent with the methods and calculations applied in the 2017-2018 Final Determination.

Interim Mitigation Payment Calculation for Alamitos Generation Station

*Entrainment Payment Calculation*

To calculate the portion of the interim mitigation payment to offset entrainment impacts, the State Water Board used the default average cost of entrainment determined in the Expert Review Panel's Final Report. Consistent with Resolution No. 2015-0057 and the Expert Review Panel's Final Report, the State Water Board then used a three percent escalator to update the average cost of entrainment from the 2017-2018 Final Determination to 2019 dollars to account for inflation. The resulting average default entrainment cost for October 1, 2018, through September 30, 2019, increased from \$5.02 per million gallons (MG) to \$5.17/MG:

$$(\$5.02/\text{MG} \times 0.03) + \$5.02/\text{MG} = \$5.17/\text{MG}$$

In its December 20, 2019 letter, AES Southland provided the intake volume for Units 1 through 6 for the 2018-2019 determination period of 97,659.1 MG. The State Water Board verified intake volume with the data submitted in the National Pollution Discharge Elimination System permit monitoring reports for Alamitos Generating Station.

To calculate the entrainment payment, the State Water Board multiplied the intake volume by the updated average default cost of entrainment:

$$\$5.17/\text{MG} \times 97,659.1 \text{ MG} = \$504,897.55$$

#### *Impingement Payment Calculation*

In its December 20, 2019 letter, AES Southland provided an estimate of fish impingement biomass for Units 1 through 6 for the 2018-2019 determination period of 4.2 pounds. AES Southland calculated its estimate of fish impingement by using the flow for this interim mitigation period and a quarterly average impingement rate derived from impingement data collected between October 1, 2017, and September 30, 2018. The State Water Board calculated the impingement payment using the calculated total pounds of fish impinged multiplied by the average indirect economic value of the fisheries as determined in the Expert Review Panel's Final Report of \$0.80 per pound:

$$\$0.80/\text{pound} \times 4.2 \text{ pounds} = \$3.36$$

#### *Management and Monitoring Payment Calculation*

The State Water Board calculated the management and monitoring payment by taking twenty percent of the sum of the entrainment and impingement payments:

$$0.20 \times (\$504,897.55 + \$3.36) = \$100,980.18$$

#### State Water Board's Final Determination for Alamitos Generating Station

Based on the sum of the entrainment, impingement, and management and monitoring payment calculations, the total payment to fulfill the interim mitigation obligation for AES Southland's Alamitos Generating Station for the interim mitigation period of October 1, 2018, to September 30, 2019, is \$605,881.09

$$\$504,897.55 + \$3.36 + \$100,980.18 = \$605,881.09$$

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<sup>1</sup> [State Water Board Resolution No. 2015-0057](https://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/2015/rs2015_0057.pdf).

<[https://www.waterboards.ca.gov/board\\_decisions/adopted\\_orders/resolutions/2015/rs2015\\_0057.pdf](https://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/2015/rs2015_0057.pdf)>

<sup>2</sup> [Final Report from the Expert Review Panel](https://www.waterboards.ca.gov/water_issues/programs/ocean/desalination/docs/erp_intake052512.pdf).

<[https://www.waterboards.ca.gov/water\\_issues/programs/ocean/desalination/docs/erp\\_intake052512.pdf](https://www.waterboards.ca.gov/water_issues/programs/ocean/desalination/docs/erp_intake052512.pdf)>