

**SACRAMENTO METROPOLITAN AIR QUALITY  
MANAGEMENT DISTRICT**

For Agenda of **July 27, 2006**

**To:** Board of Directors  
Sacramento Metropolitan Air Quality Management District

**From:** Larry Greene  
Air Pollution Control Officer

**Subject:** Request by Roseville Electric for Emission Reduction Credits from the  
Community Bank for Interdistrict Use

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**Recommendation**

Approve one of the attached resolutions approving one of four versions regarding transferring nitrogen oxide (NOx) credits to Roseville Electric from the Community Bank.

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**Executive Summary**

This item was originally heard by the Board at the June 22, 2006 meeting. The Board heard testimony from Roseville Electric but did not make a decision at that hearing and, therefore this matter is being heard at this July 27, 2006 meeting.

Rule 205, Community Bank and Priority Reserve Bank, requires that requests for emission reduction credits (ERCs) from the Community Bank be brought before the Board when the term of the loan is greater than 5 years or the loan amount is greater than 900 lb/quarter. Staff has received a request from Roseville Electric for a loan that will have a 30 year term and the loan amount is greater than 900 lb/quarter. This request requires Board approval. The credit loan will be used to satisfy emission offset requirements pursuant to Placer County Air Pollution Control District (PCAPCD) Rule 502, New Source Review (NSR). Staff proposes that the Board consider the following options: 1) granting the request; 2) denying the request to preserve the health of the bank; 3) granting the request for 1 year, to allow Roseville Electric time to modify their licensing to allow the use of more plentiful hydrocarbon credits after 1 year; or 4) granting Roseville Electric's revised request that was received June 7th.

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**Attachments**

<b>Attachment</b>	<b>Description</b>	<b>Page #</b>
A	Resolution Granting the Request	8
B	Resolution Denying the Request	11
C	Resolution Granting the Request for One Year	14
D	Resolution Granting Revised Request	17
E	Correspondence from Roseville Electric	20

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## Background

Roseville Electric has requested a loan of 10 tons/year of NOx emission reduction credits from the Community Bank for a term of 30 years. Roseville Electric has constructed an electrical power generating facility which has a maximum capability of up to 160 megawatts. The site is located at 5400 Phillip Road in the City of Roseville across from the Pleasant Grove Wastewater Treatment Plant.

In the fall of 2003, Roseville Electric submitted an Application for Certification for the Roseville Electric Park to the California Energy Commission (CEC). The CEC has the exclusive authority to license power plants that have a generating capacity of 50 megawatts or greater. As part of that licensing procedure, Roseville Electric applied for a Determination of Compliance (DOC) from PCAPCD. The DOC is forwarded to the CEC for consideration in their review of the Application for Certification. During the process Roseville Electric made changes to their original proposal to revise the emission offsets being surrendered for the project and to reduce the permitted quarterly emissions of nitrogen oxides to match the available offsets.

The original application requested an emission limit of 31.09 tons/year of NOx. The applicant was not able to secure enough NOx credits to offset that NOx limit so they requested an additional NOx emission limitation of 23.4 tons/year pending securing enough credits to offset the original amount. In addition this facility triggered offset for PM10. The applicant was able to secure enough PM10 offsets to fully offset the plant.

During the licensing process, Roseville Electric identified additional potential NOx credits from within the Union Pacific Rail yard and Energy 2001 which operates a landfill gas engine. The PCAPCD's Determination of Compliance evaluated an interpollutant trade of 2.6 pounds of hydrocarbon for every pound of NOx plus the appropriate distance ratio for the trade, so the overall trade would require 5.2 pounds of hydrocarbon for every pound of NOx. This option was not pursued in the final licensing.

The Roseville Electric plant consists of: two combustion turbines with supplemental duct fired heat recovery steam generators and one steam generator; selective catalytic reduction (SCR); oxidation catalysts; an auxiliary natural gas-fired boiler rated at 58 mmBTU/hr heat input rate; a 1,133 hp diesel-fired emergency generator; a 300 hp diesel-fired firewater pump; and a four-cell cooling tower. PCAPCD issued their final determination of compliance on November 1, 2004 and the CEC issued their licensing decision on April 13 2005.

Roseville began construction of the plant on August 22, 2005. They anticipate first fire of the equipment to occur in December 2006 with commercial operation beginning May 2007. In order to increase their emission limit from 23.4 tons per year of NOx to 31.09 tons per year, the applicant has to secure additional NOx offsets prior to the first firing of the equipment. The Union Pacific Rail Yard and Energy 2001 were both dropped by Roseville Electric.

Roseville Electric has requested the use of NOx credits from the Community Bank to offset an additional 4.76 tons per year of NOx for the life of the plant, 30 years. The offset distance ratio that would be applied to this trade, based on PCAPCD Rule 502, is 2.1 to 1.0 requiring 10 tons per year of credits. As has been indicated by CEC staff, since this request does not fully offset the maximum potential to emit of 31.09 tons per year, Roseville Electric will have to amend their CEC licensing.

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### Community Bank Approval Process

Rule 205, Section 310 states that the District Board of Directors must approve loan applications to the Community Bank prior to disbursement. This request was unable to be decided at the June 22, 2006 meeting because of a lost of quorum of Board members. If approved, this request for the emission reduction credits will be effective July 1, 2006.

In approving a loan request, the Board must consider the extent to which cleaner innovative technologies have been used to minimize credit needs and may conditionally grant loans to protect the health of the bank or to promote cleaner, innovative technology. The Board may deny any application if it determines that the denial is in the best interest of the Sacramento Federal Ozone Nonattainment Area.

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### Use of Clean Technology

The turbines and auxiliary boiler triggered Best Available Control Technology (BACT) requirements. The turbines are permitted to emit no more than 2 ppmvd of NO<sub>x</sub> @ 15% O<sub>2</sub> averaged over 1 hour and the boiler is permitted to emit no more than 9 ppmv @ 3% O<sub>2</sub> average over three hours. The limit for the gas turbines meets CARB's BACT Guidelines for gas turbines and is equivalent to the limit that District staff set for the Cosumnes Power Plant. The boiler NO<sub>x</sub> emissions will meet the District's Rule 411, NO<sub>x</sub> from Boilers, Process Heaters and Steam Generators emission limitations for this size of boiler, that become effective in October 2007.

Rule 205, Section 310.5 allows the Board the authority to place conditions on loan approvals in order to protect the health of the bank or to promote new clean technology. Staff recommends that no additional conditions be placed on this loan to promote clean technology.

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### Loan Applications Under Consideration

There was an additional loan request for NO<sub>x</sub> that the Board considered as part of the consent calendar at the June 22, 2006 hearing. The loan was for 427 lbs/year of NO<sub>x</sub> (0.21 tons/year) for Grafil Inc (See June 22, 2006, Board Agenda Item #4) which was approved.

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### Health of the Bank

The current ROC, NO<sub>x</sub>, and PM<sub>10</sub> balances in the three accounts are:

Pollutant	Account Balances (tons per year)			Total (tons per year)
	Military Base	Essential Public Services	Community Bank	
ROC	210.84	25.85	260.67	497.4
NO <sub>x</sub>	38.04	34.07	14.71	86.8
PM <sub>10</sub>	4.73	8.45	0.89	14.1

The approval of the Grafil loan request does not affect the account balances because that request was for a renewal of a loan. If this loan request is approved as requested the NOx account balance for the Community Bank will be 9,415 pounds per year (4.7 tons per year).

Rule 205, Section 306, gives the Board the authority to transfer unused emission reduction credits between all three accounts if there is a determination of need for requesting sources. Even with this authority, as is discussed below, there is not enough NOx emission reduction credits available in the bank for the anticipated uses in the future.

The primary intent of the Community Bank is to provide emission reduction credits for use by smaller stationary sources as offsets for both New Source Review requirements and for alternative compliance for prohibitory rules. The District Board adopted amendments to the NOx emission limits in Rule 411 that will become effective in October 2007. When Rule 411 was amended in May 1997, stationary sources used the Community Bank to get additional time to comply with the rule limits. Most of those sources used credits for one to three years. A total of 66.4 tons per year of NOx was used for alternative compliance during that time.

With the recent amendments to Rule 411, there may be a similar need of Community Bank credits starting in October 2007. During the rulemaking process there were 5 - 6 sources that stated they may need to use alternative compliance to meet the new Rule 411 limits. The NOx needed for those known sources would be 6.2 - 50 tons/year of NOx. There may be additional unknown sources that may also choose to use alternative compliance for this rule. If the request is granted there will not be sufficient credits in the Community Bank to meet this need.

In addition, although not approved at this time to go forward, Phase II of the Consumnes Power Plant may be needed. SMUD is still in the process of identifying and buying emission reduction credits. If the plant ever goes forward, SMUD may need enough emission reduction credits to offset an additional 126 tons per year of NOx.

Since Roseville Electric dropped pursuing credits with Union Pacific, a project is being pursued at the Roseville Rail Yard, in conjunction with PCAPCD, to create emission reductions from the installation of an add-on control device at the maintenance yard. An Advanced Locomotive Emission Control System (ALECS) demonstration project will be performed at the Roseville Rail Yard this summer and fall. The demonstration project consists of an articulated bonnet or hood which captures the locomotive exhaust and delivers it to an emission control system consisting of a sodium hydroxide wash to remove sulfur dioxide, a dual chamber cloud chamber scrubber for particulate matter removal, followed by a SCR system using urea to reduce NOx. The final report of the demonstration project is due by the end of November 2006. Depending on the results, this may become a viable option for the Rail Yard and may create emission reduction credits that could be used by Roseville Electric. It may take 3 - 5 years for this project to be implemented if it goes forward.

Rule 205, Section 310.3 allows the Board to deny any application if it determines that the denial is in the best interest of the Sacramento Federal 1-hour Ozone Nonattainment Area. In addition, Rule 205, Section 310.5 allows the Board to conditionally grant loans to protect the health of the bank.

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With the identified potential needs of the Community Bank in the future, the Board may want to consider other options in disbursing the credit to Roseville Electric. See the Credit Disbursement options section, which identifies options the Board could choose to take in this case.

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### **Correspondence from Roseville Electric**

On March 16, 2006, Roseville Electric submitted a request to the District for 10 tons of NOx credits from the Community Bank for a 30 year duration. This is the request that triggered this Board item. On June 7, 2006, Roseville Electric supplemented this request by indicating that they were aware of some possible sources of NOx credits within Placer County that may become available within 3-5 years. Therefore, they indicated that if the Board chose they would consider an alternative of a 5 year lease of NOx credits. In addition they also offered an alternative of a 5 year lease of NOx while they are amending their CEC licensing and then having the loan switch to hydrocarbon for an additional 5 years. Both of these correspondences can be found in Attachment D.

In addition Roseville Electric states that the additional Community Bank credits will allow Roseville Electric to generate more power during periods of peak energy demand, providing needed power that benefits the entire electrical grid in the greater Sacramento area.

Both of the proposed options would have an impact in the identified needs of NOx credits that was discussed above.

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### **Credit Disbursement Options**

#### Option 1 (see Resolution A)

This option would grant the NOx credit as requested. Roseville Electric would have 10 tons per year of NOx credit disbursed to them for 30 years. The impacts of this option are as follows:

- The Community Account balance will drop to 4.7 tons per year leaving less NOx credits available for upcoming alternative compliance needs.
- The loan cost would be \$319, 200.

#### Option 2 (see Resolution B)

This option would be to deny the request. The impacts of this option are as follows:

- Roseville Electric would still be able to operate up to their cap of 23.4 tons per year NOx
- Roseville Electric could then amend their CEC licensing later if:
  - they were able to obtain NOx credits from another source like the Roseville Rail Yard; or
  - they want to pursue using an interpollutant trade of hydrocarbon for NOx. There are enough hydrocarbon credits in the Community Bank to then fund this credit need and this funding would not impact any known future needs of hydrocarbon credits
- The full amount of NOx credits would remain in the Community Bank for use by sources that need additional time to comply with Rule 411.

Option 3 (see Resolution C)

This option would be to grant the use of the NOx credit for only one year. The impacts of this option are as follows:

- Part of the NOx credits would be returned back to the Community Bank for use by sources that need additional time to comply with Rule 411. The credits that went to the distance ratio, 5.24 tons per year, would be permanently retired for breather benefit. The amount of NOx credit that would be returned to the Community Bank is 4.76 tons per year.
- Roseville Electric would be able to operate up to a cap of 28.16 tons year of NOx after amending their CEC licensing to accept the 28.16 tons per year of NOx.
- Roseville Electric could then amend their CEC licensing during that year to use an interpollutant trade of hydrocarbon for NOx. Once their license is approved they could return to the Community Bank to request the use of hydrocarbon credit. The cost of a 30 year hydrocarbon loan to offset the remainder of the 31.09 cap would be \$1,172,052. If they choose to request a shorter time period, as is indicated in their June 7<sup>th</sup> letter, then the cost would be \$351,616.

Option 4 (see Resolution D)

This option would grant the revised NOx credit as requested Roseville Electric's June 7<sup>th</sup> letter. Roseville Electric would have 10 tons per year of NOx credit disbursed to them for 5 years. The impacts of this option are as follows:

- The Community Account balance will drop to 4.7 tons per year leaving less NOx credits available for upcoming alternative compliance needs. At the end of five years, 4.76 tons per year of NOx would be returned to the Community Bank.
- The loan cost would be \$53,200.

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**Priority Determination**

Rule 205, Section 311, Community Bank Loan Prioritization, states that if loan requests exceed the quarterly funding cap, all loan applications in the funding cycle shall be prioritized. The total amounts of credits requested for this quarter do not exceed the funding caps.

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**Interdistrict Approval**

At the July 23, 1998 Board meeting, the Board delegated its authority granted under Health and Safety Code Section 40709.6 to the Air Pollution Control Officer allowing the Air Pollution Control Officer to review and approve interdistrict emission offsets when the request is less than the major source trigger levels, which this request is. If the Board approves the use of a loan by Roseville Electric, then the Air Pollution Control Officer will review and approve the use of those emission reduction credit in accordance with the delegation.

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## **Conclusion**

Staff recommends that the Board consider the health of the Community Bank and the potential future needs of credits to give sources additional time to comply with the Rule 411 limits and approve one of the four options identified by Staff.

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Respectfully submitted,

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Larry Greene  
Air Pollution Control Officer  
Sacramento Metropolitan  
Air Quality Management District

Approved as to form:

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Kathy Pittard  
District Counsel  
Sacramento Metropolitan  
Air Quality Management District

Attachment: Resolution

**Attachment A**

**Resolution Granting the Request**

# Resolution A

RESOLUTION NO. AQM \_\_\_\_\_  
BOARD OF DIRECTORS  
OF THE SACRAMENTO METROPOLITAN AIR QUALITY  
MANAGEMENT DISTRICT

WHEREAS, the Board of Directors of the Sacramento Metropolitan Air Quality Management District adopted Rule 205, COMMUNITY BANK AND PRIORITY RESERVE BANK; and

WHEREAS, pursuant to Rule 205, Section 101, the Community Bank is a depository of certified emission reduction credits which may be loaned for compliance with rules and regulations or for offset requirements of new source review; and

WHEREAS, there are no NOx emission reduction credits in the possession of Roseville Electric at this time; and

WHEREAS, Rule 205, COMMUNITY BANK AND PRIORITY RESERVE BANK, Section 310 requires that loan applications to the Community Bank for amounts greater than 900 pounds per quarter and/or longer than 5 years must be approved by the District Board of Directors prior to disbursement; and

WHEREAS, pursuant to Rule 205, Section 310, the Board of Directors of the Sacramento Metropolitan Air Quality Management District shall consider the extent to which cleaner innovative technologies have been used to minimize the credits needed; and

WHEREAS, pursuant to Rule 205, Section 310, the Board of Directors of the Sacramento Metropolitan Air Quality Management District may conditionally grant loans to protect the health of the bank or to promote cleaner, innovative technology; and

WHEREAS, Roseville Electric is using gas turbines and an auxiliary boiler that meets Best Available Control Technology Requirements.

NOW, THEREFORE, BE IT RESOLVED THAT the Board of Directors of the Sacramento Metropolitan Air Quality Management District authorizes and directs the transfer of the following NOx emission reduction credits from the Community Bank to Roseville Electric for use with #03-AFC-01 for a term of thirty years:

## Resolution A (continued)

<b>NOx Community Bank Transfer to Roseville Electric</b> (Pounds per Calendar Quarter)					
AFC #	1 <sup>st</sup> Quarter	2 <sup>nd</sup> Quarter	3 <sup>rd</sup> Quarter	4 <sup>th</sup> Quarter	Total lb/yr
03-AFC-01	5,300	5,300	5,250	4,150	20,000

BE IT ORDERED that, pursuant to Rule 205, Section 310.4, the transfer be effective July 1, 2006.

ON A MOTION by Director \_\_\_\_\_, seconded by Director \_\_\_\_\_, the foregoing resolution was passed and adopted by the Board of Directors of the Sacramento Metropolitan Air Quality Management District, State of California, this 27th day of July 2006, by the following vote, to wit:

AYES:           Directors

NOES:           Directors

ABSENT:        Directors

\_\_\_\_\_  
Chairperson of the Board  
Sacramento Metropolitan Air  
Quality Management District  
State of California

(SEAL)

ATTEST: \_\_\_\_\_  
Clerk of the Board  
Sacramento Metropolitan Air Quality Management District

## **Attachment B**

### **Resolution Denying the Request**

## **Resolution B**

RESOLUTION NO. AQM \_\_\_\_\_  
BOARD OF DIRECTORS  
OF THE SACRAMENTO METROPOLITAN AIR QUALITY  
MANAGEMENT DISTRICT

WHEREAS, the Board of Directors of the Sacramento Metropolitan Air Quality Management District adopted Rule 205, COMMUNITY BANK AND PRIORITY RESERVE BANK; and

WHEREAS, pursuant to Rule 205, Section 101, the Community Bank is a depository of certified emission reduction credits which may be loaned for compliance with rules and regulations or for offset requirements of new source review; and

WHEREAS, Rule 205, COMMUNITY BANK AND PRIORITY RESERVE BANK, Section 310 requires that loan applications to the Community Bank for amounts greater than 900 pounds per quarter and/or longer than 5 years must be approved by the District Board of Directors prior to disbursement; and

WHEREAS, pursuant to Rule 205, Section 310, the Board of Directors of the Sacramento Metropolitan Air Quality Management District shall consider the extent to which cleaner innovative technologies have been used to minimize the credits needed; and

WHEREAS, pursuant to Rule 205, Section 310.3, the Board of Directors of the Sacramento Metropolitan Air Quality Management District may deny any application if it determines that the denial is in the best interest of the Sacramento Federal 1-hour Ozone Nonattainment Area; and

WHEREAS, Roseville Electric has surrendered enough emission reduction credits to operate at a limit of 23.4 tons per year of NOX; and

WHEREAS, there are future needs of NOx credits that are likely to exceed the credits available in the bank.

NOW, THEREFORE, BE IT RESOLVED THAT the Board of Directors of the Sacramento Metropolitan Air Quality Management District has determined that it is not in the best interest of the Sacramento Federal 1-hour Ozone Nonattainment Area to approve the request by Roseville Electric; and

BE IT RESOLVED THAT the Board of Directors of the Sacramento Metropolitan Air Quality Management District denies the request for NOx emission reduction credits by Roseville Electric.

## Resolution B (continued)

ON A MOTION by Director \_\_\_\_\_, seconded by Director \_\_\_\_\_,  
the foregoing resolution was passed and adopted by the Board of Directors of the  
Sacramento Metropolitan Air Quality Management District, State of California, this 27th  
day of July 2006, by the following vote, to wit:

AYES: Directors

NOES: Directors

ABSENT: Directors

\_\_\_\_\_  
Chairperson of the Board  
Sacramento Metropolitan Air  
Quality Management District  
State of California

(SEAL)

ATTEST: \_\_\_\_\_  
Clerk of the Board  
Sacramento Metropolitan Air Quality Management District

## **Attachment C**

### **Resolution Granting the Request for One Year**

## Resolution C

RESOLUTION NO. AQM \_\_\_\_\_  
BOARD OF DIRECTORS  
OF THE SACRAMENTO METROPOLITAN AIR QUALITY  
MANAGEMENT DISTRICT

WHEREAS, the Board of Directors of the Sacramento Metropolitan Air Quality Management District adopted Rule 205, COMMUNITY BANK AND PRIORITY RESERVE BANK; and

WHEREAS, pursuant to Rule 205, Section 101, the Community Bank is a depository of certified emission reduction credits which may be loaned for compliance with rules and regulations or for offset requirements of new source review; and

WHEREAS, there are no NOx emission reduction credits in the possession of Roseville Electric at this time; and

WHEREAS, Rule 205, COMMUNITY BANK AND PRIORITY RESERVE BANK, Section 310 requires that loan applications to the Community Bank for amounts greater than 900 pounds per quarter and/or longer than 5 years must be approved by the District Board of Directors prior to disbursement; and

WHEREAS, pursuant to Rule 205, Section 310, the Board of Directors of the Sacramento Metropolitan Air Quality Management District shall consider the extent to which cleaner innovative technologies have been used to minimize the credits needed; and

WHEREAS, pursuant to Rule 205, Section 310, the Board of Directors of the Sacramento Metropolitan Air Quality Management District may conditionally grant loans to protect the health of the bank or to promote cleaner, innovative technology; and

WHEREAS, Roseville Electric is using gas turbines and an auxiliary boiler that meets Best Available Control Technology Requirements.

WHEREAS, there are future needs of NOx credits that are likely to exceed the credits available in the bank.

NOW, THEREFORE, BE IT RESOLVED THAT the Board of Directors of the Sacramento Metropolitan Air Quality Management District authorizes and directs the transfer of the following NOx emission reduction credits from the Community Bank to Roseville Electric for use with #03-AFC-01 for a term of one year:

## Resolution C (continued)

<b>NOx Community Bank Transfer to Roseville Electric</b> (Pounds per Calendar Quarter)					
<b>AFC #</b>	<b>1<sup>st</sup> Quarter</b>	<b>2<sup>nd</sup> Quarter</b>	<b>3<sup>rd</sup> Quarter</b>	<b>4<sup>th</sup> Quarter</b>	<b>Total lb/yr</b>
03-AFC-01	5,300	5,300	5,250	4,150	20,000

BE IT ORDERED that, pursuant to Rule 205, Section 310.4, the transfer be effective July 1, 2006.

ON A MOTION by Director \_\_\_\_\_, seconded by Director \_\_\_\_\_, the foregoing resolution was passed and adopted by the Board of Directors of the Sacramento Metropolitan Air Quality Management District, State of California, this 27th day of July 2006, by the following vote, to wit:

AYES: Directors

NOES: Directors

ABSENT: Directors

\_\_\_\_\_  
Chairperson of the Board  
Sacramento Metropolitan Air  
Quality Management District  
State of California

(SEAL)

ATTEST: \_\_\_\_\_  
Clerk of the Board  
Sacramento Metropolitan Air Quality Management District

**Attachment D**

**Resolution Granting the Request**

## Resolution D

RESOLUTION NO. AQM \_\_\_\_\_  
BOARD OF DIRECTORS  
OF THE SACRAMENTO METROPOLITAN AIR QUALITY  
MANAGEMENT DISTRICT

WHEREAS, the Board of Directors of the Sacramento Metropolitan Air Quality Management District adopted Rule 205, COMMUNITY BANK AND PRIORITY RESERVE BANK; and

WHEREAS, pursuant to Rule 205, Section 101, the Community Bank is a depository of certified emission reduction credits which may be loaned for compliance with rules and regulations or for offset requirements of new source review; and

WHEREAS, there are no NOx emission reduction credits in the possession of Roseville Electric at this time; and

WHEREAS, Rule 205, COMMUNITY BANK AND PRIORITY RESERVE BANK, Section 310 requires that loan applications to the Community Bank for amounts greater than 900 pounds per quarter and/or longer than 5 years must be approved by the District Board of Directors prior to disbursement; and

WHEREAS, pursuant to Rule 205, Section 310, the Board of Directors of the Sacramento Metropolitan Air Quality Management District shall consider the extent to which cleaner innovative technologies have been used to minimize the credits needed; and

WHEREAS, pursuant to Rule 205, Section 310, the Board of Directors of the Sacramento Metropolitan Air Quality Management District may conditionally grant loans to protect the health of the bank or to promote cleaner, innovative technology; and

WHEREAS, Roseville Electric is using gas turbines and an auxiliary boiler that meets Best Available Control Technology Requirements.

NOW, THEREFORE, BE IT RESOLVED THAT the Board of Directors of the Sacramento Metropolitan Air Quality Management District authorizes and directs the transfer of the following NOx emission reduction credits from the Community Bank to Roseville Electric for use with #03-AFC-01 for a term of five years:

## Resolution D (continued)

<b>NOx Community Bank Transfer to Roseville Electric</b> (Pounds per Calendar Quarter)					
<b>AFC #</b>	<b>1<sup>st</sup> Quarter</b>	<b>2<sup>nd</sup> Quarter</b>	<b>3<sup>rd</sup> Quarter</b>	<b>4<sup>th</sup> Quarter</b>	<b>Total lb/yr</b>
03-AFC-01	5,300	5,300	5,250	4,150	20,000

BE IT ORDERED that, pursuant to Rule 205, Section 310.4, the transfer be effective July 1, 2006.

ON A MOTION by Director \_\_\_\_\_, seconded by Director \_\_\_\_\_, the foregoing resolution was passed and adopted by the Board of Directors of the Sacramento Metropolitan Air Quality Management District, State of California, this 27th day of July 2006, by the following vote, to wit:

AYES: Directors

NOES: Directors

ABSENT: Directors

\_\_\_\_\_  
Chairperson of the Board  
Sacramento Metropolitan Air  
Quality Management District  
State of California

(SEAL)

ATTEST: \_\_\_\_\_  
Clerk of the Board  
Sacramento Metropolitan Air Quality Management District

## **Attachment E**

### **Correspondence from Roseville Electric**