

Delta Energy Center, LLC.

1200 Arcy Lane
Pittsburg, CA 94565

April 27, 2026

Compliance and Enforcement Division
Bay Area Air Quality Management District
375 Beale Street, Suite 600
San Francisco, CA 94105

TV Tracking #1353 (Semi-Annual)

1. ☐ RECEIVED IN
ENFORCEMENT: 04/30/2026

Re: Delta Energy Center Facility B2095
Title V Semi-Annual Continuous Emission Monitoring Report
Reporting Period: October 1, 2025 through March 31, 2026

Attn: Title V Reports

Enclosed is the Title V Semi-Annual Continuous Emissions Monitoring Report for the Delta Energy Center (DEC). During the reporting period, the CEMS recorded one excess emissions event as indicated in the attached report.

DEC submitted the RCA Notification for this event to the District on January 29, 2026. The 10-Day Report was submitted to the District on February 4, 2026 and the 30-Day report was submitted to the District on February 20, 2026. A Notice of Violation has not been issued for this event.

All previously submitted CEMS Monitoring documentation will not be reproduced in this report.

Should you have any questions, please contact Diana West at (925) 252-2069.

As a Responsible Official, I certify that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

Sincerely,



Alfonso Rodriguez

Authorized Signatory and General Manager

cc:	John Heiser, California Energy Commission	via email attachment
	EPA Region 9	via email attachment
	EHSWalnutCreek@calpine.com	via email attachment

Attachments:

DEC Title V Semi-Annual CEMS Monitoring Report
DEC 30-Day Report for the Unit 3 Heat Input Exceedance

DS
JG

DEC Title V Semi-Annual CEMS Monitoring Report
Reporting Period 10/1/2025 - 3/31/2026

Delta Energy Center
Title V CEMS Semi-Annual Monitoring Report
10/1/2025-3/31/2026

Table VII – A
Applicable Limits and Compliance Monitoring Requirements
S-1, S-3, S-5 T
S-2, S-4, S-6 Heat Recovery Steam Generators

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
NO _x	BAAQMD 9-3-303	N		125 ppm	BAAQMD 1-520.1	C	CEM	X	
NO _x	BAAQMD 9-301.2	N		0.15 lb./MW-hr. or 5 ppmv	BAAQMD 9-9-501	C	CEM	X	
NO _x	SIP 9-9-301.3	N		9 ppmv 15% O ₂ , dry	SIP 9-9-501	C	CEM	X	
NO _x	NSPS, 40 CFR 60.44 (a)(4)	Y		0.2 lb./MMBtu, 30-day rolling average	40 CFR 60.48 (b) and BAAQMD condition #17154	C	CEM	X	
NO _x	NSPS, 40 CFR 60.332 (a)(1)	Y		75 ppmv, @ 15% O ₂ , dry	40 CFR 60.334(c) and BAAQMD Condition 17154, Part 39b	C	CEM	X	
NO _x	40 CFR 75.10	Y		The owner or operator shall ensure that all continuous emission and opacity monitoring systems required by this part are in operation and monitoring unit emission	40 CFR 75.10	C	CEM	X	

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Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
NO _x	BAAQMD condition #17154, Part 22a	Y		19.2 lb./hr., for each turbine and HRSG combined, except during turbine startup, shutdown, steam turbine cold start-up, or combustor tuning period	BAAQMD condition #17154, Part 39b	C	CEM	X	
NO _x	BAAQMD condition #17154, Part 22a	Y		19.2 lb./hr., for each turbine and HRSG combined, except during turbine startup, shutdown, steam turbine cold start-up, or combustor tuning period	BAAQMD condition #17154, Part 43	P/A	Source test at maximum load	X	
NO _x	BAAQMD condition #17154, Part 22a	Y		0.00904 lb./MM BTU, for each turbine and HRSG combined, except during turbine startup, shutdown, steam turbine cold start-up, or combustor tuning period	BAAQMD condition #17154, Part 39b	C	CEM	X	
NO _x	BAAQMD condition #17154, Part 22a	Y		0.00904 lb./MM BTU, for each turbine and HRSG combined, except during turbine startup, shutdown, steam turbine cold start-up, or combustor tuning period	BAAQMD condition #17154, Part 43	P/A	Source test at maximum load	X	

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Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
NO _x	BAAQMD condition #17154, Part 22b	Y		2.5 ppmv, 15% O ₂ , dry, for each turbine and HRSG combined, 1-hr average except during turbine startup, shutdown, steam turbine cold start-up, or combustor tuning period	BAAQMD condition #17154, Part 43	P/A	Source test at maximum load	X	
NO _x	BAAQMD condition #17154, Part 22b	Y		2.5 ppmv, 15% O ₂ , dry, for each turbine and HRSG combined, 1-hr average except during turbine startup, shutdown, steam turbine cold start-up, or combustor tuning period	BAAQMD condition #17154, Part 39b	C	CEM	X	
NO _x	BAAQMD condition #17154, Part 23	Y		240 lb./turbine during start-up	BAAQMD condition #17154, Part 39b	C	CEM	X	
NO _x	BAAQMD condition #17154, Part 23	Y		80 lb./turbine during shutdown	BAAQMD condition #17154, Part 39b	C	CEM	X	
NO _x	BAAQMD condition #17154, Part 23	Y		300 lb./turbine during steam turbine cold start-up or combustor tuning period	BAAQMD condition #17154, Part 39b	C	CEM	X	

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Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
NO _x	BAAQMD condition #17154, Part 36a	Y		1990.8 lb./day for turbines and HRSGs combined	BAAQMD condition #17154, Part 39b	C	CEM	X	
NO _x	BAAQMD condition #17154, Part 37a	Y		240.2 ton/yr for turbines and HRSGs combined	BAAQMD condition #17154, Part 39b	C	CEM	X	
CO	BAAQMD condition #17154, Part 22c	Y		46.75 lb./hr., for each turbine and HRSG combined, except during turbine startup, shutdown, steam turbine cold start-up, or combustor tuning period	BAAQMD condition #17154, Part 43	P/A	Source test at maximum and minimum load	X	
CO	BAAQMD condition #17154, Part 22c	Y		46.75 lb./hr., for each turbine and HRSG combined, except during turbine startup, shutdown, steam turbine cold start-up, or combustor tuning period	BAAQMD condition #17154, Part 39b	C	CEM	X	
CO	BAAQMD condition #17154, Part 22c	Y		0.022 lb./MM BTU, for each turbine and HRSG combined, except during turbine startup, shutdown, steam turbine cold start-up, or combustor tuning period	BAAQMD condition #17154, Part 43	P/A	Source test at maximum and minimum load	X	

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Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
CO	BAAQMD condition #17154, Part 22c	Y		0.022 lb./MM BTU, for each turbine and HRSG combined, except during turbine startup, shutdown, steam turbine cold start-up, or combustor tuning period	BAAQMD condition #17154, Part 39b	C	CEM	X	
CO	BAAQMD condition #17154, Part 22d	Y		10 ppmv, 15% O ₂ , dry, for each turbine and HRSG combined, 3-hr average except during turbine startup, shutdown, steam turbine cold start-up, or combustor tuning period	BAAQMD condition #17154, Part 39b	C	CEM	X	
CO	BAAQMD condition #17154, Part 22d	Y		10 ppmv, 15% O ₂ , dry, for each turbine and HRSG combined, 3-hr average except during turbine startup, shutdown, steam turbine cold start-up, or combustor tuning period	BAAQMD condition #17154, Part 43	P/A	Source test at maximum and minimum load	X	
CO	BAAQMD condition #17154, Part 23	Y		2514 lb./turbine during start-up	BAAQMD condition #17154, Part 39b	C	CEM	X	

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Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
CO	BAAQMD condition #17154, Part 23	Y		902 lb./turbine during shutdown	BAAQMD condition #17154, Part 39b	C	CEM	X	
CO	BAAQMD condition #17154, Part 23	Y		9,750 lb./turbine during steam turbine cold start-up or combustor tuning period	BAAQMD condition #17154, Part 39b	C	CEM	X	
CO	BAAQMD condition #17154, Part 36b	Y		12,756.4 lb./day for turbines and HRSGs combined	BAAQMD condition #17154, Part 39b	C	CEM	X	
CO	BAAQMD condition #17154, Part 37b	Y		1,105.4 ton/yr for turbines and HRSGs combined	BAAQMD condition #17154, Part 39b	C	CEM	X	
CO	40 CFR 75.10	Y		None	40 CFR 75.10	C	fuel flow monitor and CO ₂ calculation	X	
SO ₂	BAAQMD 9-1-301	Y		GLC ¹ of 0.5 ppm for 3 min or 0.25 ppm for 60 min or 0.05 ppm for 24 hours		N		N/A	
SO ₂	BAAQMD 9-1-302	Y		300 ppm (dry)		N		N/A	
SO ₂	NSPS 40 CFR 60.43a (b)(2)	Y		0.2 lb./MMBtu, 24 hr. average except during startup, shutdown		N		N/A	
SO ₂	NSPS 40 CFR 60.333	Y		0.015% (vol) 15% O ₂ (dry) or total sulfur content of fuel less than or equal to 0.8% sulfur by weight (8,000 ppmw)	NSPS 40 CFR 60.334 (h) (3) (ii) and BAAQMD Condition 17154, Part 57	P/M	Fuel sulfur content testing	X	

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Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
SO ₂		Y		None	40 CFR 75.11, 40 CFR 75, Appendix D, Part 2.3		Fuel measurements, calculations	X	
SO ₂	BAAQMD condition #17154, Part 14	Y		Fuel sulfur content of 1.0 gr/100 scf	BAAQMD condition #17154, Part 57	P/M	Fuel testing	X	
SO ₂	BAAQMD condition #17154, Part 37e	Y		18.42 ton/yr for turbines and HRSGs combined	BAAQMD condition #17154, Part 40	P/D	Fuel sulfur content testing, natural gas usage records, calculations	X	
Opacity	BAAQMD 6-1-301	N		> Ringelmann No. 1 for no more than 3 minutes in any hour		N		N/A	
Opacity	SIP 6-301	Y		> Ringelmann No. 1 for no more than 3 minutes in any hour		N		N/A	
Visible Particles	BAAQMD 6-1-305	N		No particles from any operation in sufficient number and large enough to be visible as individual particles at the emission point, or of such size and nature as to be visible individually, or fall on real property other than the property of the owner		N		X	
FP	SIP 6-310	Y		0.15 grain/dscf		N		N/A	

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Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
FP	SIP 6-310.3	Y		0.15 grain/dscf @ 6% O ₂		N		N/A	
Opacity	BAAQMD 6-1-304	N		During tube cleaning, Ringelmann No. 2 for 3 min/hr. and 6 min/billion btu/24 hours		N		N/A	
Opacity	SIP 6-304	Y		During tube cleaning, Ringelmann No. 2 for 3 min/hr. and 6 min/billion btu/24 hours		N		N/A	
PM ₁₀	BAAQMD condition #17154, Part 22h	Y		9.0 lb./hr., for each turbine and HRSG combined	BAAQMD condition #17154, Part 43	P/A	Source test at maximum load	X	
PM ₁₀	BAAQMD condition #17154, Part 22h	Y		0.00424 lb./MM BTU, for each turbine and HRSG combined	BAAQMD condition #17154, Part 43	P/A	Source test at maximum load	X	
PM ₁₀	BAAQMD condition #17154, Part 22h	N		0.00424 lb./MM BTU, for each turbine and HRSG combined	BAAQMD condition #17154, Part 43	P/A	Source test at maximum load	X	
PM ₁₀	BAAQMD condition 17154, Part 36d	N		648 lb./day for turbines and HRSGs combined	BAAQMD condition #17154, Part 40	P/D	Records, calculations	X	
PM ₁₀	BAAQMD condition 17154, Part 37d	N		118.26 ton/yr for turbines and HRSGs combined	BAAQMD condition #17154, Part 40	P/D	Records, calculations	X	

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Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
POC	BAAQMD condition #17154, Part 22f	Y		5.33 lb./hr. (as CH ₄) for each turbine, and HRSG combined except during turbine startup, shutdown, steam turbine cold start-up, or combustor tuning period	BAAQMD condition #17154, Part 43	P/A	Source test at maximum load	X	
POC	BAAQMD condition #17154, Part 22f	Y		0.00251 lb./MM BTU (as CH ₄) for each turbine, and HRSG combined except during turbine startup, shutdown, steam turbine cold start-up, or combustor tuning period	BAAQMD condition #17154, Part 43	P/A	Source test at maximum load	X	
POC	BAAQMD condition #17154, Part 23	Y		48 lb./turbine during start-up	BAAQMD condition #17154, Part 40	P/D	Records, calculations	X	
POC	BAAQMD condition 17154, Part 23	Y		16 lb./turbine during shutdown	BAAQMD condition #17154, Part 40	P/D	Records, calculations	X	
POC	BAAQMD condition 17154, Part 23	Y		96 lb./turbine during steam turbine cold start-up or combustor tuning period	BAAQMD condition #17154, Part 40	P/D	Records, calculations	X	
POC	BAAQMD condition 17154, Part 36c	Y		478.2 lb./day (as CH ₄) for turbines and HRSGs combined	BAAQMD condition #17154, Part 40	P/D	Records, calculations	X	

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Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
POC	BAAQMD condition 17154, Part 37c	Y		64.68 ton/yr for turbines and HRSGs combined	BAAQMD condition #17154, Part 40	P/D	Records, calculations	X	
NH ₃	BAAQMD condition #17154, Part 22e	N		10 ppmv, 15% O ₂ , dry, averaged over 3 hrs. for each turbine and HRSG combined except during turbine startup, shutdown, steam turbine cold start-up, or combustor tuning period	BAAQMD condition #17154, Part 39c	C	Ammonia injection rate monitor	X	
Formaldehyde	BAAQMD condition #17154, Part 38a	N		5691 lb./yr for turbine and HRSGs combined	BAAQMD condition #17154, Part 41	P/D	Records, calculations	X	
Formaldehyde	BAAQMD condition #17154, Part 34a	N		5691 lb./yr for turbine and HRSGs combined	BAAQMD condition #17154, Part 44	P/every two years on P-1, P-2, or P-3	Source test	X	
Benzene	BAAQMD condition #17154, Part 38b	N		704 lb./yr for turbines, HRSGs, and auxiliary boiler combined	BAAQMD condition #17154, Part 41	P/D	Records, calculations	X	
Benzene	BAAQMD condition #17154, Part 38b	N		704 lb./yr for turbines and HRSGs combined	BAAQMD condition #17154, Part 45	P/every two years on P-1, P-2, or P-3	Source test	X	
Specified PAH's	BAAQMD condition #17154, Part 38c	N		120 lb./yr for turbines, HRSGs, and auxiliary boiler combined	BAAQMD condition #17154, Part 41	P/D	Records, calculations	X	

Delta Energy Center
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Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Specified PAH's	BAAQMD condition #17154, Part 38c	N		120 lb./yr for turbines and HRSGs combined	BAAQMD condition #17154, Part 41	P/every two years on P-1, P-2, or P-3	Source test	X	
Heat input limit		Y		None	40 CFR 75.10	C	Fuel meter, firing monitor, calculations	X	
Heat input limit	BAAQMD condition #17154, Part 15	Y		2,125 MM BTU/hr. (HHV), 3-hr average for each Turbine and HRSG, total	BAAQMD condition #17154, Part 39a	C	Fuel meter, firing monitor, calculations	X	
Heat input limit	BAAQMD condition #17154, Part 16	Y		50,024 MM BTU/calendar day (HHV), for each Turbine and HRSG, total	BAAQMD condition #17154, Part 39a	C	Fuel meter, firing monitor, calculations		X See attached 30-Day Report
Heat Input Limit	BAAQMD condition #17154, Part 17	Y		53,188,532 MM BTU/yr (HHV) for S-1, S-3, S-5, Turbines and S-2, S-4, S-6 HRSGs combined	BAAQMD condition #17154, Part 39a	C	Fuel meter, firing monitor, calculations	X	
Steam turbine cold start-up or combustor tuning	BAAQMD condition #17154, Part 24	Y		30 hours per year per turbine	BAAQMD condition #17154, Part 62	P/H	Records	X	

Delta Energy Center
Title V CEMS Semi-Annual Monitoring Report
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Table VII – B
Applicable Limits and Compliance Monitoring Requirements
S-9, Cooling Tower

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301	N		> Ringelmann 1.0 for no more than 3 minutes in any hour		N		N/A	
Opacity	SIP 6-301	Y		> Ringelmann 1.0 for no more than 3 minutes in any hour		N		N/A	
FP	BAAQMD Regulation 6-1-310	N		0.15 gr/dscf		N		N/A	
FP	SIP Regulation 6-310	Y		0.15 gr/dscf		N		N/A	
Drift Rate	BAAQMD condition #17154, Part 58	Y		0.0005%	BAAQMD condition #17154, Part 59	P	Initial source test	X	
Total Dissolved Solids	BAAQMD condition #17154, Part 58	Y		5233 ppmw (mg/l)	BAAQMD condition #17154, Part 58	P/D	Sampling and testing of cooling tower water	X	
Opacity	BAAQMD Regulation 6-303.1	N		Ringelmann 2.0 for 3 minutes in any hour		N		N/A	
Opacity	SIP Regulation 6-303.1	Y		Ringelmann 2.0 for 3 minutes in any hour		N		N/A	

Delta Energy Center
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Table VII – C
Applicable Limits and Compliance Monitoring Requirements
S-10, Fire Pump Diesel Engine

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
SO ₂	BAAQMD 9-1-301	Y		GLC of 0.5 ppm for 3 min. or 0.25 ppm for 60 min. or 0.05 ppm for 24 hours		N		N/A	
SO ₂	BAAQMD 9-1-304	Y		Sulfur Content $\leq$ 0.5% by weight		N		N/A	
Reliability Related Hours	BAAQMD 9-8-330	N	1/1/12	100 hours until 1/1/12 50 hours after 1/1/12	9-8-502 9-8-530	P/E	Totalizing meter record keeping	X	
Reliability Related Hours	BAAQMD Condition #22851, Part 1	N		34 hours per calendar year	BAAQMD Condition #22851, Part 3, 4	P/E	Totalizing meter record keeping	X	

Delta Energy Center
Title V CEMS Semi-Annual Monitoring Report
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Table VII – D
Applicable Limits and Compliance Monitoring Requirements
S-11, Natural Gas Fired Emergency Generator

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-303.1	N		< Ringelmann 2.0, except for no more than 3 minutes in any hour		N		N/A	
Opacity	SIP 6-303.1	Y		< Ringelmann 2.0, except for no more than 3 minutes in any hour		N		N/A	
FP	BAAQMD Regulation 6-1-310	N		0.15 gr/dscf		N		N/A	
FP	SIP Regulation 6-310	Y		0.15 gr/dscf		N		N/A	
SO ₂	BAAQMD Regulation 9-1-301	Y		GLC of 0.5 ppm for 3 min. or 0.25 ppm for 60 min. or 0.05 ppm for 24 hours		N		N/A	
SO ₂	BAAQMD Regulation 9-1-302	Y		300 ppm (dry)		N		N/A	
Reliability Related Hours	BAAQMD 9-8-330	N	1/1/12	100 hours until 1/1/12 50 hours after 1/1/12	9-8-502	P/E	Totalizing meter record keeping	X	
Reliability Related Hours	BAAQMD Condition #21609, Part 1	Y		100 hours per calendar year	BAAQMD Condition #22231, Part 2 and 3	P/E	Record keeping	X	

DEC 30-Day Report for RCA #202757

Reporting Period 4/1/2025 - 3/21/2026

DELTA ENERGY CENTER

1200 Arcy Ln.
Pittsburg, CA 94565-0055

February 20, 2026

Director, Enforcement and Compliance Division
Bay Area Air District
375 Beale Street, Suite 600
San Francisco, CA 94105
Attn: Title V Reports
Via email: compliance@baaqmd.gov

RE: Delta Energy Center #B2095
Major Facility Review Permit (Title V Permit)
Daily Combined Heat Input Rate Exceedance January 25, 2026
30-Day Title V Non-Compliance Report

To Whom It May Concern:

In accordance with the Major Facility Review Permit (Title V Permit) for the Delta Energy Center (DEC), this letter is intended to satisfy the 30-day follow-up reporting requirement as required by Section I.F. of the Title V Permit.

Reportable Compliance Activity (RCA) No. 202757 was submitted to the District on January 29, 2026. The Facility submitted a 10-Day Title V Notification Report to the District on February 4, 2026.

Event

On January 25, 2026 at 23:59 the CEMS DAHS indicated the Combined Daily Heat Input Rate for Unit 3 at 50,035 MM Btu, exceeding the allowable limit of 50,024 MM Btu by 0.022%.

Corrective Action

This event ended with the start of the new calendar day.

Compliance Status

The Facility returned to compliance on January 26, 2026 at 00:00.

Investigation

On the day of the event, DEC was dispatched to run all three units at maximum output for most of the day in cold temperatures (limited by the Hourly Fuel Consumption Limits). These uncommon conditions required the CRO to closely monitor the hourly heat input limit for all units.

DEC's investigation determined that the Primary Root Cause for this event was that the Control Room Operator (CRO) missed the alarm indicating that Unit 3 was approaching the Daily Heat Input Limit.

Preventative Actions

The following corrective and preventative actions were identified during the investigation:

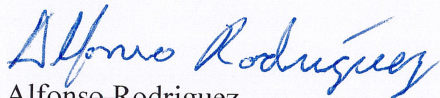
- Conduct refresher training on Hourly and Daily Mass Emissions Limits.
- Create a Priority 2 Alarm in the DCS when the Daily Combined Heat Input is > 96% of the Daily Limit,
- Evaluate adding additional protection including auto reductions to minimum load, or automatic tripping of the unit if necessary.

Certification

As a Responsible Official, I certify that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

If you have any questions or require additional information, please contact Diana West at (925) 252-2069.

Sincerely,



Alfonso Rodriguez
Responsible Official and Plant Manager
Delta Energy Center, LLC

Cc: John Heiser – California Energy Commission
EHSWalnutCreek@calpine.com
CICS INC104417

via email attachment
via email attachment

DS
JG

Initial
LG