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STATE OF CALIFORNIA

**Energy Resources Conservation
and Development Commission**

In the Matter of:

BOTTLE ROCK POWER, LLC

**BOTTLE ROCK GEOTHERMAL
POWER PLANT**

Docket No. 79-AFC-4C

Docket No. 12-CAI-04

**BOTTLE ROCK POWER, LLC'S
INITIAL COMMENTS ON STAFF ASSESSMENT**

October 2, 2013

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BOTTLE ROCK POWER, LLC'S INITIAL COMMENTS ON STAFF ASSESSMENT

Bottle Rock Power, LLC ("BRP") hereby submits these initial comments on the 2013 Staff Assessment for the Bottle Rock Geothermal Power Plant Petition to Amend ("Staff Assessment"), filed on September 6, 2013. Staff also filed a Compilation of Conditions of Certification for Bottle Rock Project ("Compilation of Conditions") on September 6, 2013. In a memorandum dated September 12, 2013, Compliance Project Manager Camille Remy-Obad provided notice that the deadline to provide comments on the Staff Assessment is October 2, 2013. On September 13, 2013, Ms. Remy-Obad provided notice of a Public Workshop on BRP's Petition to Amend scheduled for October 4, 2013.

BRP has a number of questions and concerns with the Staff Assessment and the Compilation of Conditions. Of particular note is Staff proposed amendments to BRP's Conditions of Certification, which differ significantly from the amendments sought in BRP's Petition to Amend. BRP also has questions and concerns regarding Staff's approach to

estimating the cost of decommissioning and the related proposed conditions requiring acquisition of a decommissioning bond.

To that end, BRP anticipates that some of its questions or concerns may be addressed at the October 4th Public Workshop. Without waiving its ability to object to or comment on any aspects of the Staff Assessment and proposed Conditions of Certification, or to provide comments on the Compilation of Conditions, in the interest of focusing comments in response to the information exchanged at the Public Workshop and consistent with standard procedures, BRP intends to submit comprehensive comments on the Staff Assessment and Compilation of Conditions of Certification by no later than October 11, 2013.

Dated: October 2, 2013

By: 

Kristen T. Castaños
Attorneys for Bottle Rock Power, LLC