

## DOCKETED

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July 28, 2014

Joe Douglas  
Compliance Project Manager  
07-AFC-5C  
California Energy Commission  
1516 Ninth Street, MS-2000  
Sacramento, CA 95814

RE: IVANPAH SOLAR ELECTRIC GENERATING SYSTEM (07-AFC-5C)  
Petition for Amendment No. 4

Dear Mr. Douglas:

On behalf of Solar Partners I, II, and VIII LLC (“Solar Partners”), we thank you for the opportunity to review the CEC Staff Analysis of the Petition to Amend the Final Decision for the Ivanpah Solar Electric Generating System (“Ivanpah”). The staff analysis, published June 27, 2014, recommends approval of our request for an increase in allowable annual fuel use for the natural gas fired boilers at Ivanpah to allow efficient system operation and to maximize solar electricity generation. We support the staff’s assessment and recommendation for approval of the Petition to Amend.

Should you have questions, please do not hesitate to contact me at (916) 447-2166.

Sincerely,



Jeffery D. Harris  
Ellison, Schneider & Harris L.L.P.  
Attorneys for Solar Partners I, II, and VIII LLC