

## DOCKETED

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<b>Project Title:</b>	Ivanpah Solar Electric Generating System (Compliance)
<b>TN #:</b>	203426
<b>Document Title:</b>	Ivanpah Solar Electric Generating System Addendum to Heliostat Positioning Plan
<b>Description:</b>	N/A
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<b>Organization:</b>	Ellison, Schneider & Harris L.L.P.
<b>Submitter Role:</b>	Applicant Representative
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**Ivanpah Solar Electric Generating System  
California Energy Commission (07-AFC-5C)  
Bureau of Land Management  
(CACA-48668, 49502, 49503, and 49504)  
Condition of Certification TRANS-3**

**Heliostat Positioning Plan (Rev 1)**

**Addendum to Plan**

**Submitted  
December 10, 2014**

**energyservices an NRG service  
On behalf of Solar Partners I, II, and VIII LLC**

December 8, 2014

Joseph Douglas, Compliance Project Manager  
California Energy Commission  
Siting, Transportation and Environmental Protection Division  
1516 9<sup>th</sup> Street  
Sacramento, CA 95814

Mike Ahrens  
Authorized Officer  
BLM, Needles Field Office  
1303 U.S. Hwy 95 S.  
Needles, CA 92363

**RE: Revision to the Monitoring in the Heliostat Positioning Plan**

Dear Mr. Douglas and Mr. Ahrens:

The Ivanpah Solar Electric Generation System (ISEGS) is providing this letter to the California Energy Commission (CEC) and the Bureau of Land Management (BLM) in compliance with Condition of Certification (CoC) TRANS-3 and the Monitoring Section of the approved Heliostat Positioning Plan (HPP) (HPP Section 6.0). As per the attached correspondence from your office the CEC Compliance Project Manager (CPM) approved the Final HPP on December 10, 2013. The BLM provided approval for the plan on June 13, 2013.

As required TRANS-3, the HPP Section 6.0 provides a monitoring plan that a) obtain field measurements in response to legitimate complaints; b) verify that the Heliostat Positioning Plan would avoid potential for human health and safety hazards including temporary or permanent blindness at locations of observers; and c) provide requirements and procedures to document, investigate and resolve legitimate complaints regarding glare. Furthermore, TRANS-3 requires that the monitoring plan should be coordinated with the FAA, U.S. Department of the Navy, CalTrans, CHP, and Clark County Department of Aviation in relation to the proposed Southern Nevada Supplemental Airport and be updated on an annual basis for the first 5 years, and at 2-year intervals thereafter for the life of the project. This letter provides an annual update to the monitoring plan as required by TRANS-3.

As part of the monitoring conducted this year at the facility, Dr. Clifford Ho of Sandia National Laboratories visited the site on April 24<sup>th</sup> and 25<sup>th</sup> to obtain ground-based measurements. The plan required that should the threshold for "potential after image" as described in the HPP (Section 2.1.1 and 2.2 and Figure 2-1) be exceeded at a ground-based location, then BLM and CEC would be consulted to determine whether the glint or glare constitutes a potential hazard. As per the report submitted and docketed with the CEC on July 17, 2014 no ground-based readings obtained exceeded this threshold. In addition, the report concluded that drive by surveys did not reveal any ocular hazards and glare from an occasional "rogue" heliostat was not perceived to be a significant ocular hazard.

Section 6.1.1 of the HPP required the installation of ground-based cameras to monitor for potential glint and glare events to occur to motorists and other ground-based receptors. Since there is no potential for ocular hazard to ground-based observers, the requirement for cameras should be removed from the HPP. This letter requests the modification of the HPP monitoring section to remove the requirement for ground-based cameras based on the findings of investigations by Sandia National Laboratories that no significant ocular hazard exists for ground-based observers.

Please note that this request is specific to the annual monitoring update as required by Section 6 of the monitoring plan per TRANS-3. ISEGS will provide a HPP report update in the Annual Compliance Report. ISEGS appreciates the continuing cooperation of the Commission staff. Please feel free to contact me directly should you have any questions.

Sincerely,  
**mitch.samuelian@nrgenergy.com**

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