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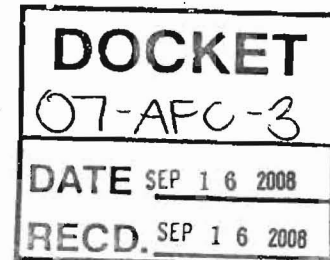
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September 16, 2008

Caryn Holmes, Esq.
Staff Counsel
California Energy Commission
1516 9th Street, MS14
Sacramento, CA 95814-5512

File No. 030137-0012



Re: CPV Sentinel Energy Project - Docket No. 07-AFC-03

Dear Caryn:

I am following up on a brief discussion that occurred during the Preliminary Staff Assessment Workshop for the CPV Sentinel Energy Project on September 3, 2008 regarding the CEC's request that the applicant merge the parcels that comprise the project site into a single legal lot.

The CPV Sentinel Energy Project site consists of three separate Assessor's Parcel Numbers (APNs) (668-130-005, 668-130-007, and 668-140-001). As indicated in the Application for Certification, Applicant had anticipated merging the parcels by obtaining a Certificate of Parcel Merger with the Riverside County Planning Department. The Preliminary Staff Assessment concluded that the proposed CPV Sentinel Project would be in compliance with the Subdivision Map Act after recording the merger with the County Recorder.

Applicant subsequently has learned that, due to complicated ownership structures, a parcel merger poses a number of difficulties including complex tax implications. Applicant would like to maintain separate parcels but record a lot tie agreement, or a Covenant and Agreement To Hold Property as One Parcel, among the parcels. Such agreements, which typically are executed for the purpose of creating a single building site, require the parcel owners to covenant with the County that the real property at issue shall be held as one parcel and no portion shall be sold separately. The covenant runs with the land and is binding upon the current owners, future owners, encumbrances, successors, heirs or assignees, and continues in effect until released by the authority of the County upon request and evidence that the agreement is no longer required by law.

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As a practical matter, all parcels already are tied together by a common ground lease between Applicant and the owners of the parcels. Applicant believes that a lot tie agreement as described above would accomplish the goal of a parcel merger and satisfy the Commission's land use requirements. Thank you for your attention to this matter.

Best regards,


Michael Carroll
(PER)

Michael J. Carroll
of LATHAM & WATKINS LLP

cc: John Kessler, CEC
Mark Turner, CPV
Dale Shileikis, URS
Kathy Rushmore, URS

**STATE OF CALIFORNIA
ENERGY RESOURCES
CONSERVATION AND DEVELOPMENT COMMISSION**


In the Matter of:) Docket No. 07-AFC-3
)
Application for Certification,) **ELECTRONIC PROOF OF SERVICE**
for the CPV SENTINEL ENERGY PROJECT) **LIST**
)
) (July 24, 2008]
)
_____)

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DOCKET UNIT

CALIFORNIA ENERGY COMMISSION

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1516 Ninth Street, MS-15
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 Transmission via electronic mail addressed to the following:

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CPV SENTINEL ENERGY PROJECT
CEC Docket No. 07-AFC-3

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CPV SENTINEL ENERGY PROJECT
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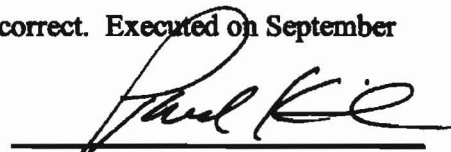
DECLARATION OF SERVICE

I, Paul Kihm, declare that on September 16, 2008, I deposited a copy of the attached:

LETTER FROM MICHAEL CARROLL TO CARYN HOLMES

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I declare under penalty of perjury that the foregoing is true and correct. Executed on September 16, 2008, at Costa Mesa, California.



Paul Kihm