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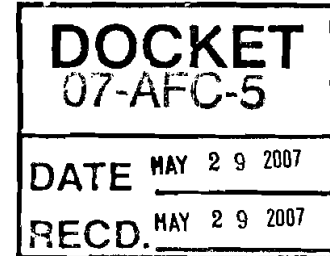
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May 29, 2008

Commissioner Jeffrey Byron, Presiding Member
Commissioner James Boyd, Associate Member
Ivanpah Solar Electric Generating System (07-AFC-5)
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814



Re: Ivanpah Solar Electric Generating System (07-AFC-5): Notice Pursuant to 20
CCR 1716(f): Data Requests 117 through 151

Dear Commissioners Byron and Boyd:

Solar Partners I, LLC, Solar Partners II, LLC, Solar Partners IV, LLC and Solar Partners VIII, LLC (the "Applicant") hereby files this notice as required by Section 1716(f) of the Commission's regulations regarding the need for additional time and the basis for objections to certain Data Requests promulgated by Staff received by the Applicant on May 9, 2008.

Applicant may need additional time to respond to certain Data Requests. Specifically, Applicant estimates that it may need an additional 30 days for the following requests: Data Request 124, 139, and 140. Applicant estimates it may need an additional 60 days for Data Request 125. Further, as described below, Applicant has objections to certain Data Requests. Without waiving any of these objections, Applicant reserves the right to provide and will endeavor to provide responses, in whole or in part, to some or all of these Data Requests. Moreover, Applicant believes that discussions with CEC and BLM Staff may make these objections irrelevant if we are able to reach an understanding and agreement regarding the nature and scope of the information requested.

The background to Data Requests 121-123 correctly states that BrightSource Energy Inc., the parent company of the Applicant, has signed a contract with PG&E to purchase power from future projects, including Broadwell Lake. The Broadwell Lake and Siberia projects described in the Data Requests are not owned by Applicant and, should they progress, they will each be the subject of individual NEPA-CEQA review. In answer to Data Requests 121-123, Applicant can provide publicly available information; however, to the extent these Data Requests seek information that is a trade secret or confidential business information, Applicant objects as such information is not owned by Applicant and release of such information could place its parent company, BrightSource Energy, Inc., at a competitive disadvantage. To the extent these requests seek information that is proprietary, confidential, privileged, and otherwise protected from production, Applicant objects to these aspects of the requests. Moreover, the projects described in these Data Requests are separate projects in furtherance of Applicant's parent company's efforts to satisfy existing contractual commitments and to certify additional renewable resources

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for sale to California's load-serving entities in satisfaction of their renewable portfolio standard ("RPS") goals, not simply as alternatives to Ivanpah SEGS. Thus, Applicant further objects to these requests as burdensome.

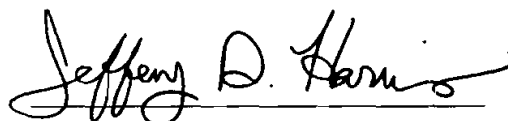
Data Requests 126-129 seek information on another project by another applicant that will be processed in another NEPA-CEQA compliant process. Specifically, the transmission owner's, Southern California Edison ("SCE"), planned replacements for and upgrades to the Boulder Dam-San Bernardino 115-kV transmission line are not required for the Ivanpah SEGS project and, as such, are not part of the Ivanpah SEGS project description. Since the planned SCE project is not part of the Ivanpah SEGS project, the Applicant does not control the scope of work that SCE will perform (and it would be inappropriate to speculate on the nature and scope of another's project). Of course, SCE's project will be subject to its own NEPA and CEQA-compliant environmental review and permitting processes, where BLM will be the lead agency for the NEPA review. For these reasons, Applicant objects to these requests as irrelevant to any decision the Commission must make in this case and as burdensome because the information requested is already being requested of SCE by the BLM for the upgrade project. Nevertheless, Applicant will work with the BLM, the Commission, and SCE to see what information may be available.

With respect to Data Request 132, the Applicant understands that BLM has agreed to accept an updated Plan of Development instead of a revised SF 299. Based on this understanding, Applicant has no objection to this request.

Applicant appreciates the good-faith efforts of Staff and has, as its objective for the workshop, the complete and satisfactory resolution of all issues.

Thank you for your time and consideration.

Sincerely,



Ellison, Schneider & Harris L.L.P.

Jeffery D. Harris

Jedediah J. Gibson

Attorneys for Solar Partners I, LLC; Solar Partners II, LLC; Solar Partners IV, LLC; and Solar Partners VIII, LLC

JDH/djw

Enclosure

cc: Che McFarlin
Paul Kramer
Service List (07-AFC-5)

STATE OF CALIFORNIA

Energy Resources Conservation
and Development Commission

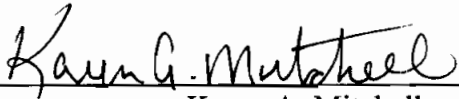
Application for Certification for the IVANPAH)
SOLAR ELECTRIC GENERATING SYSTEM)
_____)

Docket No. 07-AFC-5

PROOF OF SERVICE

I, Karen A. Mitchell, declare that on May 29, 2008, I served the attached letter to
Commissioners Byron and Boyd via electronic mail to all parties on the attached service list.

I declare under the penalty of perjury that the foregoing is true and correct.



Karen A. Mitchell

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07-AFC-5

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