

Memorandum

Date: May 18, 2009
 Telephone: (916) 654-4679

To: Commissioner Jeffrey Byron, Presiding Member
 Commissioner James D. Boyd, Associate Member

From: **California Energy Commission** – John Kessler, Project Manager
 1516 Ninth Street
 Sacramento, CA 95814-5512

DOCKET
07-AFC-5

DATE	<u>05/18/09</u>
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RECD.	<u>05/18/09</u>
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Subject: **STATUS REPORT #9**
IVANPAH SOLAR ELECTRIC GENERATING SYSTEM (07-AFC-5)

This status report is prepared to comply with the next-scheduled report due by May 22, 2009 as well as serve to provide updated information for the Committee's May 18, 2009 Scheduling Conference. Staff appreciates the Committee taking time to consider and discuss issues affecting the project schedule.

Ivanpah Solar Electric Generating System (ISEGS) Project continues to progress through its review by Bureau of Land Management (BLM), Energy Commission (CEC) staff, and responsible agencies, including California Department of Fish and Game (CDFG) and U.S. Fish and Wildlife Service (FWS). The ISEGS Project schedule has been hampered by a series of changes in the project layout and proposed construction approach, resulting in the additional time needed by the applicant to prepare a number of studies and plans focusing on site characterization, drainage and biological issues. The applicant's completion and submittal of these key elements are necessary for the BLM and Energy Commission staff to complete important sections of the Final Staff Assessment/Draft Environmental Impact Statement (FSA/DEIS). The information is necessary to adequately describe the proposed project, prepare permit applications, assess impacts and develop mitigation measures.

The complexity of this large project with a site on a sloping alluvial fan below a mountain range has required several rounds of BLM/Energy Commission data requests and interaction with the applicant. The hydrological analyses, grading and drainage plans currently under development are necessary to define the physical layout of the project and the extent of ground disturbance with respect to site grading and drainage features. The applicant's plans need to demonstrate that underlying assumptions and design criteria are reasonable so that additional significant changes to the project description will not occur. These plans

will enable BLM and Energy Commission staff to assess project impacts to Soil and Water Resources and to identify impact avoidance and mitigation measures.

The Preliminary Staff Assessment (PSA) published on December 9, 2008 served to identify the additional information/agency coordination needs, which were discussed and clarified during the PSA Workshop conducted on January 9, 2009. As a follow-up to the workshop, on January 15, 2009 the BLM and Energy Commission staff provided the applicant with a list of, and a draft schedule for, the needed deliverables. The deliverables have required substantial planning and preparation work by the applicant because previous site plans were not supported by proper site characterization, hydrologic and hydraulic analyses accounting for the project's impacts to soil and stormwater runoff, and demonstrating conformance with applicable local design criteria. Staff has updated the status of these deliverables with each subsequent Status Report (#s 6 – 9).

BLM and Energy Commission staff will continue to coordinate the activities and information needs of our own and other responsible agencies in support of the right-of-way and licensing processes. The applicant has dedicated significant resources to preparing its grading and drainage plans, and BLM and Energy Commission staff are encouraged by ongoing progress.

MAJOR REVISIONS TO THE PROPOSED PROJECT SINCE FILING THE AFC

The major changes to the proposed project have been primarily attributable to the mirror configurations of the heliostats and management of stormwater that currently is conveyed via approximately 2000 ephemeral drainages throughout the ISEGS site, located on an alluvial fan at the base of the Clark Mountain Range. The stormwater flows generated within the Clark Mountains and passing through the site are significant and present unique challenges in project design. BLM staff's concern is based on many years of observing stormwater runoff patterns in this area. Major site alterations, as would result from ISEGS, have the potential to modify stormwater drainage patterns and flowrates, and result in severe erosion impacts which would adversely affect the project site, Ivanpah Dry Lake bed and surrounding region. CEC staff concurs with BLM on the importance of proper site characterization to establish underlying assumptions, and a design basis to account for changes in alignment and channel configuration of the drainages resulting from stormwater flows during the entire life of the facility.. The following table summarizes the applicant's changes to the original proposed project as a result of these challenges.

Major Revisions to the Proposed Project

Date	Reference Document	Project Area	Number of Heliostats	Other Revisions to Proposed Project
10-31-07	AFC Section 2.1, page 2-2	3,400	272,000	AFC original proposal: single-hung, 7-square meter mirrors on each heliostat;
Revision 1				
5-9-08	Data Response Set 1D (Site Optimization Plan, page 4)	3,700	214,000	<ol style="list-style-type: none"> 1. Reduced the number of heliostats from 272, 000 in the single-hung to 214,000 in the double-hung mirror configuration; 2. Increased the heliostat mirror surface area from 7 to 14-square meters; 3. Moved the project boundaries out an additional 250 feet on the perimeters within the surveyed areas to increase the spacing between heliostats;
Revision 2				
6-10-08	Data Response 2A	4,065	214,000	<ol style="list-style-type: none"> 1. Revised stormwater drainage plans from pass-through to include large detention ponds and conveyance features; 2. The addition of stormwater detention ponds resulted in an increased project area from 3,700 to 4,065 acres; 3. Identified high level of grading and ground disturbance; 4. Revised plans were not supported with underlying site characterization assumptions and stormwater calculations; 5. CEC and BLM requested supporting information from BrightSource;
Revision 3				
3-25-09	Preliminary Revisions to	4,111	280,000	1. Revised stormwater drainage

	Site Plans		(Clarified by CH2MHill on 5-15-09 to be 214,000, even though PPA would allow up to 270,000)	<p>plans again, eliminating large detention basins and conveyance features, and relying on existing ephemeral drainages;</p> <p>2. Proposed Low Impact Design (LID) approach to minimize ground disturbance and to retain as much vegetation as possible;</p> <p>3. Staff and BLM generally support the LID approach if the applicant's studies (yet to be submitted) demonstrate ISEGS can withstand erosional stormwater forces that:</p> <ul style="list-style-type: none"> a) might affect site operations; b) result in transportation of damaged materials (heliostats and their components) outside of the site boundary; and/or c) change stormwater erosion and deposition outside of the site boundary. <p>4. Based on review of initial draft plans, CEC and BLM are concerned with the applicant's underlying assumptions that do not appear to address effects to stormwater runoff from soil compaction, application of soil binders, and the fate of vegetation after trimming and long-term exposure to shading;</p>
5-13-09 thru 5-18-09	Updated Revisions to Site and Stormwater Plans	4,065	214,000	BLM and CEC staff have not had a chance to review and consider comments on these plans

APPLICANT'S APPROACH TO PREPARING DRAFT DOCUMENTS

The Applicant is choosing to revise its plans and studies without first obtaining agreement with BLM and CEC staff on the underlying assumptions and design criteria used for those studies. While the applicant recognizes that there is inherent risk in this approach that it may have to revise its plans again should staff still have outstanding and significant concerns, the applicant is willing to assume this risk in the interest of expediting its schedule.

UPDATE TO THE STATUS OF OUTSTANDING INFORMATION NEEDED FOR PREPARATION OF THE FSA/DEIS

The following is a summary of the status of information needed for preparation of the FSA/DEIS. For the draft documents received from the applicant as of May 11, 2009, BLM and Energy Commission staff have reviewed these and provided comments to the applicant. Their completion is pending revision by the applicant. The revisions are necessary before the BLM and Energy Commission staff can prepare the FSA/DEIS. The applicant's draft plans need to be prepared to a quality that adequately describes the proposed project and supports the assessment of potential impacts and identification of necessary mitigation measures to avoid or lessen impacts to a level below significant. While the number of activities may seem limited, the volume of information and analysis generated by the applicant within these activities is substantial. The information developed under the grading and drainage plans is pivotal to the applicant's ability to progress to preparation of subsequent plans and permit applications, many of which can be developed concurrently. Specifically, the grading and drainage plans explain the level of ground disturbance to soil, vegetation and the ephemeral washes, and propose the drainage facilities needed to manage stormwater according to the San Bernardino and Clark County's design criterions. The status of outstanding information is discussed as follows:

Deliverable	Status	Activities and Issues
<p><u>Closure, Revegetation and Rehabilitation Plan</u></p> <p>This plan addresses temporary and permanent closure of ISEGS and the necessary stabilization/restoration of the site.</p>	Under Revision	<ol style="list-style-type: none"> 1. Applicant submitted to BLM its initial draft on January 28, 2009; 2. BLM and Energy Commission staff provided extensive comments (18 pages) on March 21, 2009; 3. The draft plan primarily listed options for rehabilitating the site after project closure, rather than addressing what the applicant proposed. 4. Plans need to demonstrate sufficient protection and restoration of soil and vegetation resources, as well as establishment of a bond to assure funds are available from applicant at

Deliverable	Status	Activities and Issues
		the time of project closure.
<p><u>Desert Tortoise Translocation and Relocation Plan</u></p> <p>This plan addresses the temporary and permanent relocation of an estimated 25 tortoises from the ISEGS site to non-project sites.</p>	Under Revision	<ol style="list-style-type: none"> 1. The applicant filed its draft Desert Tortoise Translocation and Relocation Plan on March 19, 2009. 2. Staff representatives of BLM, USFWS, CDFG, and the Energy Commission provided comments to the draft plan on April 28, 2009. 3. The revised plan will need to provide considerably more detail on: habitat quality and current tortoise densities at proposed translocation site; site clearance survey methods; permitting and installation of temporary and permanent fencing at translocation site; disease testing; timing of translocation; monitoring, reporting, and use of transmitters.
<p><u>Hydrology Studies</u></p> <p>The applicant is required to prepare a hydrological site characterization to assess the site infiltration and runoff characteristics, and estimate the runoff that develops upstream of the site as well as within the project boundaries. This information is essential to prepare an initial civil design for the project.</p>	In Progress	<p>The applicant's submittals addressing stormwater analyses in 2009 include:</p> <ol style="list-style-type: none"> 1. Draft scopes of work for hydrogeologic and hydraulic analysis (1-27-09); 2. Preliminary Analysis of Precipitation Infiltration into Soil (2-15-09); 3. Technical Memo 1 - Geologic, Soil, and Watershed Characteristics Relating to Stormwater Management (3-6-09); 4. Technical Memo 2 - Preliminary Flo-2D Modeling (Routing of Stormwater) for Pre-Project Conditions (3-6-09); 5. Technical Memo 3 - Preliminary Analysis of Infiltration Tests (3-6-09); 6. Technical Memo 4 - Revised Preliminary Analysis of Infiltration (3-6-09); 7. Technical Memo 5 - Preliminary Estimates of the Design Storm Discharges (3-6-09); <p>Staff and BLM provided initial feedback</p>

Deliverable	Status	Activities and Issues
		to these submittals via subsequent teleconferences or meetings on February 17, March 10, 17 and 25, 2009.
<p data-bbox="186 457 495 636"><u>Supplemental Project Description and Appendices (Civil Engineering Design Drawings)</u></p> <p data-bbox="186 674 584 999">These plans explain the level of ground disturbance to soil, vegetation and the ephemeral washes, and propose the drainage facilities needed to manage stormwater according to the San Bernardino and Clark Counties design criterions.</p>	Under Revision	<ol style="list-style-type: none"> <li data-bbox="852 457 1404 863">1. On March 25, 2009, the applicant presented a significantly different concept for its construction, grading and drainage plans, by proposing Low Impact Design principles as indicated in a Supplemental Project Description Report and revised civil engineering design drawings. Revised drawings were again submitted on April 23, 2009. <li data-bbox="852 877 1421 1451">2. BLM and CEC staff submitted detailed questions and comments to the applicant on April 8, 2009 requesting written responses to comments and resolution of questions on the underlying assumptions for the analyses. The applicant has indicated that they are confident of their approach on the stormwater analysis will proceed with the revised studies and final revised project description before resolving outstanding questions on assumptions used in the calculations. <li data-bbox="852 1465 1429 1661">3. The revised LID approach seeks to minimize grading and leave most vegetation in-place, but requires taller vegetation to be trimmed to no higher than 12 – 16”. <li data-bbox="852 1675 1412 1871">4. Stormwater would move through the site according to its natural drainage patterns within the ephemeral washes. Applicant would install pylons located within drainages

Deliverable	Status	Activities and Issues
		<p>deeper into the soil to support heliostats to withstand stormwater flows.</p> <ol style="list-style-type: none"> <li data-bbox="846 359 1446 730">5. The use of this revised low-impact development plan eliminates previously contemplated drainage control structures and allows applicant to fill in additional space with heliostats, increasing the total number from approximately 214,000 previously to 280,000 as currently proposed. <li data-bbox="846 737 1446 982">6. The applicant is also exploring use of equipment that can be modified for site access options that would be used during construction and operations that will minimize site disturbance. <li data-bbox="846 989 1446 1318">7. While staff is encouraged by the revised site preparation approach overall, it is necessary for staff to evaluate the new project description and for the applicant to demonstrate that multiple assumptions in the Low Impact Design are reasonably achievable. <li data-bbox="846 1325 1446 1738">8. These include assumptions that compaction and vegetation changes will not significantly alter stormwater runoff, and that the heliostat field construction can be accomplished without significantly removing or damaging vegetation. Further, applicant needs to verify vegetation losses due to shading affect from heliostats will occur.

Deliverable	Status	Activities and Issues
<p><u>Biological Resources Mitigation Proposal</u></p> <p>This is the applicant's proposal to satisfy both federal and state requirements for avoiding or reducing Biological Resource impacts of the project to below significant.</p>	<p>Ongoing discussions with CDFG and the Resources Agency</p>	<ol style="list-style-type: none"> 1. Staff of BLM, USFWS, CDFG and Energy Commission are assessing the mitigation needed to address the loss of habitat for desert tortoise, loss of special status plants and other sensitive species, and impacts to state waters and potentially waters of the US. 2. Staff understands that the applicant is holding periodic meetings with CDFG headquarters and the Resources Agency to discuss these same issues. 3. BLM and Energy Commission staff are proceeding with development of mitigation measures even though at this time we have not yet found a way to integrate BLM mitigation requirements with CDFG's California Endangered Species mitigation requirements for desert tortoise.
<p><u>Biological Assessment (BA)</u></p> <p>The BA is the document that USFWS will refer to in preparing its Biological Opinion.</p>	<p>In Progress</p>	<ol style="list-style-type: none"> 1. The applicant needs to revise the draft BA to address BLM's comments, incorporate the revised project description when it is finalized, and include a revised Desert Tortoise Translocation Plan. 2. Draft BA also needs to be revised by applicant to reflect the most recent revisions to the project description including details on construction methodology. 3. Staff understands this information, which is needed to complete the FSA/DEIS, is still under development by the applicant. 4. Once filed by the applicant, the BA would be finalized by BLM and submitted to USFWS close to the time the FSA/DEIS is circulated for public review and comment.

Deliverable	Status	Activities and Issues
<u>Incidental Take Permit Application</u> This permit issued by CDFG on past projects, will be included in the CEC's license. It specifies how the project's effects to state-listed species will be fully mitigated.	In Progress	1. Staff understands that the applicant has compiled much of the information needed for submittal of this permit application to the Energy Commission and CDFG, and will also incorporate the Desert Tortoise Translocation Plan into this application. 2. This information is needed to complete the FSA/DEIS.
<u>Streambed Alteration Agreement Application</u> This permit issued by CDFG on past projects, will be included in the CEC's license. It specifies how the ephemeral washes will be protected to minimize disturbance to soil, vegetation and water resources.	In Progress	1. Staff understands the applicant has developed much of the information needed for submittal of this application to CDFG and the Energy Commission. 2. Its completion and filing is subject to completion of ISEGS site construction, grading and drainage plans.
<u>Drainage, Erosion and Sediment Control Plan (DESCP) and the Storm Water Pollution Prevention Plan (SWPPP)</u>	Revised draft submitted 5/15/09	1. After the applicant finalizes their stormwater analyses they will update their Drainage, Erosion and Sediment Control Plan and the Storm Water Pollution Prevention Plan to demonstrate they have identified and propose implementation of adequate Best Management Practices (BMPs). 2. These plans for implementing, monitoring and maintaining BMPs during both construction and operations will support staff in completing the analysis of potential impacts from wind and water erosion and for considering the potential for degradation of water quality.
<u>Army Corps of Engineers (ACOE) Jurisdictional Determination and Permit</u>	In Progress	1. The applicant has advised staff as of 5/18/09 that the ACOE has recommended and U.S. Environmental Protection Agency has

Deliverable	Status	Activities and Issues
		<p>confirmed that ISEGS will not affect waters of the U.S..</p> <p>2. The applicant will be providing staff with documentation of this determination.</p>
<p><u>Groundwater Study</u></p>	<p>In Progress</p>	<p>The applicant in developing this study and working with staff and BLM to evaluate the potential for migration of brackish groundwater westward towards the existing and proposed project wells due to existing and proposed pumping by ISEGS.</p>
<p><u>Lahontan RWQCB Permits</u></p> <p>These are permits that would normally be issued by the RWQCB but for the CEC's authority to include the requirements under the license. The permit requirements would specify how existing beneficial uses would be maintained for groundwater and surface waters of the state, and the project safeguards needed to avoid project impacts to soil and water resources of the state.</p>	<p>In Progress</p>	<ol style="list-style-type: none"> 1. Staff and BLM understand that conditions associated with a number of permits are required from the Lahontan RWQCB so that they may be integrated with the Energy Commission's Final Decision. 2. These permits are related to the treatment and discharge of sanitary wastewater for landscape irrigation, the dredge and fill within onsite ephemeral streams that are considered waters of the state, and management of storm water during construction and operations. 3. Staff is encouraging the applicant to coordinate its plans with the Lahontan RWQCB as soon as possible so that these permit requirements can be integrated with the Energy Commission's Conditions of Certification in the FSA/DEIS.
<p><u>Health and Safety Plan</u></p>	<p>In Progress</p>	<p>Staff understands that the applicant is working to complete the draft Health and Safety Plan for both the construction and operational phases of the project in order to support BLM's analysis that is necessary for the DEIS.</p>

SCHEDULE

The key milestone that triggers when the clock can begin for all subsequent schedule activities is the applicant providing all information necessary to adequately describe the proposed project, address project ground disturbance and stormwater drainage effects and site plans, and propose Biological Resources mitigation required to support BLM and CEC staff in preparing the FSA/DEIS. Staff does not have firm information as to when all studies and plans necessary for preparing the FSA/DEIS will be available, and cannot presume that all of the plans will be considered final. While the schedule provided by staff in our last Status Report 8 has not changed, it is included herein for convenience.

BLM and CEC staff continue to work towards resolution of issues, and to assure appropriate quality of our analysis for the Staff Assessment and Environmental Impact Statement. Staff realizes that it is not in either of our agency's or the applicant's interest to prepare an analysis that could be found deficient and could lead to further delays. At the same time, we all appreciate that solar development is key to implementing our energy and climate change policies while assuring responsible environmental stewardship.

Comparison of the Revised Committee Schedule as of 10/29/08 and Currently

Event	Revised Committee Schedule (10/29/08)	Committee Schedule Under Current Conditions
Parties file Status Reports	December 5, 2008 & every 6 weeks thereafter	December 5, 2008
Staff publishes Preliminary Staff Assessment	December 5, 2009	December 9, 2009
Staff conducts PSA workshops	Early January 2009	January 9, 2009
<u>Applicant completes hydrological/hydraulic analyses so that project description can be finalized, and submits reports or revisions as described above</u>	Not included	To be Determined (TBD)
Local, State and federal Agency final comments and determinations, including air district's final DOC filed	December 30, 2008	TBD + 15 to 30 days
<u>BLM and Staff substantially complete FSA/DEIS</u>		TBD + 45 days
<u>BLM obtains Headquarters approval of Notice of Availability of DEIS (45 – 60 days following substantial completion of DEIS)</u>		TBD + 90 to 105 days
BLM files Notice of Availability (NOA) of DEIS	March 3, 2009	TBD + 90 to 105 days
<u>Staff and BLM file FSA/DEIS</u> , and BLM issues Biological Assessment (starts 135-day clock for receiving Biological Opinion)	March 3, 2009	TBD + 90 to 105 days
Prehearing Conference (15 days following filing of FSA/DEIS) (Staff recommends 15 – 30 days to prepare for hearings considering the number of interveners)	March 18, 2009	TBD + 105 to 145 days
Evidentiary Hearings (15 -20 days following Prehearing Conference)	April 2, 2009	TBD + 120 to 165 days
Applicant completes Ivanpah 2 and 3 90% grading plans		TBD + 120 to 165 days
<u>Presiding Member's Proposed Decision (PMPD) issued for 30-day comment period (8 weeks after Evidentiary Hearings)</u> (If the Committee were to agree that the PMPD should be issued after BLM and Staff substantially complete the FEIS, the PMPD could be issued approximately 2 months later than previously scheduled. This assumes that a draft PMPD could be updated with the FEIS information in about 1 month. Please see staff's comments regarding considerations for the schedule of the PMPD on pages 6 and 7.)	May 28, 2009	TBD + 176 to 221 days (or issue PMPD at TBD + 240 to 255 days which would be 5 to 5.5 months following FSA/DEIS publication)

<u>BLM's 90-Day DEIS comment period ends</u>	June 1, 2009	TBD + 180 to 195 days
Federal Biological Opinion issued	June 17, 2009 or soon thereafter	TBD + 225 to 240 days
PMPD Comment Hearing (Approx. 25 days after PMPD issued)	June 29, 2009	TBD + 201 to 246 days
<u>BLM and Staff substantially complete the FEIS and Recommended Changes to PMPD</u>		TBD + 210 to 225 days
Revised PMPD issued for 15-day review period (35 days after PMPD issued)	July 9, 2009	TBD + 211 to 256 days
<u>Energy Commission Decision</u> adoption hearing (as FEIS approaches publication) (If the Committee were to issue the PMPD after BLM and Staff substantially complete the FEIS, the Energy Commission adoption hearing would occur approximately 2 months later than previously scheduled and at about the same time as BLM's Record of Decision, without extending the overall schedule.)	August – September 2009	TBD + 240 to 286 days (or consider Energy Commission Decision at TBD + 300 to 315 days which would be about 7 months following FSA/DEIS publication)
<u>BLM obtains Headquarters approval of Notice of Availability of FEIS (45 – 60 days following substantial completion of FEIS)</u>		TBD + 255 to 285 days
BLM issues NOA of FEIS	October 2, 2009	TBD + 255 to 285 days
<u>Staff and BLM file FEIS and Recommended Changes to the PMPD</u>	October 2, 2009	TBD + 255 to 285 days
Judicial review period for Energy Commission Decision ends (30 days after Commission adoption hearing)	September – October 2009	TBD + 270 to 316 days
FEIS protest period ends (30 days after NOA and FEIS is published)	November 3, 2009	TBD + 285 to 315 days
BLM issues Record of Decision, Right of Way grant and Plan Amendment (assumes no protests to BLM LUP Amendment and Governor completes consistency review)	November 3, 2009	TBD + 285 to 315 days
Governor's consistency review period ends (60 days after FEIS is published - assuming Governor completes his review in 30 days)	December 2, 2009	TBD + 315 to 345 days
BLM's resolution of any protests of its Land Use Plan Amendment proposed Decision(+ 120 days following BLM's FEIS)		TBD + 375 to 405 days

cc: Docket (07-AFC-5)
Proof of Service List



**BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT
COMMISSION OF THE STATE OF CALIFORNIA
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APPLICATION FOR CERTIFICATION
FOR THE *IVANPAH SOLAR ELECTRIC
GENERATING SYSTEM*

DOCKET No. 07-AFC-5

PROOF OF SERVICE
(Revised 4/16/09)

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DECLARATION OF SERVICE

I, Maria Santourdjian, declare that on May 18, 2009, I served and filed copies of the attached Ivanpah Solar Electric Generating System (07-AFC-5) Status Report #9. The original document, filed with the Docket Unit, is accompanied by a copy of the most recent Proof of Service list, located on the web page for this project at: **[www.energy.ca.gov/sitingcases/ivanpah]**. The document has been sent to both the other parties in this proceeding (as shown on the Proof of Service list) and to the Commission's Docket Unit, in the following manner:

(Check all that Apply)

FOR SERVICE TO ALL OTHER PARTIES:

 x sent electronically to all email addresses on the Proof of Service list;

 x by personal delivery or by depositing in the United States mail at Sacramento, CA with first-class postage thereon fully prepaid and addressed as provided on the Proof of Service list above to those addresses **NOT** marked "email preferred."

AND

FOR FILING WITH THE ENERGY COMMISSION:

 x sending an original paper copy and one electronic copy, mailed and emailed respectively, to the address below (***preferred method***);

OR

 depositing in the mail an original and 12 paper copies, as follows:

CALIFORNIA ENERGY COMMISSION

Attn: Docket No. 07-AFC-5
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I declare under penalty of perjury that the foregoing is true and correct.

Original signed by _____
Maria Santourdjian