

## DOCKETED

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<b>Project Title:</b>	Palen Solar Power Project - Compliance
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*Comment Received From: V. John White/Anne Baker*  
*Submitted On: 4/7/2014*  
*Docket Number: 09-AFC-07C*

## **Approval of Palen Project**

*Additional submitted attachment is included below.*



April 4, 2014

Commissioner Karen Douglas  
California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814

Commissioner David Hochschild  
California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814

RE: Approval of Palen Project (Docket 09-AFC-7C)

Dear Commissioners Douglas and Hochschild,

The Center for Energy Efficiency and Renewable Technologies supports the expeditious approval of the Palen project. This concentrating solar power (CSP) tower project was previously approved by CEC as a CSP trough project. We respectfully urge CEC to approve the project, with appropriate monitoring and adaptive management requirements to address the avian issues.

We believe this state of the art CSP project would provide significant benefits to the state and to the grid. Unlike solar PV, the technology provides significant amounts of mechanical inertia and voltage support, and sustained, reliable operation. Palen is located in a Bureau of Land Management development zone, identified in the BLM's Solar PEIS, and sits along a major transmission corridor.

CEERT understands and appreciates the Siting Committee's concern about approving a project without absolute and complete knowledge of the project's impacts. However, we believe this project, thoughtfully constructed and operated, is essential to California's development of a low carbon grid and the reduction of greenhouse gases. A project should not be denied based on anecdotal observations and speculation regarding potential risks to biological resources. The project sponsors have committed to the operation of a project with minimal environmental impacts and a significant investment in up front avian mitigation and the employment of adaptive management measures to reduce impacts.

Significant further delay will result in the project being financially infeasible, and will send an unfortunate signal about California's commitment to the development of advanced renewable energy, with important attributes to both the California electricity grid and substantial benefits to the state's economy. Denial of the Palen project will effectively shut the door on expansion of solar thermal in California for the foreseeable future and have a detrimental effect on this important, reliable renewable energy technology elsewhere in the U.S. and globally. Palen should be approved for construction with requirements to provide valuable scientific data regarding avoidance and deterrence methods employed for potentially impacted species.

Thank you for your consideration of CEERT's comments.

Sincerely,

A handwritten signature in black ink, appearing to read "V. John White". The signature is fluid and cursive, with the first name "V." and last name "White" clearly distinguishable.

V. John White  
Executive Director, CEERT

CC: Governor Edmund G. "Jerry" Brown, Jr.  
Commissioner Robert Weisenmiller  
Commissioner Andrew McAllister  
Commissioner Janea Scott  
Jim Kenna  
Thomas Pogacnik