

**DOCKET****09-AFC-9**DATE MAY 18 2010RECD. MAY 24 2010

May 18, 2010

Mr Eric K. Solorio,
Project Manager
Siting, Transmission and Environmental Protection Division
California Energy Commission
1516 Ninth Street, MS-15
Sacramento, CA 95814

RE: REQUEST FOR AGENCY COMMENTS ON THE STAFF ASSESSMENT FOR THE PROPOSED
RIDGECREST SOLAR PROJECT (09-AFC-9)

Dear Mr Eric Solorio:

Southern California Edison Company (SCE) appreciates the opportunity to review and provide comment on the Staff Assessment/Draft Plan Amendment/Draft Environmental Impact Statement (SA/DPA/DEIS) for the proposed Ridgecrest Solar Power Project planned by Solar Millennium LLC. The project is described as a proposal to develop a 250-megawatt (MW) solar parabolic trough power generating facility and associated infrastructure on a total of approximately 1,994 acres of land located in northeastern Kern County, along U.S. Highway 395, just west of the China Lake Boulevard exit. The site is approximately five miles southwest of Ridgecrest, California. Ridgecrest is at the southwestern boundary of the China Lake Naval Air Weapons Station (NAWS).

The SA/DPA/DEIS indicates the power produced by the proposed project would connect to a new substation that would interconnect the project into the existing SCE's Inyokern-Kramer Junction 230-kV transmission line that currently crosses the southwestern portion of the ROW boundary. Please note that the actual transmission line that will be interconnected to in this area is the BLM West-Kramer 230 kV transmission line.

Solar Millennium LLC applied to the California Independent System Operator (CAISO) for interconnection of the Ridgecrest Solar Power Project, and requested and paid for Interconnection Studies in accordance with the CAISO Large Generation Interconnect Procedures (LGIP) Tariff. All applicable interconnection studies have been completed, and Solar Millennium LLC is currently negotiating the execution of the Large Generator Interconnection Agreement (LGIA).

SCE proposes to construct the Millennium Substation and associated transmission, distribution and telecommunication facilities to interconnect the Ridgecrest Solar Power project to SCE's existing BLM West-Kramer 230 kV transmission line. SCE has prepared a description of these interconnection facilities based on planning-level assumptions and this description has been provided to Solar Millennium LLC. To the extent that further detailed engineering results in significant changes to those facilities, SCE will coordinate with Solar Millennium and regulatory agencies as appropriate.

When interconnection studies indicate the need for SCE to build new or relocate existing electrical facilities that operate at or above 50 kV, SCE construction may have environmental consequences subject to CEQA review as required by the California Public Utilities Commission (CPUC). If those environmental consequences are identified and addressed in the CEQA process for the larger project, SCE may not be required to pursue a later, separate, mandatory CEQA review through the CPUC's General Order 131-D (GO 131-D) process. If the SCE facilities are not adequately addressed in the CEQA review for the larger project and the new facilities result in significant environmental impacts, additional CEQA review could delay approval of the SCE portion of the project for two years or longer.

We request that the Revised Staff Assessment for the Ridgecrest Solar Power project include a description of SCE's facilities required for interconnection, environmental analysis of those facilities, and proposed mitigation measures where appropriate. SCE's required interconnection facilities include a new 220 kV substation, transmission and subtransmission lines, distribution lines, and telecommunication facilities. A detailed description of these required interconnection facilities were included in SCE's Millennium Substation Project Description that was previously provided to Solar Millennium LLC. Inclusion of these SCE facilities in the Revised Staff Assessment will expedite agency review of both the proposed Solar Millennium and SCE facilities for compliance with CEQA.

Please note that portions of SCE's proposed interconnection facilities will cross Federal lands, requiring additional environmental regulatory compliance pursuant to NEPA.

We look forward to working closely with the Solar Millennium LLC and the CEC to support interconnection of this project into the CAISO grid. If you have any questions regarding this letter, please do not hesitate to contact me at (626) 302-8846 or via email at Calvin.On@sce.com.

Sincerely,



Calvin On
Licensing Project Manager
Transmission Projects Licensing, Renewables and Generator Interconnections
Southern California Edison Company

C: Ridgecrest Solar Power

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