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September 30, 2010

California Energy Commission
Attn: Docket No. 09AFC6
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512

DOCKET	
09-AFC-9	
DATE	SEP 30 2010
RECD.	OCT 01 2010

Re: 09-AFC-9 Ridgecrest Solar Power Plant Project

Dear Docket Clerk:

Enclosed are an original and one copy of Status Report of California Unions for Reliable Energy. Please process the document and provide us with a conformed copy in the envelope provided.

Thank you.

Sincerely,

/s/

Valerie Stevenson
Legal Assistant

:vs
Enclosures

STATE OF CALIFORNIA

**Energy Resources Conservation
and Development Commission**

In the Matter of:

The Application for Certification for the
Ridgecrest Solar Power Plant Project

Docket No. 09-AFC-9

**STATUS REPORT OF CALIFORNIA UNIONS FOR RELIABLE
ENERGY**

September 30, 2010

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UNIONS FOR RELIABLE ENERGY

California Unions for Reliable Energy (“CURE”) submits this status report pursuant to the Committee’s August 26, 2010 Revised Scheduling Order and Order Granting Applicant’s Request to Conduct a Two-Year Biological Study. The Committee’s order requests parties to submit quarterly reports on the progress of the Applicant’s proposed Mojave Ground Squirrel Connectivity Study (“Connectivity Study”).

CURE participated in the September 9, 2010 Staff workshop regarding the scope of the Applicant’s proposed Connectivity Study and is reviewing the Applicant’s Third Revised Draft of the Proposed Mojave Ground Squirrel Connectivity Study, served on the parties on September 22, 2010. We are pleased to note that the Applicant solicited comments from stakeholders on the most recent draft of the revised proposal. We hope that any comments received from interested parties will be given due consideration by the Applicant, the Commission, and the state and federal resource agencies.

Going forward, the Commission should provide clear guidance to stakeholders regarding the relevance of the Connectivity Study. Will the Commission Staff take an active role in the development of the Study with the input of all stakeholders, or is the two year delay intended to allow the Applicant to develop data to meet the evidentiary requirements of Title 20?¹ If the former, we urge the Commission to establish clear rules for stakeholder participation at the outset of this two year endeavor to ensure that the Connectivity Study is the product of collaborative efforts.

At the September 9, 2010 workshop, CURE asked Staff how the Commission plans to facilitate intervenor and public participation in the development of the Connectivity Study. CURE was informed that anyone can submit comments, and that CURE can submit comments daily, if CURE so desires. Respectfully, this “plan” for public participation does not ensure that stakeholder input is considered and that the public will be adequately informed of the assumptions and the scope underlying Applicant’s efforts to prove no significant impacts to the viability of the Mojave Ground Squirrel if the Project is one day approved. Moreover, Staff’s recommendation to CURE would waste the Commission’s limited resources.

Now that the Commission has granted the Applicant’s request to undertake a two-year Connectivity Study, it is incumbent on the Commission to establish meaningful opportunities for public participation and to ensure transparency of the Applicant’s endeavor. Moreover, a clear record of stakeholder input would add credibility to the Study’s results.

In addition to workshops that will be noticed by Staff, we offer the following recommendations to facilitate the continued involvement of stakeholders and interested members of the public:

1. The Applicant’s interim deliverables should be made available on the Project website;
2. Intervenors and the general public must be advised of a contact to whom written comments on interim deliverables are to be directed, and the deadline for such submissions; and

¹ See Cal. Code Reg., tit. 20, § 1723.5(a)(2).

3. Written comments on the Applicant's deliverables should be made available on the Project website in advance of workshops so that they may be reviewed by all stakeholders.

In making these recommendations we note that the above procedures have been employed by the Commission in similar circumstances.²

Lastly, we are pleased to report that from CURE's perspective, the September 9 workshop evidenced a desire on the part of all parties to work with the Applicant in developing data that would be valuable for future planning efforts. We look forward to future collaboration with stakeholders and thank the Committee for the opportunity to submit this status report.

Dated: September 30, 2010 Respectfully submitted,

/s/

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² See e.g., Tentative Schedule on the Connectivity Study, In the Matter of the Application for Certification of the Carrizo Energy Solar Farm, California Energy Commission Docket No. 07-AFC-08, available at <http://www.energy.ca.gov/sitingcases/carrizo/documents/index.html> (last visited Sep. 29, 2010).

**DECLARATION OF SERVICE
RIDGECREST SOLAR POWER PROJECT
Docket No. 09-AFC-9**

I, Valerie Stevenson, declare that on September 30, 2010, I served and filed copies of the attached Status Report of California Unions for Reliable Energy dated September 30, 2010. The original document, filed with the Docket Office, is accompanied by a copy of the most recent Proof of Service list, located on the web page for this project at:

http://www.energy.ca.gov/sitingcases/solar_millennium_ridgecrest/Ridgecrest_POS.pdf.

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 Office via email and U.S. Mail as addressed below.

I declare under penalty of perjury that the foregoing is true and correct.
Executed at South San Francisco, CA on September 30, 2010.

/s/

Valerie Stevenson

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