

**THE SOLAR
ALLIANCE MEMBER
COMPANIES**

Amonix
Applied Materials
Borrego Solar
BP Solar
Community Energy
Element Power
enXco
First Solar
Kyocera Solar
Mainstream Energy
Mitsubishi Electric
Oerlikon Solar
Petra Solar
Q-Cells
Sanyo
Sharp Solar
Smart Energy Capital
SolarCity
Solaria
SolarWorld
SPG Solar
SunEdison
Sungevity
SunPower
SunRun
Suntech America
Tioga Energy
Trinity Solar
Verengo Solar Plus
Yingli Solar



December 12, 2011

The Honorable Commissioner Boyd
California Energy Commission
1516 9th St.
Sacramento, CA 95814

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|-----------------|-------------|
| DOCKET | |
| 09-AFC-9 | |
| DATE | DEC 12 2011 |
| RECD. | DEC 12 2011 |

Commissioner Boyd:

On behalf of the Solar Alliance, I would like to state our concern with the CEC Decision regarding the Solar Trust of America's Motion for Order Affirming Application of Jurisdictional Waiver for the Ridgecrest Solar Project (Docket 09-AFC-9). The Solar Alliance is a national alliance of solar photovoltaic manufacturers, integrators, and financiers dedicated to accelerating the deployment of solar electric power in the United States by promoting cost-effective state-based policies. The majority of our members do business in California, and many have offices and headquarters in California and represent many major solar developers in the state.

In particular, we are concerned that the above mentioned Motion, which seeks to establish CEC jurisdiction over the Ridgecrest project, though the project is converting from a solar thermal power generation project to a solar photovoltaic project. While we understand that SB 226 created an exemption for certain projects that meet a predefined qualification, we are concerned that the Decision creates a significant change in jurisdiction in California over the siting and permitting of PV projects which is broader than SB 226 intended.

In particular, we believe that a CEC vote in favor of the Decision will significantly harm our industry's relationship with counties that will host our projects throughout the state, and do much more harm than good for transitioning the state to clean, local energy generation. We work closely with counties to make our projects suitable to local conditions and interests. Moving decision making to Sacramento will create significant impediments to cultivating local support for local PV generation.

Given such significance, we believe that such a change is more appropriate for consideration in a deliberate policy process involving the CEC, other state agencies involved in the siting process, and local jurisdictions that are typically involved in siting and permitting PV

projects. We do not believe the Decision represents such a deliberate process.

If you have any questions or concerns about our position, please do not hesitate to contact me at 415-385-7240. Thank you for your consideration.

Best Regards,

Sara Birmingham
Director of Western Policy, The Solar Alliance