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April 18, 2012

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California Energy Commission
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Subject: Supplemental Data Response, Set 3
Hidden Hills Solar Electric Generating System (11-AFC-2)

Dear Mr. Monasmith:

On behalf of Hidden Hills Solar I, LLC; and Hidden Hills Solar II, LLC, please find attached electronic copies of Supplemental Data Response, Set 3, which addresses information requests about Project Description, Biological Resources, Socioeconomics, and Traffic & Transportation.

We plan to file this information electronically and follow-up with hard copies. Please call me if you have any questions.

Sincerely,

CH2M HILL

A handwritten signature in blue ink, reading "John L. Carrier".

John L. Carrier, J.D.
Program Manager

Encl.

c: POS List
Project file

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11-AFC-2

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Supplemental Data Response Set 3

Hidden Hills
Solar Electric Generating System
(11-AFC-2)



Application for Certification
Hidden Hills Solar I, LLC; and Hidden Hills Solar II, LLC

April 18, 2012

With Technical Assistance from



Hidden Hills Solar Electric Generating System (HHSEGS)

(11-AFC-2)

**Supplemental Data Response, Set 3
(Responses to Project Description, Biology,
Socioeconomics, and Traffic and Transportation)**

Submitted to the
California Energy Commission

Submitted by
**Hidden Hills Solar I, LLC; and
Hidden Hills Solar II, LLC**

April 18, 2012

With Assistance from
CH2MHILL
2485 Natomas Park Drive
Suite 600
Sacramento, CA 95833

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Introduction

Attached are supplemental responses (Set 3) by Hidden Hills Solar I, LLC, and Hidden Hills Solar II, LLC (collectively, “Applicant”) to the California Energy Commission (“CEC”) Staff’s data requests for the Hidden Hills Solar Electric Generating System project (“HHSEGS” or “project”) (11-AFC-2). These materials are in response to questions raised at a workshop held on February 22, 2012, information requested directly by staff (phone or email requests), or additional information that has become known since the AFC was filed.

The responses are grouped by individual discipline or topic area. Within each discipline area, the responses are numbered for tracking and reference convenience. New graphics or tables are numbered in reference to the Supplemental Data Request number. For example, if a table were used in response to Data Request BR-2, it would be numbered Table BR2-1. The first figure used in response to Data Request PD-2 would be Figure PD2-1, and so on.

Additional figures and attachments submitted in response to a data request are found at the end of the Data Responses.

Project Description (PD-2)

BACKGROUND

On April 2, 2012 the Applicant filed Supplemental Data Response, Set 2 which described changes to the project resulting from optimization of the facilities. As part of that optimization, it was proposed moving the electrical switchyard and the gas metering station across the border into Nevada. The following data request was received from Mike Monasmith.

DATA REQUEST

PD-2 Would CH2 put together a figure that shows the switchyard location and gas line/t-line routes?

Response: Figure PD2-1 presents the approximate location of the switchyard and gas metering station in Nevada and shows the linear corridors onsite.

Biological Resources (BR-2)

DATA REQUEST

BR-2. During a workshop held by the California Energy Commission on February 22, 2012, the question of potential for fairy shrimp to occur on the HHSEGS site was raised by the Center for Biological Diversity.

Response: The six federally protected fairy shrimp populations occurring elsewhere in California have no potential to occur on the HHSEGS site. As discussed below, the absence of these species from the HHSEGS site is due to their distribution range, climate and hydro-period requirements, and their habitat requirements. The climate, habitats and other requirements needed by fairy shrimp are not available on the HHSEGS site. Table BR2-1 provides additional details for each of these six species.

Range

The ranges of the six federally protected fairy shrimp species that occur elsewhere in California do not include the Pahrump Valley, and their habitats are far removed from the HHSEGS site. There are no known locations in Inyo or San Bernardino counties. The closest locations are approximately 170 miles from the HHSEGS site in western Riverside County near Temecula. Most locations occur in California coastal areas and the Central Valley.

Climate and Hydro-Period Requirements

The xeric climate of the valleys of the eastern Mojave Desert is not conducive to pooling that retains water long enough for fairy shrimp to complete their life cycle. The hydro-period requirement is defined as the length of time and portion of year (season) the wetland holds ponded water (Tarr and Babbitt, 2008). The hydro-period requirement for each species is the length of time in the appropriate season when a site must have adequate water to support incubation, maturation, and reproduction. The shortest hydro-period requirement of the six species is 17 days for the San Diego fairy shrimp (*Branchinecta sandiegonensis*). Although intense convective storms can occur near the HHSEGS site, runoff and puddles generally dry with a few days.

It is important to note that a hydro-period of sufficient duration is a necessary, but not a sufficient condition. That is, water inundation is not all that is required. In addition to water, ponds or pond complexes must have adequate temperature, pH, nutrients, oxygenation, and the presence of fairy shrimp cysts.

Habitat Requirements

Fairy shrimp habitats have certain features in common. The habitats are ephemeral ponds or pond complexes. Generally they occur in grasslands, as in the Central Valley of California. No ponds or pond complexes have been identified on the HHSEGS site. Surface conditions indicate that water pools onsite, presumably after rain events, along the edges of dirt roads, in shallow ruts of vehicles in dirt roads and at the termini of some ephemeral washes. The habitat requirements of the six fairy shrimp species require ponds of greater depth and size than these features can provide. Some species occur only in large pond complexes rather than in a single pond.

Conditions on the HHSEGS Site

The wetland delineation report site maps for the HHSEGS show some “pooling areas” on the HHSEGS site (URS, 2012). However, these areas do not have the hydro-period needed to support fairy shrimp populations.

The 2012 report (see Attachment DR88-1, Data Response Set 1C-2) states, “Several alkaline soil areas were identified during pedestrian transects within the Construction Lay-down Area. . . These alkaline soil areas lack a clearly defined bed and bank, lack of riparian or wetland vegetation, and lack of clear adjacency to a feature with an OHWM [ordinary high water mark]. They exhibit hydrological conditions indicative of inundation over an extended period of time, i.e., caking and cracking of surface soils, an absence of vegetation in the bare area with upland vegetation around the edges, and a development of cryptobiotic crust. . . Examination of soils within the alkaline soil areas indicated a lack of hydric soil characteristics or gleying. Dr. Geof Spaulding evaluated these alkaline soil areas and determined that these areas have perched topography and receive water from sheet flow that transverse the site from east to west and due to their perched topography, drain to the surrounding vegetated upland areas.”

The lack of hydric soils or signs of gleying is an important indicator that the hydro-period does not support fairy shrimp. Hydric soils develop as a result of water saturation for a period of 1 week. Some versions of the evolving definition of hydric soils include a saturation period of 2 weeks (Tiner, 1999; p. 143). By either standard, the lack of hydric soils in the pooling areas indicates that the hydro-period is less than 2 weeks. Pooling this brief cannot support fairy shrimp populations of any of the protected species long enough to complete a lifecycle. The shortest hydro-period requirement is 17 days (San Diego fairy shrimp), under very favorable conditions (70 FR 46935).

Six species of federally protected fairy shrimp can be found in California; however, none of these species have the potential to occur on the HHSEGS site. The range, hydro-period and habitat requirement of these protected species are summarized in Table BR2-1.

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TABLE BR2-1

Summary of the Range, Hydro-period and Habitat Requirements of the Six Protected Fairy Shrimp Species in California

Common Name	Scientific Name	Status	Range	Climate and Hydro-Period Requirements	Habitats
Riverside fairy shrimp	<i>Streptocephalus woottoni</i>	FE	<p>Known to occur in both hardpan and clay pan vernal pools in Ventura, San Diego, Los Angeles (now extirpated), Riverside, and Orange Counties, and in addition, in Riverside County on granitic (basaltic) substrate. Southern coastal California, United States, and northern Baja California, Mexico (Eng et al. 1990, pp. 258–259).</p> <p>Known localities are below 2,100 feet elevation and are within 50 miles of the Pacific Ocean. Riverside fairy shrimp do not occur in riverine or marine waters or other permanent bodies of water.</p>	Hydro-period requirement of more than 60 days. Maturation to reproductive age from hatching is over 2 months (60 days) for the Riverside fairy shrimp. The time period is compressed or expanded, depending on ambient water temperatures. Adults develop 48 to 56 days after inundation. (Hathaway and Simovich 1996, p. 674)	<p>Riverside fairy shrimp are considered habitat specialists, found in moderate to deep (generally ranging from 10 inches to 5 to 10 feet deep, longer-lived vernal pools and ephemeral wetlands (Eng et al. 1990, p. 259; Simovich and Fugate 1992, pp. 7–8; Hathaway and Simovich 1996, p. 39)</p> <p>Seasonal (vernal) pools, ponds, swales, and other pool-like, ephemeral (lasting a short time) water bodies (Eng et al. 1990, pp. 258–259).</p> <p>Typically, Riverside fairy shrimp restricted to relatively deep (greater than 12 inches), cool water vernal pools that are inundated for a longer time to complete their reproductive life cycle (Hathaway and Simovich 1996, p. 675)</p>

TABLE BR2-1

Summary of the Range, Hydro-period and Habitat Requirements of the Six Protected Fairy Shrimp Species in California

Common Name	Scientific Name	Status	Range	Climate and Hydro-Period Requirements	Habitats
Conservancy fairy shrimp	<i>Branchinecta conservatio</i>	FE	<p>Endemic to vernal pools in California and this species is restricted to the Central Valley except for one population in the Central Coast in Ventura County (USFWS 2007)</p> <p>Currently, the Service is aware of eight populations of Conservancy fairy shrimp, which include (from north to south): (1) Vina Plains, Butte and Tehama counties; (2) Sacramento National Wildlife Refuge (NWR), Glenn County; (3) Yolo Bypass Wildlife Area, Yolo County; (4) Jepson Prairie, Solano County; (5) Mapes Ranch, Stanislaus County; (6) University of California (U.C.) Merced area, Merced County; (7) Grasslands Ecological Area, Merced County; and, (8) Los Padres National Forest, Ventura County (59 FR 48136).</p>	<p>Hydro-period requirement of more than 19 days. Hatching can begin within one week of inundation. Average time to maturity is 46 days. In warmer pools, it can be as few as 19 days. (Helm, 1998).</p> <p>Helm (1998) found that Conservancy fairy shrimp reached maturity in an average of 46 days, and lived for as long as 154 days. However, aquatic invertebrate growth rates are largely controlled by water temperature and can vary greatly (Eriksen and Brown 1980, Helm 1998). Conservancy fairy shrimp produce one large cohort of offspring each wet season (Eriksen and Belk 1999).</p>	<p>The majority of sites inhabited by this animal are relatively large and turbid vernal pools called playa pools (Helm 1998, Eriksen and Belk 1999, Vollmar 2002). Playa pools typically remain inundated much longer than most vernal pools, often well into the summer, even though they often have maximum depths comparable to vernal pools. Playa pools are distinguished from vernal pools because they are larger in size and they are much rarer on the landscape than vernal pools (Vollmar 2002).</p>

TABLE BR2-1

Summary of the Range, Hydro-period and Habitat Requirements of the Six Protected Fairy Shrimp Species in California

Common Name	Scientific Name	Status	Range	Climate and Hydro-Period Requirements	Habitats
longhorn fairy shrimp	<i>Branchinecta longiantenna</i>	FE	Currently found in 28 counties across the Central Valley and coast ranges of California, and in Jackson County of southern Oregon. (Keeler-Wolf et.al. 1998).	Hydro-period requirement of 21 to 23 days. Capable of living in vernal pools of relatively short duration (42 to 49 days in winter and 21 days in spring) (Eriksen and Belk 1999). Habitat locations hold water for a minimum of 23 days providing adequate water for incubation, maturation, and reproduction. (50 CFR 17.97 (c)(2)(ii))	Topographic features characterized by mounds and swales and depressions within a matrix of surrounding uplands that result in complexes of continuously, or intermittently, flowing surface water in the swales connecting the pools providing for dispersal and promoting hydro-periods of adequate length in the pools. Habitat locations have soil layers that become inundated during winter rains and that continuously hold water for a minimum of 23 days, in all but the driest years; thereby providing adequate water for incubation, maturation, and reproduction. (50 CFR 17.97 (c)(2)(ii))

TABLE BR2-1
Summary of the Range, Hydro-period and Habitat Requirements of the Six Protected Fairy Shrimp Species in California

Common Name	Scientific Name	Status	Range	Climate and Hydro-Period Requirements	Habitats
San Diego fairy shrimp	<i>Branchinecta sandiegonensis</i>	FE	Generally restricted to vernal pools and other ephemeral (lasting a short time) basins in coastal Orange and San Diego Counties in southern California and in northwestern Baja California, Mexico (72 FR 70648).	Hydro-period requirement of 17 days. San Diego fairy shrimp can reach sexually maturity and begin mating in 7 to 10 days from the time the vernal pool fills with water (72 FR 70664). San Diego fairy shrimp hatch and reproduce in water at temperatures that range from 41 to 68 degrees F, and do not hatch at temperature greater than 77 degrees F (Hathway and Simovich, 1996, pp. 674–675).	Vernal pools in southern California typically contain water in the winter and are dry in the summer. The San Diego fairy shrimp is a habitat specialist found in shallower pools that range in depth from 2 to 12 inches (Simovich and Fugate 1992, p. 111; Hathaway and Simovich 1996, p. 670). San Diego fairy shrimp occur in groups of vernal pools (vernal pool complexes) (Keeler-Wolf et al. 1998, p. 9). Vernal pool complexes tend to include between 5 and 50 vernal pools. Vernal pools within a complex are generally hydrologically connected, meaning that water flows over the surface from one vernal pool basin to another and/or water flows and collects below ground until the soil becomes saturated with water, and the vernal pool basins fill with water (Hanes et al. 1990, pp. 51–56).
vernal pool fairy shrimp	<i>Branchinecta lynchi</i>	FT	California, extending from Tulare County in the south to Shasta County in the north. In 1998, these fairy shrimp were discovered in vernal pools in Jackson County, Oregon, in an area north of Medford known as the Agate Desert. (USFWS, 2005)	Hydro-period requirement of 63 days. Sexual maturity in as few as 18 days at optimal conditions of 68 degrees F, and can complete its life cycle in as little as 63 days (Gallagher 1996, Helm 1998).	Entirely dependent on the aquatic environment provided by vernal pool wetland ecosystems. The vernal pool fairy shrimp depends on the presence of water in winter and early spring, and the absence of water during summer. These specific vernal pool wetlands are dependent on intact sub-watersheds and the surrounding uplands that support those

TABLE BR2-1

Summary of the Range, Hydro-period and Habitat Requirements of the Six Protected Fairy Shrimp Species in California

Common Name	Scientific Name	Status	Range	Climate and Hydro-Period Requirements	Habitats
					<p>watersheds. Vernal pool habitat is a component of the larger grassland ecosystem of California's Central Valley.</p> <p>The vernal pool fairy shrimp requires cold winter waters to hatch and grow—typically appearing after the first frosts, and the dry summers to dry the resting cysts and prevent them from fungusing [sic]. Habitats supporting the vernal pool fairy shrimp are typically in Central Valley California floristic provinces below 300-m (984-ft) elevation. Typical habitat for vernal pool fairy shrimp in California includes vernal pools, seasonally ponded areas within vernal swales, rock outcrop ephemeral pools, playas, and alkali flats (Eng et al. 1990).</p> <p>Vernal pools that support these fairy shrimp are often grass or mud-bottomed, with clear to tea-colored water, and are often in basalt flow depression pools in grasslands (USFWS 1994, Eriksen and Belk 1999).</p>

TABLE BR2-1

Summary of the Range, Hydro-period and Habitat Requirements of the Six Protected Fairy Shrimp Species in California

Common Name	Scientific Name	Status	Range	Climate and Hydro-Period Requirements	Habitats
Vernal pool tadpole shrimp	<i>Lepidurus packardii</i>	FE	Central Valley of California and San Francisco Bay Area in 19 documented localities, primarily in Sacramento County. Also occurs in the Stillwater Plains in Shasta County; Butte County; Tehama County; Solano County; Merced County; Tulare County; Fresno County; Alameda County; and at a few locations in Yuba, Placer and Kings Counties (USFWS 2005).	Hydro-period requirement of 54 days. Sexually mature adults have been observed in vernal pools three to four weeks (21 to 28 days) after the pools had been filled (Ahl 1991). Helm (1998) found that vernal pool tadpole shrimp took a minimum of 25 days to mature and the mean age at first reproduction was 54 days. Variation in growth and maturation rates may be a result of differences in water temperature, which strongly influences the growth rates of aquatic invertebrates (USFWS 2005).	Seasonal, vernal pools or swales that form following fall and winter rains and retain water for a few months at a time (USFWS 1999). They inhabit vernal pool complexes rather than individual pools (Fugate 1992).
FT: Federally Threatened under authority of the Endangered Species Act FE: Federally Endangered under authority of the Endangered Species Act					

Socioeconomics (SE-1 through SE-6)

BACKGROUND

The following data requests related to Socioeconomics were received by phone call from Richard McCann, CEC staff support (Aspen Environmental) on January 29, 2012.

DATA REQUEST

SE-1. How was the \$3.9M in property tax derived?

Response: The \$3.9 million was derived from the assumption that only 20 percent of the total assessed value of \$1.93 billion would be subject to property tax assessment. The 20 percent assumption is an estimate assuming improvements such as buildings and fences make up about 20 percent of plant supply and erection costs. Twenty percent of the \$1.93 billion multiplied by the unitary tax rate, results in annual property tax revenues of \$3.85 million (or approx. \$3.9 million).

SE-2. How was the expiration of the property tax exclusion on solar energy projects accounted for in estimating the property tax?

Response: Because construction of the HHSEGS site is estimated to be completed before 2016 and no ownership change to the project owners is anticipated, the expiration of the property tax exclusion was not accounted for in the calculation of the annual property tax.

SE-3. What is the treatment of sales tax? Will BrightSource identify the point of sale?

Response: With respect to the Ivanpah SEGS project (07-AFC-05C), BrightSource worked with both the County of San Bernardino and the engineering/procurement/construction contractor, Bechtel, (which is reporting the majority of sales/use tax on the Ivanpah SEGS project), to maximize the amount of sales/use tax allocated to unincorporated San Bernardino County given the supply chain established for construction of the project. The Applicant is willing to work with Inyo County in the same manner to maximize the allocation of sales and use tax to the county given the supply chain that will be established for construction of the project. The arrangement has worked well with San Bernardino County at Ivanpah SEGS, and it is anticipated that a similar arrangement would work equally well with the HHSEGS project.

SE-4. Will BrightSource apply for sales tax exclusion?

Response: Currently, the Applicant is not aware of an exclusion for sales and use taxes that applies to the project. There is a program called "California Alternative Energy and Advanced Transportation Financing Authority" that provides financial assistance for renewable energy projects in the form of sales and use tax exclusions. However at this time it is only available to equipment manufacturers.

SE-5. Are the road improvement costs for the Tecopa Road (also known as Old Spanish Trail Highway) included in the costs of the project?

Response: To the extent that “road improvement” is meant to describe the road repairs required as a result of damage to Tecopa Road, if any, as a result of HHSEGS construction activities, Applicant expects and agrees to the standard CEC Condition requiring the videotaping of roads, pre-construction, and the repair of those roads for any damage related to construction activities. These costs are included in the cost estimates for the project.

SE-6. Is there a safety plan? Inyo County wants to know what’s happening with the plan.

Response: Inyo County has requested a copy of a security plan for the site. A draft Construction Security Plan is provided in confidential Attachment SE6-1, which was filed under an application for confidential designation given sensitive infrastructure security concerns.

Consistent with previous California Energy Commission decisions, Applicant also anticipates preparing an Operations Security Plan, which will be prepared prior to commencement of operations. Applicant expects that the Operations Security Plan for HHSEGS will likely contain information similar to that required in Condition of Certification HAZ-5 for the Ivanpah Solar Electric Generating System. By way of reference, an excerpt from the verification language of the HAZ-5 condition for the Ivanpah Solar Electric Generating System is provided below.

Ivanpah Solar Electric Generating System (07-AFC-5) Condition of Certification HAZ-5

The level of security to be implemented shall not be less than that described below (as per NERC 2002). The Operation Security Plan shall include the following:

1. Permanent full perimeter fence or wall, at least eight feet high around the Solar Field;
2. Main entrance security gate, either hand operable or motorized;
3. Evacuation procedures;
4. Protocol for contacting law enforcement, BLM’s Authorized Officer, and the CPM in the event of suspicious activity or emergency or conduct endangering the facility, its employees, or contractors;
5. Written standard procedures for employees, contractors, and vendors when encountering suspicious objects or packages on-site or off-site;
- 6.a. A statement (refer to sample, Attachment “B”) signed by the project owner certifying that background investigations have been conducted on all project personnel. Background investigations shall be restricted to ascertain the accuracy of employee identity and employment history, and shall be conducted in accordance with state and federal law regarding security and privacy;
- 6.b. A statement(s) (refer to sample, Attachment “C”) signed by the contractor or authorized representative(s) for any permanent contractors or other technical contractors (as determined by BLM’s Authorized Officer and the CPM after consultation with the project owner) that are present at any time on the site to repair, maintain, investigate, or conduct any other technical duties involving critical components (as determined by BLM’s Authorized Officer and the CPM after consultation with the project owner) certifying that background investigations have been conducted on contractor personnel that visit the

project site. Background investigations shall be restricted to ascertaining the accuracy of employee identity and employment history, and shall be conducted in accordance with state and federal law regarding security and privacy.

7. Site access controls for employees, contractors, vendors, and visitors;

8. Closed Circuit TV (CCTV) monitoring system, recordable, and viewable in the power plant control room and security station (if separate from the control room) capable of viewing, at a minimum, the main entrance gate; and

9. Additional measures to ensure adequate perimeter security consisting of either:

a. Security guard present 24 hours per day, seven days per week,

OR

b. Power plant personnel on-site 24 hours per day, seven days per week and **all** of the following:

1. The CCTV monitoring system required in number 8 above shall include cameras that are able to pan, tilt, and zoom (PTZ), have low-light capability, are recordable, and are able to view 100% of the perimeter fence, the outside entrance to the control room, and the front gate from a monitor in the power plant control room;

AND

2. Perimeter breach detectors **or** on-site motion detectors. The project owner shall fully implement the security plans and obtain BLM's Authorized Officer and CPM approval of any substantive modifications to the security plans. BLM's Authorized Officer and the CPM may authorize modifications to these measures, or may require additional measures, such as protective barriers for critical power plant components (e.g., transformers, gas lines, compressors, etc.), depending on circumstances unique to the facility or in response to industry-related standards, security concerns, or additional guidance provided by the U.S. Department of Homeland Security, the U.S. Department of Energy, or the North American Electrical Reliability Council after consultation with appropriate law enforcement agencies and the project owner.

SE-7. Can the list of parcels be provided? Rich wants to contact the County Assessor's office.

Response: A list of parcels is provided in Section 1.5 of the AFC, and additional landowner information (with APN numbers) is provided in Appendix 1A of the AFC.

Traffic and Transportation (TT-1 through TT-5)

BACKGROUND

Data requests TT-1 through TT-5 were received by email from Candace Hill of the California Energy Commission on January 30, February 17, and March 1, 2012.

DATA REQUEST

TT-1. The AFC states: Primary access to the project site would be from Tecopa Road to the project entrance road on the east side of the project. Secondary access would be from Tecopa Road along the west side of HHSEGS, then along the paved road between the two solar plants. Could you please provide a map depicting this primary route? Or provide an updated Figure 1.2-3 - Site Plan and Linear Facilities if that would be more efficient.

Response: Figure TT1-1 shows the primary access roads from Tecopa Road to the project site. During construction, primary access to the solar fields and the temporary laydown area will be along the western side of the project site. During operation (and during portions of construction on the eastern part of the site, for example, in the common area) primary access to the site will use a paved road on the eastern side of the site.

TT-2. Clarification: Would the construction traffic/trucks utilize the same primary access as discussed above or would there be a new access point to the 180 acre laydown area? If so, please indicate on the new map/updated figure.

Response: Access to the construction laydown area is shown on Figure TT1-1.

TT-3. Has a conceptual parking area been designed for the construction workers in the laydown area?

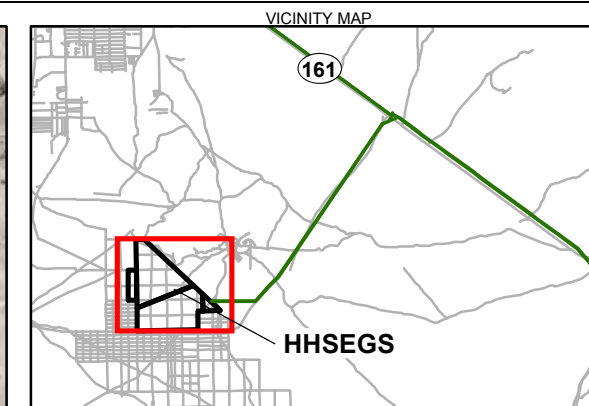
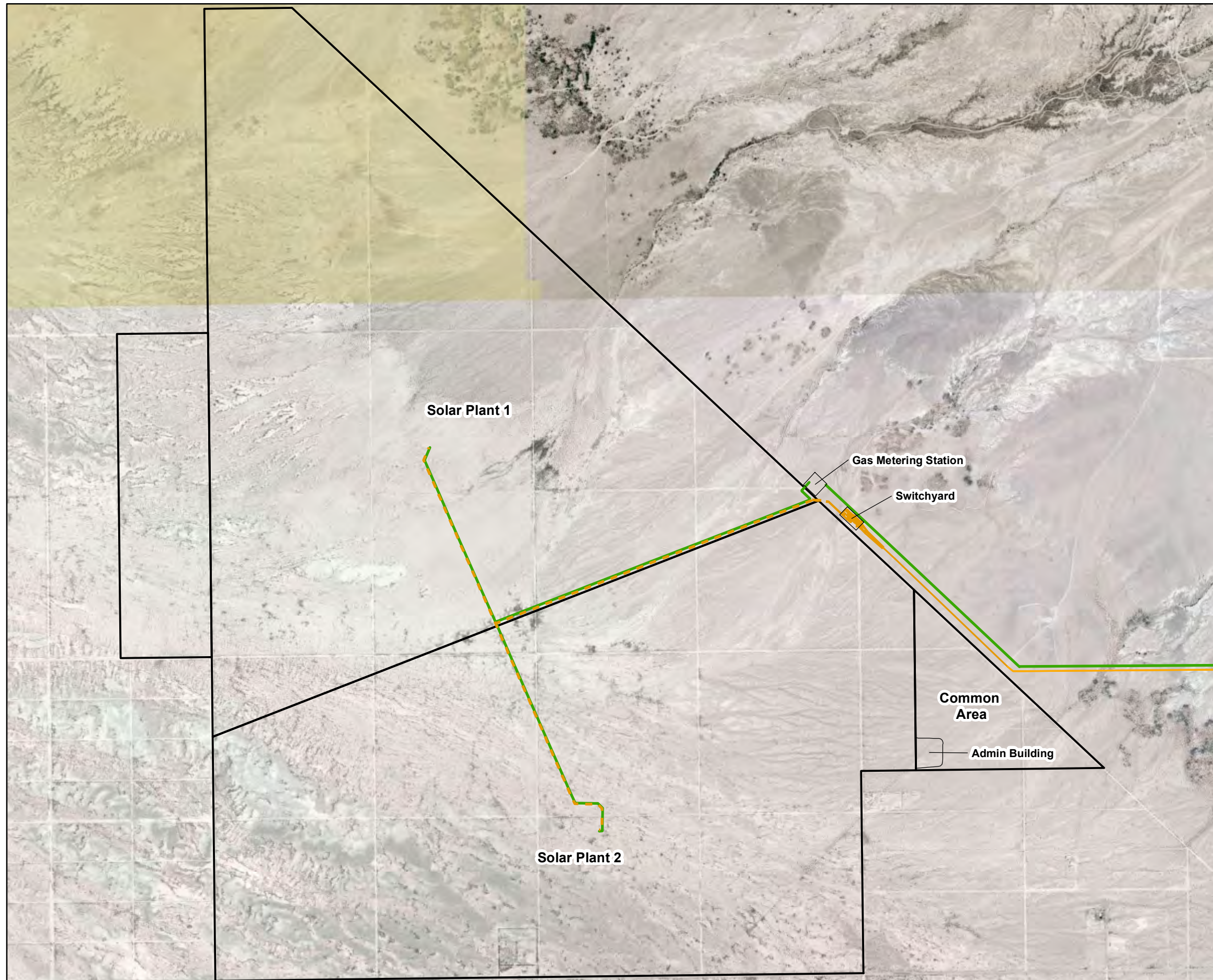
Response: Construction worker parking area will be developed as part of the detailed design phase for the project. Applicant anticipates that the PSA will include an acceptable "standard" Condition of Certification regarding parking areas.

TT-4. What is the source of the ADT shown on Figure 5.12-2?

Response: The data are from "Nevada Department of Transportation. June 9, 2010. Annual Average Daily Traffic Count Stations." This was cited in the references section of the AFC, but not noted on the figure.

TT-5. How were the seconds of delay calculated as shown in Tables 5.12-3 and 5.12-8?

Response: The intersection level of service (LOS) was calculated using the Highway Capacity Software (HCS+ McTrans, version 5.21). Since the focus of the analysis was on unsignalized intersections, the LOS was determined using seconds of delay.



- LEGEND**
- Proposed Gasline
 - Proposed Transmission Line
 - - - Underground Transmission Line
 - HHSEGS

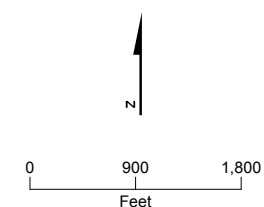
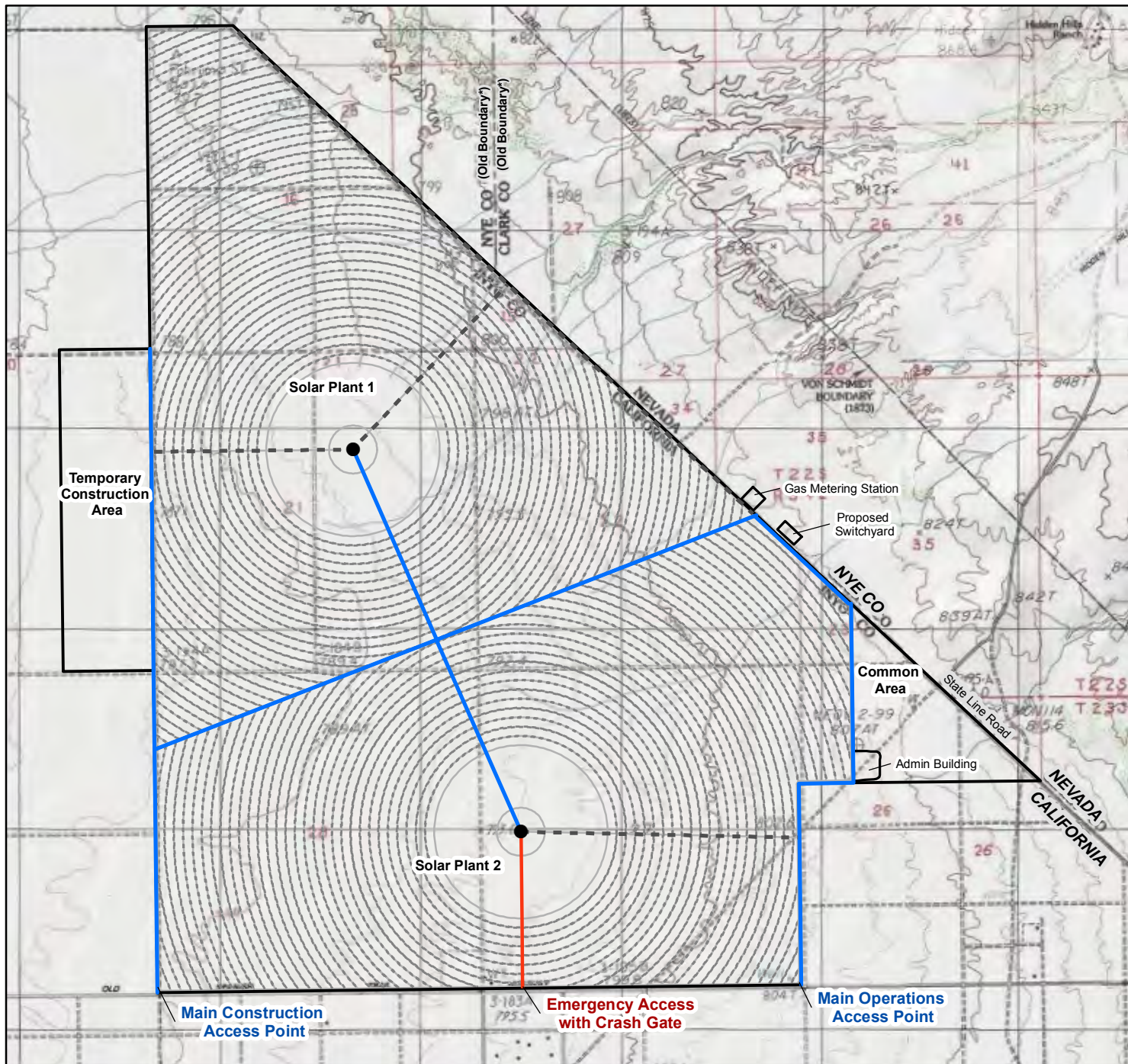


FIGURE PD2-1
Site Plan and Linear Corridors
 Hidden Hills Solar Electric Generating System



- LEGEND**
- Solar Power Towers
 - Road Type
 - Emergency Access (Paved)
 - Paved Road
 - - - Unpaved Access Road
 - - - Solar Field Maintenance Paths (Unpaved)
 - HHSEGS Boundary

*County boundary moved due to annexation, 2001

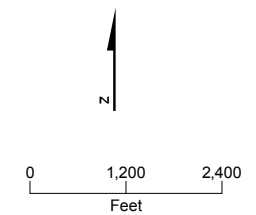


Figure TT1-1
Access Roads and Paved Internal
Roadways
Hidden Hills Solar Electric Generating System

Attachment SE6-1
Draft Construction Security Plan

Confidential Attachment SE6-1 has been submitted under an application for confidential designation.



**BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT
COMMISSION OF THE STATE OF CALIFORNIA
1516 NINTH STREET, SACRAMENTO, CA 95814
1-800-822-6228 – WWW.ENERGY.CA.GOV**

**APPLICATION FOR CERTIFICATION
FOR THE *HIDDEN HILLS SOLAR ELECTRIC
GENERATING SYSTEM***

DOCKET NO. 11-AFC-2

PROOF OF SERVICE
(Revised 3/22/2012)

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DECLARATION OF SERVICE

I, Mary Finn, declare that on April 18, 2012, I served and filed copies of the attached Hidden Hills SEGS Supplemental Data Response, Set 3, dated April 18, 2012. This document is accompanied by the most recent Proof of Service list, located on the web page for this project at: www.energy.ca.gov/sitingcases/hiddenhills/index.html.

The document has been sent to the other parties in this proceeding (as shown on the Proof of Service list) and to the Commission's Docket Unit or Chief Counsel, as appropriate, in the following manner:

(Check all that Apply)

For service to all other parties:

- ☒ Served electronically to all e-mail addresses on the Proof of Service list;
- ☐ Served by delivering on this date, either personally, or for mailing with the U.S. Postal Service with first-class postage thereon fully prepaid, to the name and address of the person served, for mailing that same day in the ordinary course of business; that the envelope was sealed and placed for collection and mailing on that date to those addresses **NOT** marked "e-mail preferred."

AND

For filing with the Docket Unit at the Energy Commission:

- ☒ by sending an electronic copy to the e-mail address below (preferred method); **OR**
- ☐ by depositing an original and 12 paper copies in the mail with the U.S. Postal Service with first class postage thereon fully prepaid, as follows:

CALIFORNIA ENERGY COMMISSION – DOCKET UNIT

Attn: Docket No. 11-AFC-2
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512
docket@energy.state.ca.us

OR, if filing a Petition for Reconsideration of Decision or Order pursuant to Title 20, § 1720:

- ☐ Served by delivering on this date one electronic copy by e-mail, and an original paper copy to the Chief Counsel at the following address, either personally, or for mailing with the U.S. Postal Service with first class postage thereon fully prepaid:

California Energy Commission
Michael J. Levy, Chief Counsel
1516 Ninth Street MS-14
Sacramento, CA 95814
mlevy@energy.state.ca.us

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, that I am employed in the county where this mailing occurred, and that I am over the age of 18 years and not a party to the proceeding.



Mary Finn
CH2M Hill