

DOCKETED

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STATE OF CALIFORNIA

Energy Resources
Conservation and Development Commission

In the Matter of:

Petition For Amendment for the
**PALEN SOLAR ELECTRIC
GENERATING SYSTEM**

DOCKET NO. 09-AFC-07C

**DECLARATION OF GUSTAVO
BUHACOFF**

I, Gustavo Buhacoff, declare as follows:

1. I am presently employed by BrightSource Energy as a Director of O&M.
2. A copy of my professional qualifications and experience was included with my Supplemental Testimony and is incorporated by reference in this Declaration.
3. I prepared the attached supplemental rebuttal testimony relating to Traffic and Transportation for the Petition for Amendment for the Palen Solar Electric Generating System (California Energy Commission Docket Number 09-AFC-07C).
4. It is my professional opinion that the attached prepared testimony is valid and accurate with respect to issues that it addresses.
5. I am personally familiar with the facts and conclusions related in the attached prepared testimony and if called as a witness could testify competently thereto.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct to the best of my knowledge and that this declaration was executed on July 17 2014.



Gustavo Buhacoff

**PALEN SOLAR ELECTRIC GENERATING SYSTEM
TRAFFIC AND TRANSPORTATION
GLINT AND GLARE
EFFECTIVENESS OF CURRENT CONDITIONS
SUPPLEMENTAL REBUTTAL TESTIMONY**

I. Names:

Gustavo Buhacoff

II. Purpose:

I provide this Supplemental Rebuttal Testimony to address the issues relating to glint and glare and the effectiveness of current conditions raised by the CEC Staff in its Supplemental Staff Assessment and Opening Testimony for the Palen Solar Electric Generating System (PSEGS) (09-AFC-7C).

III. Qualifications:

A complete description of my qualifications was previously presented in Exhibit 1137'

To the best of my knowledge all referenced documents and all of the facts contained in this testimony are true and correct. To the extent this testimony contains opinions, such opinions are my own. I make these statements and provide these opinions freely and under oath for the purpose of constituting sworn testimony in this proceeding.

IV. Rebuttal:

In response to complaints filed by pilots in the compliance docket for the Ivanpah Solar Electric Generating System (ISEGS) Project, Staff conducted an investigation. As a result of that investigation, Staff stated that it no longer supported the conclusions of the Presiding Member's Proposed Decision (PMPD) that potential glint and glare impacts to air traffic would be mitigated to less than significant levels with the incorporation of Condition of Certification **TRANS-7**. I strongly disagree with Staff's conclusion and believe that the current version of Condition of Certification **TRANS-7** is appropriate and the PMPD conclusion should remain as is.

Condition of Certification **TRANS-7** acknowledges the possibility that glint and glare could result in pilot complaints. It requires that the project owner prepare a Heliostat Positioning Plan, which identifies areas of glint and glare concerns and addresses how the heliostats will be positioned to

minimize glint and glare that could pose impacts offsite. One of the central tenets of the condition is that it specifies a complaint resolution process which includes investigation and corrective mitigation action. The analyses in both the Revised Staff Assessment and the PMPD acknowledge the potential that errant heliostats could result in complaints, including complaints by pilots. The condition requires investigation and resolution of those complaints. This is essentially the same approach required by ISEGS conditions.

I understand that in response to the complaints, ISEGS contracted with Dr. Clifford Ho of Sandia Corporation to conduct an investigation, prepare a report and make recommendations should they be warranted. Dr. Ho's report, Exhibit 1191 has been completed and has been docketed with the CEC. That report makes recommendations concerning ISEGS Heliostat Positioning Plan.

In response to the recommendations contained in Exhibit 1191, ISEGS has revised its Heliostat Positioning Plan required by ISEGS conditions. I have reviewed this revised plan and I understand that ISEGS will be finalizing and docketing it shortly. Therefore, it is my opinion that the current **TRANS-7** proposed in the PMPD, which would essentially yield the same result (investigation and revising the Heliostat Positioning Plan), is effective and will support the Committee's finding that complaints will be resolved to reduce the potential glint and glare impacts to pilots to less than significant levels.