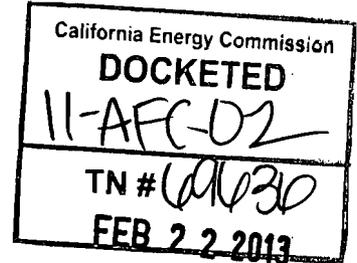


PRE-HEARING CONFERENCE STATEMENT

Jon Zellhoefer
PO Box 34
Tecopa, CA 92389
(775) 751-9461
jon@zellhoefer.info



STATE OF CALIFORNIA
State Energy Resources
Conservation and Development Commission

In the Matter of:)
)
)
HHSEGS)
)
)
)
)

DOCKET NO. 11-AFC-02
PRE-HEARING
CONFERENCE STATEMENT

PREHEARING CONFERENCE STATEMENT OF INTERVENOR JON ZELLHOEFER

This statement preliminarily identifies issues intervenor Jon Zellhoefer intends to raise at the public evidentiary hearing for the Hidden Hills Solar Energy Generating System in Inyo County, CA. Mr. Zellhoefer submits this statement preliminarily and subject to change because Mr. Zellhoefer does not yet know what additional evidence or arguments the County of Inyo, Commission Staff, Other Intervenors or the Applicant may present in pre-hearing conference statements or at the pre-hearing conference. Accordingly, Mr. Zellhoefer reserves the right to supplement and/or amend this statement as necessary to address any such evidence or argument.

The Pre-hearing Conference Order identifies eight topics (a to i) to be addressed in this statement. These topics are addresses below:

*indicates change

a) The subject areas that are complete and ready to proceed to Evidentiary Hearing;

As of February 19, 2013, Mr. Zellhoefer does not object to a finding of completeness and readiness to proceed to evidentiary hearing for any topic area listed below:

1. Project Description; 2. Project Alternatives; 3. Facility Design; 4. Power Plant Efficiency; 5. Power Plant Reliability; 6. Transmission System Engineering; 7. Transmission Line Safety/Nuisance; 8. Air Quality; 9. Greenhouse Gas Emissions; 10. Public Health; 11. Worker Safety/Fire Protection; 12. Hazardous Materials Management; 13. Waste Management; 14. Biological Resources; 15. Soil and Water Resources; 16. Cultural Resources; 17. Geological and Paleontological Resources; 18. Land Use; 19. Traffic and Transportation; 20. Socioeconomics (including Environmental Justice and Growth Inducing Impacts); 21. Noise and Vibration; 22. Visual Resources.

b) The subject areas that are not complete and not yet ready to proceed to Evidentiary Hearing, and the reasons therefor.

Mr. Zellhoefer is aware that many unresolved issues exists between the parties to these proceedings, however, Mr. Zellhoefer would not support a continuance of the hearing. Mr. Zellhoefer does not have any incomplete subject areas.

c) The subject areas that remain disputed and require adjudication, and the precise nature of the dispute for each subject area;

Mr. Zellhoefer does not have any disputed subjects that requires adjudication.

d) The identity of each witness sponsored by each party.

Mr. Zellhoefer is available to be a witness in matters associated with the impact of the project on the area known as Tecopa. Background and resume are attached as exhibit 400. At present Mr. Zellhoefer has no testimony to offer.

e) Subject areas upon which a party desires to cross-examine witnesses, a summary of the scope of each such cross-examination (including voir dire of any witness' qualifications), the issue(s) to which the cross examination pertains, and the time desired for each such cross-examination.

Mr. Zellhoefer has no subject areas upon which he desires to cross-examine any witnesses.

f) A list identifying exhibits and declarations that each party intends to offer into evidence and the technical subject areas to which they apply.

Mr. Zellhoefer is satisfied with the exhibits and declaration made by the parties to this matter and intends to offer no new evidence or declarations.

g) Subject areas for which the Applicant will seek either a Commission override due to public necessity and convenience pursuant to Public Resources Code section 25525 or a specific finding that overriding economic, legal, social, technical or other benefits outweigh the significant effects on the environment pursuant to Public Resources Code section 21081(b).

Mr. Zellhoefer will not seek either an override (PRC 25525) or specific finding (PRC 21081(b)).

h) Proposals for briefing deadlines, impact of scheduling conflicts, or other scheduling matters.

Mr. Zellhoefer is not aware of any scheduling conflicts and is available to attend the currently scheduled conferences at the current noticed locations.

i) For all subject areas, a description of any proposed modifications to the proposed conditions of certification listed in the Final Staff Assessment (FSA) based upon enforceability, ease of comprehension, and consistency with the evidence.

Mr. Zellhoefer has concerns with several of the conditions of certification listed in the FSA. However, Mr. Zellhoefer is not an expert in these areas (Socio-Economics, Traffic, Taxes, and Environmental) and is not proposing any modification to the FSA.

February 19, 2013
Date

Jon Zellhoefer
Signature
(Original on hard copy docketed)



Check box if continuation pages are attached.
(Proof of Service attached)

Exhibit 400:

Background and qualifications of Intervenor Jon Zellhoefer

I am the Trustee of the Zellhoefer Trust which is the owner of the commercial/industrial business property (160 acres) commonly known as downtown Tecopa. I am also the owner of unimproved residential/commercial zoned raw land (120 acres) adjacent to the trust property. These properties served the mining industry from 1888 to 1984. During various times both rail and trucks transported silver, iron, asbestos, and talc ore from local mines to the LA area. The property has several buildings including the area post office, general store, and restaurant. Mail has been delivered to Tecopa since 1884. At one time the property had over 250 RV spaces. Tecopa is the closest commercial zoned property to the HHSEGS site in California. I have been involved in the community since 1969 and have extensive familiarity with the road known as Tecopa Road (Old Spanish Trail), and the challenges of being a great distance from County services.

I am a former elected board member (2007-2011) of the Southern Inyo Fire Protection District and I am familiar with their needs and procedures.

Since 1996, I have been a certified energy contractor for the Department of Energy, Federal Energy Management Program.

From 1992 to 2003, I was a license electrical contractor in California (C-10).

Education:

2003 – Doctor of Jurisprudence, Monterey College of Law

1986 – Master's of Business Administration, California State University Fullerton

1975 – B.S. Engineering, University of California at Los Angeles

DECLARATION OF SERVICE

I, Jon Zellhoefer, declare that on February 19, 2013, I served and filed copies of the attached Pre-Hearing Conference statement, dated February 19, 2013. This document is accompanied by the most recent Proof of Service, which I copied from the web page for this project at: <http://www.energy.ca.gov/sitingcases/hiddenhills/>.

The document has been sent to the other persons on the Service List above in the following manner:

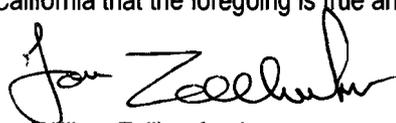
(Check one)

For service to all other parties and filing with the Docket Unit at the Energy Commission:

- I e-mailed the document to all e-mail addresses on the Service List above and personally delivered it or deposited it in the US mail with first class postage to those parties noted above as "hard copy required"; OR
- Instead of e-mailing the document, I personally delivered it or deposited it in the US mail with first class postage to all of the persons on the Service List for whom a mailing address is given.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that I am over the age of 18 years.

Dated: February 19, 2013


Jon William Zellhoefer, Intervenor



**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-02

**PROOF OF SERVICE
(Revised 2/15/13)**

SERVICE LIST:

APPLICANT

BrightSource Energy
Stephen Wiley
Michelle L. Farley
Bradley Brownlow
1999 Harrison Street, Suite 2150
Oakland, CA 94612-3500
swiley@brightsourceenergy.com
mfarley@brightsourceenergy.com
bbrownlow@brightsourceenergy.com

BrightSource Energy
Clay Jensen
Gary Kazio
410 South Rampart Blvd., Suite 390
Las Vegas, NV 89145
cjensen@brightsourceenergy.com
gkazio@brightsourceenergy.com

APPLICANTS' CONSULTANTS

Strachan Consulting, LLC
Susan Strachan
P.O. Box 1049
Davis, CA 95617
susan@strachanconsult.com

CH2MHill
John Carrier
2485 Natomas Park Drive, Suite 600
Sacramento, CA 95833-2987
jcarrier@ch2m.com

APPLICANT'S COUNSEL

Chris Ellison
Jeff Harris
Samantha Pottenger
Ellison, Schneider and Harris, LLP
2600 Capitol Avenue, Suite 400
Sacramento, CA 95816-5905
cte@eslawfirm.com
jdh@eslawfirm.com
sgp@eslawfirm.com

INTERVENORS

Jon William Zellhoefer
P.O. Box 34
Tecopa, CA 92389
jon@zellhoefer.info

Center for Biological Diversity
Lisa T. Belenky, Sr. Attorney
351 California Street, Suite 600
San Francisco, CA 94104
lbelenky@biologicaldiversity.org

Center for Biological Diversity
Ileene Anderson
Public Lands Desert Director
PMB 447
8033 Sunset Boulevard
Los Angeles, CA 90046
ianderson@biologicaldiversity.org

Old Spanish Trail Association
Jack Prichett
857 Nowita Place
Venice, CA 90291

jackprichett@ca.rr.com

INTERVENORS (Cont'd.)

Cindy R. MacDonald
3605 Silver Sand Court
N. Las Vegas, NV 89032
sacredintent@centurylink.net

Richard Arnold
P.O. Box 3411
Pahrump, NV 89041
rwarnold@hotmail.com

Amargosa Conservancy
Donna Lamm, Executive Director
Brian Brown
Watershed Coordinator
Route 127, P.O. Box 63
Shoshone, CA 92384
donnalamm@amargosaconservancy.org
*dates@chinaranch.com

County of Inyo
Randy H. Keller, County Counsel
Dana Crom
Deputy County Counsel
244 N. Edwards St., P.O. Box M
Independence, CA 93526
dcrom@inyocounty.us

*William D. Ross
Law Offices of William D. Ross
520 South Grand Avenue
Suite 300
Los Angeles, CA 90071-2610

INTERVENORS (Cont'd.)

*Southern Inyo Fire Protection District
Larry Levy, Fire Chief
410 Tecopa Hot Springs Road
Tecopa, CA 92389
Levy2717@access4less.net
*HARD COPY REQUIRED

INTERESTED AGENCIES

California ISO
e-recipient@caiso.com

Great Basin Unified APCD
Duane Ono
Deputy Air Pollution Control Officer
157 Short Street
Bishop, CA 93514
dono@gbuapcd.org

Nye County
Lorinda A. Wichman, Chairman
Board of County Supervisors
P.O. Box 153
Tonopah, NV 89049
lawichman@gmail.com

Nye County Water District
L. Darrel Lacy
Interim General Manager
2101 E. Calvada Boulevard
Suite 100
Pahrump, NV 89048
llacy@co.nye.nv.us

National Park Service
Michael L. Elliott
Cultural Resources Specialist
National Trails Intermountain Region
P.O. Box 728
Santa Fe, NM 87504-0728
Michael_Elliott@nps.gov

Southern Inyo
Fire Protection District
Larry Levy, Fire Chief
P.O. Box 51
Tecopa, CA 92389
sifpd@yahoo.com

ENERGY COMMISSION STAFF

Mike Monasmith
Senior Project Manager
mike.monasmith@energy.ca.gov

Richard Ratliff
Staff Counsel IV
dick.ratliff@energy.ca.gov

Kerry Willis
Staff Counsel
kerry.willis@energy.ca.gov

ENERGY COMMISSION – PUBLIC ADVISER

Blake Roberts
Assistant Public Adviser
publicadviser@energy.ca.gov

COMMISSION DOCKET UNIT

California Energy Commission
– Docket Unit
Attn: Docket No. 11-AFC-02
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512
docket@energy.ca.gov

OTHER ENERGY COMMISSION PARTICIPANTS (LISTED FOR CONVENIENCE ONLY):

After docketing, the Docket Unit will provide a copy to the persons listed below. Do not send copies of documents to these persons unless specifically directed to do so.

KAREN DOUGLAS
Commissioner and Presiding Member

*DAVID R. HOCHSCHILD
Commissioner and Associate Member

Ken Celli
Hearing Adviser

Galen Lemei
Adviser to Presiding Member

Jennifer Nelson
Adviser to Presiding Member

TBD
Adviser to Associate Member

Eileen Allen
Commissioners' Technical Adviser for Facility Siting