

Memorandum

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To: James D. Boyd, Presiding Member
Jeffrey Byron, Associate Member

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From: California Energy Commission - Christopher Meyer
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Subject: **STIRLING ENERGY SYSTEMS SOLAR ONE PROJECT (08-AFC-13)
ISSUES IDENTIFICATION REPORT**

Attached is the U.S. Bureau of Land Management (BLM) and California Energy Commission staff's Issues Identification Report for the Stirling Energy Systems Solar One (SES Solar One) Project (08-AFC-13). This report serves as a preliminary scoping document that identifies potential issues that BLM and Energy Commission staff believe will require careful attention and consideration. Energy Commission staff will present the issues report at the Informational Hearing and Site Visit to be held on June 22, 2009.

The SES Solar One Project is being reviewed by the BLM and Energy Commission under a joint state and federal process. The joint agency review will require additional steps and time in order to integrate the federal review process under the National Environmental Policy Act (NEPA) with the Energy Commission's process. A discussion on the joint agency process and scheduling issues is provided in the body of this document. Meeting the proposed schedule will require resolving issues expeditiously and working closely and efficiently with the BLM as co-lead agency. The agencies intend to develop a joint Final Staff Assessment (FSA)/Final Environmental Impact Statement (FEIS) that fully addresses the issues and responsibilities of both agencies.

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TKG

cc: Docket (08-AFC-13)
Proof of Service List

Attachment

**STIRLING ENERGY SYSTEMS
SOLAR ONE PROJECT
(08-AFC-13)**

June 12, 2009

ISSUES IDENTIFICATION REPORT

CALIFORNIA ENERGY COMMISSION

Siting, Transmission and Environmental Protection Division

**ISSUES IDENTIFICATION REPORT
STIRLING ENERGY SYSTEMS
SOLAR ONE PROJECT**

(08-AFC-13)

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ISSUES IDENTIFICATION REPORT

The purpose of this U.S. Bureau of Land Management (BLM) and California Energy Commission staff report is to inform the Committee and all interested parties of any potential issues that have been identified in the case thus far. Issues are identified as a result of our discussions with federal, state, and local agencies, and our review of the Stirling Energy Systems Solar One (SES Solar One) Project Application for Certification (AFC), Docket Number 08-AFC-13. This Issues Identification Report contains a project description, summary of any potentially significant environmental and engineering issues, and a discussion of the proposed project schedule. The staff will address the identification of any issues and progress towards their resolution in periodic status reports to the Committee.

PROJECT LOCATION

The proposed SES Solar One Project is located on 8,230 acres of public land within the Mojave Desert managed by the Bureau of Land Management. The project site is immediately north of Interstate 40 approximately 115 miles east of Los Angeles and 37 miles east of Barstow, California in a primarily open area of undeveloped land in San Bernardino County. The SES Solar One site is located south of the Cady Mountain Wilderness Study Area (WSA) and north of the Pisgah Crater, which is located within the BLM-designated Pisgah Area of Critical Environmental Concern (ACEC).

The SES Solar One Project site and the proposed boundary for development of the project are within Townships 8 and 9 of the San Bernardino Meridian.

The off-site single-circuit generation interconnection transmission line would be constructed a distance of approximately 0.14 mile to connect the SES Solar One Project to the SCE Pisgah Substation. The currently undefined single-circuit transmission line route will be defined by a linear survey and would be routed through portions of Township 8 North, Range 6 East, Section 18. Electric and communications utility services for the Main Services Complex would be constructed in Township 8 North, Range 5 East in Section 15 to the overhead utility lines located on the south side of National Trails Highway. The applicant will define these currently undefined utility ROWs by linear surveys. Staff will request the final information on these linear facilities during the discovery process. A temporary site access road would be constructed from I-40 to the eastern boundary of the SES Solar One site. The temporary site access road would generally follow an existing road and would include new off-and-on ramps to the westbound lanes of I-40. The temporary site access road would be defined by a linear survey, and would be routed through portions of Township 8 North, Range 6 East, Sections 17, 20 and 21.

PROJECT DESCRIPTION

The proposed SES Solar One Project would be a nominal 850-megawatt (MW) Solar Stirling Engine project, with construction planned to begin in either mid or late 2010. Although construction would take approximately 41 months to complete, power would be available to the grid as each of the 567 1.5-MW, three-phase, 60-hertz, 60-unit groups of Stirling Engine modules is completed. The primary equipment for the generating facility would include approximately 34,000, 25-kilowatt solar dish Stirling systems (referred to as SunCatchers), their associated equipment and systems, and their support infrastructure. Each SunCatcher consists of a solar receiver heat exchanger and a closed-cycle, high-efficiency solar Stirling engine specifically designed

to convert solar power to rotary power then driving an electrical generator to produce electricity.

The project would be constructed in two phases. Phase I of the project would consist of up to 20,000 SunCatchers configured in 333 1.5-MW solar groups of 60 SunCatchers per group and have a net nominal generating capacity of 500 MW. Phase II would add approximately 14,000 SunCatchers, expanding the project to a total of approximately 34,000 SunCatchers configured in 567-1.5-MW solar groups with a total net generating capacity of 850 MW.

The 8,230-acre project site is located on public land managed by the BLM. The applicant has applied for a ROW grant for the project site from the BLM California Desert District. Although the project is phased, it is being analyzed in this AFC as if all phases will be operational at the same time.

Within the project boundary, the SunCatchers in Phase I would require approximately 5,838 acres and those in Phase II would require approximately 2,392 acres. The total area required for both phases, including the area for the operation and administration building, the maintenance building, and the substation building, would be approximately 8,230 acres. A portion of the 220-kV transmission line that would be built for the SES Solar One Project would parallel the Burlington Northern Santa Fe (BNSF) Railroad ROW and the remaining portion would parallel the SCE transmission line within the project boundary.

PROCESS DESCRIPTION

The SunCatcher is a 25-kilowatt-electrical (kWe) solar dish Stirling system designed to automatically track the sun and collect and focus solar energy onto a power conversion unit (PCU), which generates electricity. The system consists of a 38-foot-high by 40-foot-wide solar concentrator in a dish structure that supports an array of curved glass mirror facets. These mirrors collect and concentrate solar energy onto the solar receiver of the PCU.

The PCU converts the focused solar thermal energy into grid-quality electricity. The conversion process in the PCU involves a closed-cycle, four-cylinder, 35-horsepower reciprocating Solar Stirling Engine utilizing an internal working fluid of hydrogen gas that is recycled through the engine. The Solar Stirling Engine operates with heat input from the sun that is focused by the SunCatcher's dish assembly mirrors onto the PCU's solar receiver tubes, which contain hydrogen gas. The PCU solar receiver is an external heat exchanger that absorbs the incoming solar thermal energy. This heats and pressurizes the hydrogen gas in the heat exchanger tubing, and this gas in turn powers the Solar Stirling Engine.

A generator is connected to the Solar Stirling Engine; this generator produces the electrical output of the SunCatcher. Each generator is capable of producing 25 kWe at 575 volts alternating current (VAC)/60 hertz (Hz) of grid-quality electricity when operating with rated solar input. Waste heat from the engine is transferred to the ambient air via a radiator system similar to those used in automobiles.

The hydrogen gas is cooled by a standard glycol-water radiator system and is continually recycled within the engine during the power cycle. The conversion process does not consume water. The only water consumed by the SunCatcher is for washing of the mirrors to remove accumulated dust and replenishing small losses to the cooling system radiator in a 50-50 glycol-water coolant.

TRANSMISSION

The project would include the construction of a new 230-kV substation approximately in the center of the project site. This new substation would be connected to the existing SCE Pisgah Substation adjacent to the project site via approximately 2-miles (0.14-mile off-site) of single-circuit, 220-kV transmission line. In addition, the proposed project would require SCE to expand and upgrade the existing 220-kV SCE Pisgah Substation to support the increase in voltage to 500-kV, loop the Eldorado-Lugo 500kV line into the SCE Pisgah Substation and demolish 65 miles of the existing Lugo-Pisgah No. 2 220-kV transmission and replace it with new towers and conductor. In addition, modifications within the SCE Eldorado and Lugo substations would be required.

The Energy Commission staff will require additional environmental and engineering information on the proposed SCE system upgrades, including the substation upgrades, 65 miles of 220-kV transmission line demolition, and the construction of the 500-kV transmission line. Although the substation and transmission line upgrades will be permitted by the California Public Utilities Commission (CPUC), these upgrades must be evaluated as part of the joint Energy Commission/BLM review as reasonably foreseeable impacts. SCE will complete an environmental review and apply for a Certificate of Public Convenience and Necessity (CPCN) from the CPUC and the CPUC and BLM would normally conduct a California Environmental Quality Act (CEQA)/National Environmental Policy Act (NEPA) review for the transmission upgrade project separate from the SES Solar One Project. However, the agencies are reviewing the status of the proposed SCE transmission line to determine if the CPCN application review can be incorporated into the current joint BLM/Energy Commission process for the SES Solar One Project. The issues related to combining the environmental reviews of the proposed SES Solar One Project and the upgrade of the SCE transmission system are discussed further in the Scheduling Issues section of this document.

WATER USE AND DISCHARGE

When completed, the Solar One Project would require a total of approximately 36.2 acre-feet of water per year. SunCatcher mirror washing and operations dust control under regular maintenance routines would require a daily average of approximately 25.8 gallons per minute of water, with a daily maximum requirement of approximately 43.7 gallons per minute of water during the summer peak months each year, when each SunCatcher receives a single mechanical wash. Each of the 34,000 SunCatchers would receive approximately eight normal washes each year, requiring approximately 14 gallons of demineralized water each time, and four scrub washes each year, taking approximately 42 gallons of demineralized water each time.

Water for mirror washing, fire water, and domestic use would be provided from wells drilled on-site. SunCatcher mirror washing requires the water to be demineralized to prevent mineral deposits forming on the SunCatcher mirrors. Processes available for demineralization are reverse osmosis (RO) and ion exchange, with RO being the preferred process. The appropriate technological process will be determined during the environmental review process.

The water treatment wastewater generated by the RO unit contains relatively high concentrations of total dissolved solids (TSD). Wastewater or brine generated by the RO unit would be discharged to a concrete-lined evaporation pond, or equivalent. After the brine has gone through the evaporation process, the solids that settle at the bottom of the evaporation pond would be tested and disposed of in an appropriate

non-hazardous waste disposal facility. Two ponds, sized to contain approximately 2 million gallons, would be constructed. The second pond would be utilized while the first pond is undergoing evaporation.

ENERGY COMMISSION AND BUREAU OF LAND MANAGEMENT JOINT REVIEW PROCESS

The BLM and the Energy Commission have executed a Memorandum of Understanding concerning their intent to conduct a joint environmental review of the project in a single National Environmental Policy Act (NEPA)/California Environmental Quality Act (CEQA) process. It is in the interest of the BLM and the Energy Commission to share in the preparation of a joint environmental analysis of the proposed project to avoid duplication of staff efforts, to share staff expertise and information, to promote intergovernmental coordination at the local, state, and federal levels, and to facilitate public review by providing a joint document and a more efficient environmental review process.

Under federal law, the BLM is responsible for processing requests for rights-of-way to authorize the proposed project and associated transmission lines and other facilities to be constructed and operated on land it manages. In processing applications, the BLM must comply with the requirements of NEPA, which requires that federal agencies reviewing projects under their jurisdiction consider the environmental impacts associated with the proposed project construction and operation.

As the lead agency under CEQA, the Energy Commission is responsible for reviewing and ultimately approving or denying all applications to construct and operate thermal electric power plants, 50 MW and greater, in California. The Energy Commission's facility certification process carefully examines public health and safety, environmental impacts and engineering aspects of proposed power plants and all related facilities such as electric transmission lines and natural gas and water pipelines.

The first step in the Energy Commission's review process was for staff to determine whether or not the AFC contains all the information required by its regulations. When the Energy Commission determined the AFC was complete at the May 6, 2009 Business Meeting, staff began the data discovery and issue analysis phases.

POTENTIAL MAJOR ISSUES

This portion of the report contains a discussion of the potential issues the Energy Commission and BLM staffs have identified to date. This report may not include all the significant issues that may arise during the case, as discovery is not yet complete, and other parties have not had an opportunity to identify their concerns. The identification of the potential issues contained in this report was based on our judgement of whether any of the following circumstances will occur:

- Significant impacts may result from the project which may be difficult to mitigate;
- The project as proposed may not comply with applicable laws, ordinances, regulations or standards (LORS);
- Conflicts may arise between the parties about the appropriate findings or conditions of certification for the Commission decision that could result in a delay to the schedule.

BUREAU OF LAND MANAGEMENT SCHEDULING ISSUES

There are several potential scheduling issues that must be resolved in order for the SES Solar One Project to meet the proposed licensing process schedule. The BLM has notified the Energy Commission that the requirements and mandates established under NEPA for completing an Environmental Impact Statement (EIS) for the project may result in a longer time period to process than one year. Several components of the BLM NEPA process are not within the direct control of the agency. For example, BLM is required to publish Notices of Availability for the Draft Environmental Impact Statement (DEIS) and FEIS in the Federal Register (FR). Departmental policy requires all FR Notices to be reviewed and approved by the Assistant Secretary for Lands and Minerals (ASLM). BLM does not control the timing of reviews outside the agency. Since the proposed project would require a land use plan amendment, the BLM is also required to have a 90-day comment period on a DEIS after which all comments must be addressed in the FEIS and Decision. The time necessary to respond to comments and incorporate responses into a FEIS is a function of the number and complexity of comments. Because of the extent of the area affected by the project, BLM anticipates a high level of interest in the project. The BLM has consulted with the US Fish & Wildlife Service (USFWS) and it has been determined that threatened or endangered species are on the project site and a Biological Opinion (BO) will be necessary. The BLM may not be able to complete its portions of a Preliminary Staff Assessment (PSA)/DEIS and FSA/FEIS within estimated time frames due to the requirements identified above.

As a result of the BLM noticing requirements, the Energy Commission and BLM staffs have developed a schedule that meets the minimum BLM noticing requirements and is as close to the Energy Commission's standard 12-month schedule as reasonably possible. It should be noted that BLM has significant concerns regarding their ability to thoroughly address NEPA requirements in a compressed schedule. We share their concerns and recognize that additional time may be required to address and resolve all issues from the perspective of both the BLM and Energy Commission staff. However, notwithstanding these reservations, the staffs of both agencies recommend adoption of this schedule, recognizing the challenges presented by this review period. We will utilize the required periodic status reports to report any future delays in the proceeding.

SUMMARY OF ISSUES AND DATA REQUESTS

The following table lists all the subject areas evaluated and notes those areas where critical or significant issues have been identified in this Issues Identification Report and if data requests have been prepared. Even though an area is identified as having no significant issues, it does not mean that an issue will not arise related to the subject area. For example, disagreements regarding the appropriate conditions of certification may arise between staff and applicant that will require discussion at workshops or even subsequent hearings. Staff believes the technical areas that are identified as having potentially significant issues could impact the project schedule.

Technical Subject Area	Potential Significant Issues	Data Req.	Technical Subject Area	Potential Significant Issues	Data Req.
Alternatives	No	Yes	Reliability	Yes	Yes
Air Quality	No	Yes	Socioeconomics	No	No
Biological Resources	Yes	Yes	Soils and Water	Yes	Yes
Cultural Resources	Yes	Yes	Traffic & Transportation	No	Yes
Efficiency	No	Yes	Transmission Safety	No	No
Geo/Paleo Resources	No	Yes	Transmission Sys. Eng.	No	No
Hazardous Material	No	No	Visual Resources	Yes	Yes
Land Use	Yes	Yes	Waste Management	No	Yes
Noise	No	Yes	Worker Safety & Fire Protection	No	No

ISSUES DISCUSSION

BIOLOGICAL RESOURCES

Due to the undisturbed nature of the area, the number of endangered species and other biological resources on or adjacent to the proposed project site, the complexity of developing mitigation plans agreeable to the Energy Commission, BLM, and resource agencies, Energy Commission staff are concerned about both the scope of the potential biological resource impacts and the possible scheduling delays while the agencies work with the applicant on proper mitigation strategies.

The desert tortoise (*Gopherus agassizii*) found on the project site is both state and federally protected. If the project is approved, the applicant would be required to both relocate any desert tortoise found in the area of potential effect (APE), and provide mitigation agreed on by the BLM, Energy Commission, California Department of Fish and Game, and USFWS. The BLM and the resource agencies continue to work towards a standardized approach for mitigating the significant biological impacts of large-scale renewable projects.

Agency staff are also concerned about the complexity surrounding the identification of appropriate relocation habitat for any desert tortoise found on the project site that does not subject the individual tortoises to increased environmental pressures such as predation, overpopulation, or shortages of food or water. In addition, the existence of upper respiratory tract disease (URTD), cutaneous dyskeratosis (CD), and other infectious diseases will require careful examination of both any relocated tortoise and the tortoise populations in the potential receiving locations to prevent the spread of disease to healthy populations.

The BLM and Energy Commission staff will continue to work with the resources agencies and the applicant to fully address the potential impacts to biological resources on the proposed SES Solar One Project in an expeditious manner. Nonetheless, the sheer scope of biological impacts involved in a project that covers almost 13 square miles of undeveloped desert habitat will require significant time for analysis.

CULTURAL RESOURCES

Due to the relatively undisturbed nature of the area, the high frequency of identified cultural resources on or adjacent to the proposed project site, and the potential for unidentified cultural resource sites, BLM and Energy Commission staff are engaged in developing solutions to the impacts that the proposed SES Solar One Project would have on cultural resources. It is the intent of the BLM and Energy Commission staff to gather the additional information necessary to construct an adequate picture of the cultural environment of the project area, and to enable the BLM and the Energy Commission staff to formulate substantive resolutions to the issues identified.

Staff is still analyzing the potential impacts of the installation of 34,000 SunCatchers and associated facilities over the 8,230-acre project site, with 143 known archaeological sites, and is examining how the impacts would be mitigated. Although the nature of the installation of the SunCatcher technology allows for reduced ground disturbance and flexibility in the location of the individual units, the construction of the project would, nonetheless, lead to the whole or partial destruction of a number of cultural resources.

The BLM and Energy Commission staff will continue to work together, and with local Native American communities, to fully address the potential impacts to cultural resources on the proposed SES Solar One Project in an expeditious manner. Nonetheless, the sheer volume of information involved in a project that covers almost 13 square miles of undeveloped land will require significant time for analysis.

LAND USE

The BLM and Energy Commission staff are concerned about the allocation of federal lands for the proposed SES Solar One Project. A total of approximately 8,230 acres (Phases I and II of the Project) would be developed with 34,000 SunCatchers and associated ancillary facilities and linears, which would result in approximately 2,712 acres of total permanent surface disturbance. Construction would result in temporary surface disturbance of approximately 3,270 acres.

The lands within the project site boundary are composed primarily of undeveloped desert that are managed under the BLM's California Desert Conservation Area (CDCA) Plan. In addition, there are some private parcels (with a San Bernardino County zoning designation of Resource Conservation) that are located within the project boundary. These private parcels would be under the jurisdiction of the County of San Bernardino. However, according to the AFC (page 5.9-15) "*...they are not owned or controlled by the Project and will not be enclosed within the Project fence line, and they are not considered part of the Project.*"

The following issues need to be addressed in the joint Staff Assessment /Environmental Impact Statement:

- The land use impacts of the Solar One Project arise primarily from the conversion of 8,230 acres in the Resource Conservation zone of the San Bernardino General Planning Area from BLM-administered public land use, to solar energy capture and energy conversion apparatus, attendant outbuildings, supporting structures (e.g., electric transmission line and substation), roadways, parking lots, etc.
- The project would permanently convert the open space nature of land use at the project site to an industrial use for the generation of power.

- Other proposals for land uses in the vicinity and within the overall CDCA Plan area must be considered and analyzed from a cumulative impact basis.

RELIABILITY

Energy Commission staff will examine the reliability of the Stirling SunCatcher technology and analyze the maintenance requirements of the SunCatcher units. This is an important issue given how much public land would be used by the proposed project.

SOIL AND WATER RESOURCES

The 8,230-acre site is traversed by numerous drainages that convey intermittent flash flood flows from the adjacent mountains. Site development could affect these flows and result in downstream erosion and sedimentation that would have significant impacts on environmental resources. Flood flows could also impact Suncatcher foundations, assembly and maintenance buildings, and vehicle access roads. A detailed drainage, erosion and sediment control plan needs to be developed for the project that addresses these potential impacts and provides mitigation measures that will render these hazards to a level less than significant, both as a protection to the environment and to address the continued dispatchability of the renewable energy source. Due to the size of the proposed project site, staff is concerned about the time necessary to developing the detailed drainage, erosion and sediment control plan. Staff will address these issues through data requests to the applicant.

VISUAL RESOURCES

Given the size and location of the project, staff is analyzing several issues related to visual resources. The project envisions the construction of 34,000 SunCatchers, the associated facilities, and linears on 8,230 acres of public land administered by the BLM. These would be new intrusions on what is primarily undeveloped desert landscape and will affect the visual quality and character of the area.

The BLM and Energy Commission staff have expressed concerns on the project's potential visual impacts. These include impacts to recreational visitors in nearby recreational destinations. A visual analysis that conforms to BLM regulations, including development of Interim Visual Resource Management (VRM) classifications for the viewshed is being developed by the BLM and Energy Commission staffs. It is the intent of Energy Commission staff to work closely with BLM staff to develop the Interim VRM mapping needed to evaluate the project under the BLM VRM methodology.

This process of developing interim VRM mapping together with BLM staff must be completed prior to preparation of the Preliminary Staff Assessment/Draft Environmental Impact Statement (PSA/DEIS) visual analysis and be consistent with both the Energy Commission and BLM visual assessment methodologies. The agency staffs have already begun this coordinated effort. Energy Commission staff will participate in any workshop where visual resources will be discussed and will work with BLM staff to incorporate the Visual Resource Management classification within staff's visual resource methodology.

SCHEDULING ISSUES

The schedule on page 11 requires additional time beyond the Energy Commission staff's standard review process schedule for key events. This schedule focuses on Energy Commission and Bureau of Land Management staff document publications and event noticing requirements. Meeting this ambitious schedule will require: resolving issues expeditiously, working closely and efficiently with the Bureau of Land Management as co-lead federal agency, and the applicant providing timely and comprehensive responses to staff's information requests.

The Energy Commission, BLM and California Public Utilities Commission are currently reviewing the potential to include the review of the proposed upgrades to Southern California Edison's (SCE) Pisgah to Lugo transmission system as part of the joint Energy Commission/BLM documents. The upgrades would include the expansion of the Pisgah Substation from 220 kV to 500 kV and the replacement of 65 miles of existing 220 kV transmission line with a 500 kV transmission line. Although the environmental review of the transmission line and substation upgrades might be incorporated into the joint Energy Commission/BLM Preliminary Staff Assessment/Draft Environmental Impact Statement (PSA/DEIS) for the SES Solar One Project site, the CPUC would retain permitting authority over the transmission portion of the project. Assuming responsibility for the environmental review of the transmission system upgrade could substantially delay completion of the SES Solar One Project. In addition to increasing the workload of Energy Commission staff, review of the transmission system upgrades cannot be started until Southern California Edison (SCE) files an application for a Certificate of Public Convenience and Necessity (CPCN) with the CPUC, which may not occur until late August of 2009 or later.

In addition, San Bernardino County requested a role in the proposed project referencing the following language in the March 2008 Memorandum of Understanding (MOU) between the BLM and San Bernardino County that allows the county to act as a cooperating agency in the joint review process:

"The California Energy Commission ("CEC") acts as the CEQA lead agency for thermal energy projects of 50 megawatts or greater. The County is the CEQA lead agency for virtually all other projects that include private land. In all cases, the County desires to have local interests represented in the environmental review process. In any case where either the CEC is the CEQA lead agency or when CEQA review is not required, the County will be a cooperating agency with the BLM during its NEPA review process if County resources allow."

The participation of San Bernardino County, as well as the CPUC if the upgrade to the Pisgah to Lugo transmission line is reviewed as part of the proposed project, would require the coordination of four agencies in the review of the project.

If the applicant receives approval from the Energy Commission and BLM to commence with construction, the applicant would be required to comply with resource agency mandated constraints on season and environmental conditions. The U.S. Fish and Wildlife Service (USFWS) generally requires that any translocation procedures necessary be completed during the spring (i.e., March - May) or fall (i.e., late August to early October) to avoid extreme temperatures. Additional guidance has been provided by the USFWS in the following temperature requirements for the handling of the desert tortoise:

“For all activities: No desert tortoise shall be captured, moved, transported, released, or purposefully caused to leave its burrow for whatever reason when the ambient air temperature is above 95° F (35° C). No desert tortoise shall be captured if the ambient air temperature is anticipated to exceed 95° F (35° C) before handling or processing can be completed. If the ambient air temperature exceeds 95° F (35° C) during handling or processing, desert tortoises shall be kept shaded in an environment that does not exceed 95° F (35° C), and not released until ambient air temperature declines to below 95° F (35° C).”

BUREAU OF LAND MANAGEMENT INFORMATION

BLM related dates are in Blue in the following proposed project schedule.

BLM Schedule Acronyms:

ASLM - Assistant Secretary for Lands and Minerals

BA - Biological Assessment

BLM - Bureau of Land Management

BO - Biological Opinion

EIS - Environmental Impact Statement

DEIS –Draft Environmental Impact Statement

FEIS - Final Environmental Impact Statement

FR - Federal Register

IBLA - United States Interior Board of Land Appeals

NOA - Notice of Availability

NOI - Notice of Intent

ROD - Record of Decision

USFWS - United States Fish and Wildlife Service

WO - BLM Washington Office

STAFF'S PROPOSED SCHEDULE – SES SOLAR ONE PROJECT

Activity	Date
Application filed by project owner	Dec 01, 2008
Project Deemed Data Inadequate	Jan 14, 2009
Project Deemed Data Adequate	May 06, 2009
Energy Commission Committee assigned to oversee AFC process	May 06, 2009
BLM publishes NOI in FR (45-day scoping)	Jun 08, 2009
CEC/BLM staff files Issues Identification Report	Jun 12, 2009
CEC/BLM staff files data requests	Jun 17, 2009
Informational hearing and site visit/ BLM scoping meeting	Jun 22, 2009
Applicant provides data responses	Jul 15, 2009
Data response and issue resolution workshop/ 2nd BLM Scoping Meeting	Aug 06, 2009
CEC/BLM Staff files data requests (round 2, if necessary)	Aug 27, 2009
Applicant provides data responses (round 2, if necessary)	Sep 25, 2009
Data response and issue resolution workshop (round 2, if necessary)	Oct 08, 2009
Local, state, and federal agency determinations	Oct 15, 2009
BLM NOA on PSA/DEIS to WO and ASLM	Nov 04, 2009
NOA of PSA/DEIS in FR	Nov 19, 2009
PSA/DEIS filed (90-day comment period required)	Nov 19, 2009
BLM submits BA to USFWS (Start 135-day consultation)	Nov 19, 2009
PSA Workshop/ DEIS public meetings	Jan 14, 2010
Close BLM comment period	Feb 17, 2010
Local, state and federal agency final determination	Feb 17, 2010
Prepare responses to comments and add to FSA/FEIS	*TBD
NOA FEIS to WO and ASLM	*TBD
USFWS Issues BO	*TBD
NOA of FSA/FEIS in FR	*TBD
Final Staff Assessment/ FEIS filed	*TBD
CDCA Plan Amendment protest period ends	*TBD
Prehearing/Evidentiary hearings start	*TBD
Energy Commission Committee files proposed decision	*TBD
Hearing on the proposed decision	*TBD
Close of public comments on the proposed decision	*TBD
Addendum/revised proposed decision	*TBD
BLM ROD (start 60-day federal review, 30-day protest, IBLA appeal)	*TBD
Commission Decision	*TBD

*To Be Determined (TBD)



**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 SES SOLAR ONE PROJECT**

Docket No. 08-AFC-13

PROOF OF SERVICE

(Revised 6/8/09)

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DECLARATION OF SERVICE

I, Teraja` Golston declare that on June 15, 2009, I served and filed copies of the attached SES Solar One (08-AFC-13) Issues Identification Report. The original document, filed with the Docket Unit, is accompanied by a copy of the most recent Proof of Service list, located on the web page for this project at: [www.energy.ca.gov/sitingcases/solarone]. 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 Unit, in the following manner:

(Check all that Apply)

FOR SERVICE TO ALL OTHER PARTIES:

X sent electronically to all email addresses on the Proof of Service list;

X by personal delivery or by depositing in the United States mail at _____ with first-class postage thereon fully prepaid and addressed as provided on the Proof of Service list above to those addresses NOT marked "email preferred."

AND

FOR FILING WITH THE ENERGY COMMISSION:

X sending an original paper copy and one electronic copy, mailed and emailed respectively, to the address below (*preferred method*);

OR

 depositing in the mail an original and 12 paper copies, as follows:

CALIFORNIA ENERGY COMMISSION

Attn: Docket No. _____

1516 Ninth Street, MS-4

Sacramento, CA 95814-5512

docket@energy.state.ca.us

I declare under penalty of perjury that the foregoing is true and correct.

Original Signature in Dockets

Teraja` Golston