

April 20, 2010

Mr. Christopher Meyer CEC Project Manager Attn: Docket No. 08-AFC-13

California Energy Commission 1516 Ninth Street

Sacramento, CA 95814-5512

Mr. Jim Stobaugh
BLM Project Manager
Attn: Docket No. 08-AFC-13
Bureau of Land Management

P.O. Box 12000 Reno, NV 89520 **DATE** APR 20 2010

08-AFC-13

DOCKET

RECD. APR 20 2010

RE: Calico Solar Project

Applicant's Submission of Additional Information from April 16th Workshop

Dear Mr. Meyer and Mr. Stobaugh,

Tessera Solar, on behalf of the Applicant, hereby submits additional information requested during the April 16th workshop.

Water

Provide Applicant's Proposed Changes to SOIL & WATER-3:

Please rewrite the portion of SOIL & WATER-3 as shown below.

SOIL & WATER-3 The project owner shall ensure that all SunCatcher pole foundations are designed to withstand storm water scour from surface erosion and/or channel migration. The project owner shall also develop a Storm Water Damage Monitoring and Response Plan to evaluate potential impacts from Storm water, including pole foundations that fall due to storm water flow or otherwise break and scatter mirror debris and other SunCatcher components on to the ground surface...

Monitor and inspect Periodically, Before First Seasonal and After Every <u>10-Year</u> Storm Event:

Biology

Describe off road access requirements to the SunCatchers:

Vehicular traffic for maintenance of the Suncatchers will generally be performed from the North-South maintenance roads. For certain maintenance activities, off-road vehicle access to the Suncatcher will occur, and these tasks include;

- Remove and swap out of the PCU at the 2,000 hours of operation for planned maintenance
- Pressure washing mirror facets
- Unplanned repairs or replacement of components of the Suncatcher weighing over
 75 pounds

For these repairs, vehicles could include pickup trucks, boom lifts, cranes and the PCU change out truck:

- Removal and swap out of the PCU for planned maintenance: this will occur every two years once construction has been completed. Since the SunCatchers are accepted in blocks, this planned maintenance will ripple through the facility every two years as a wave of PCU swaps. These swaps typically occur with the SunCatcher in "maintenance stow" which is a north facing position. This would consistently place the swap vehicle (a single axle boom truck) in the area immediately north of the SunCatcher.
- Pressure washing mirror facets the facets on the SunCatcher dish will be washed every 40 days or approximately 9-10 times per year. Like PCU swaps, the SunCatcher is placed into a north facing "wash stow" for wash operations, and the wash operations would ripple across the field as a wave. The wash truck would occupy the same general ground position for a wash as it would for PCU swaps.
- Unplanned repairs or replacement of components of the Suncatcher weighing over 75 pounds: approximately 2.2% of the PCUs will experience random failures on a monthly basis. This would require maintenance work at the SunCatcher, on average, once every 45 months. Swap and troubleshooting operations for unplanned maintenance would be performed in the maintenance stow SunCatcher orientation, but the locations of the unplanned repairs would be randomly dispersed across the field at each occurrence.

Provide a Description of Process and Schedule for Sediment Removal in Detention Basins:

The detention basins are sized to hold sediment from up to a 100-year storm event. After each major storm event, the detention basins would be inspected to determine whether they need to be cleaned and to check for wildlife that may be trapped in the basins. The detention basins are anticipated to be emptied approximately one time per year or less, depending on weather conditions. When the detention basins are to be emptied, a biological monitor will be present to confirm absence of Desert Tortoise prior to and during sediment removal. Should sediment removal take more than 7 days, a silt fence would be erected to temporarily exclude tortoise from the area.

Worker Safety

Provide Applicant's Proposed Changes to WORKER SAFETY-2:

Please rewrite the portion of WORKER SAFETY-2 as shown below.

Verification: At least thirty (30) days prior to the start of commissioning, the project owner shall submit to BLM's authorized officer and the CPM for approval a copy of the Project Operations and Maintenance Safety and Health Program.

Cultural Resources

Prepare a figure depicting the proposed schedule for Project development:

The requested map is provided as Attachment A to this response.

Transportation

Provide Applicant's Proposed Changes to TRANS-10:

Please rewrite the portion of TRANS-10 as shown below.

TRANS-10 – Park-and-Ride Site. Prior to mobilization activities the project owner shall confer with San Bernardino Associated Governments regarding project employee use of the carpool lot, designated "L" Street Lot. If, during construction of the Calico project, the lot is continuously full, the Applicant will implement a program to increase the number of carpool spaces by 50.

Verification: When the project workforce exceeds 100 workers for the first time, and weekly thereafter, the project owner shall have the "L" street carpool lot inspected. The Project Owner shall include in its Monthly Compliance Reports the results of these inspections. If, and when, it is determined that the carpool lot is at capacity, the project owner shall either (a) increase the size of the "L" Street lot by 50 spaces, (2) create a temporary lot of 50 spaces or (3) determine if another method of facilitating carpool workers is achievable. The project owner shall submit a plan for increasing the number of carpool spaces to the County of San Bernardino for approval, and the approved plan shall be submitted to the CPM.

Provide a discussion on the timing of construction of Calico Phase 1, SCE transmission upgrades, and Calico Phase 2:

The Calico Project's timing is dependent on the transmission build schedule from SCE. Under the LGIA signed between Calico Solar, SCE and CAISO, the 275 MW upgrade to Pisgah substation will be finished at the earliest by 7/31/2011. As such, Calico Phase 1 is being constructed so as to have the first 9 MW block online by 7/31/2011. The remaining 9 MW blocks will then be built out over time with construction being complete by 8/31/2012 of Phase 1. The full build out of transmission for all 850 MW by SCE under the LGIA will be finished at the earliest by 1/1/2014. Therefore, construction of Calico Solar will resume towards the end of 2013 with the first 9 MW block online by 1/1/2014. The remaining 9 MW blocks will then be built over time with construction being complete of all 850 MW by the third quarter of 2015.

Efficiency

Provide a discussion on the efficiency of development:

The SunCatcher technology requires between 6 to 7 acres per MW on average for development. This statement is accurate for a relatively flat tract of land where no provision needs to be made for resources on site that need to be avoided or accommodated in some fashion. Due to the modular nature of the SunCatcher, however, its development and construction does not require completely leveling a site. As a result of this, Tessera Solar is able to build around sensitive species, cultural findings, particular habitats and rock outcroppings that define the landscape as well as avoid terrain that is less than ideal for development. The Calico site was chosen and sized with those considerations in mind. Given that it is BLM land and not disturbed agricultural land, Tessera Solar requested more than the typical average acreage needed for an 850 MW plant. As a result of this, Calico Solar will be able to avoid the flood plains south of the railroad, the sensitive species found on site, critical cultural findings, defining rock outcroppings and the Mojave Fringe Toed Lizard on site. If Tessera Solar were using a

less modular technology than the SunCatcher, less land might be taken, but at the expense of extensive site grading and a complete loss.

I certify under penalty of perjury that the foregoing is true, correct, and complete to the best of my knowledge.

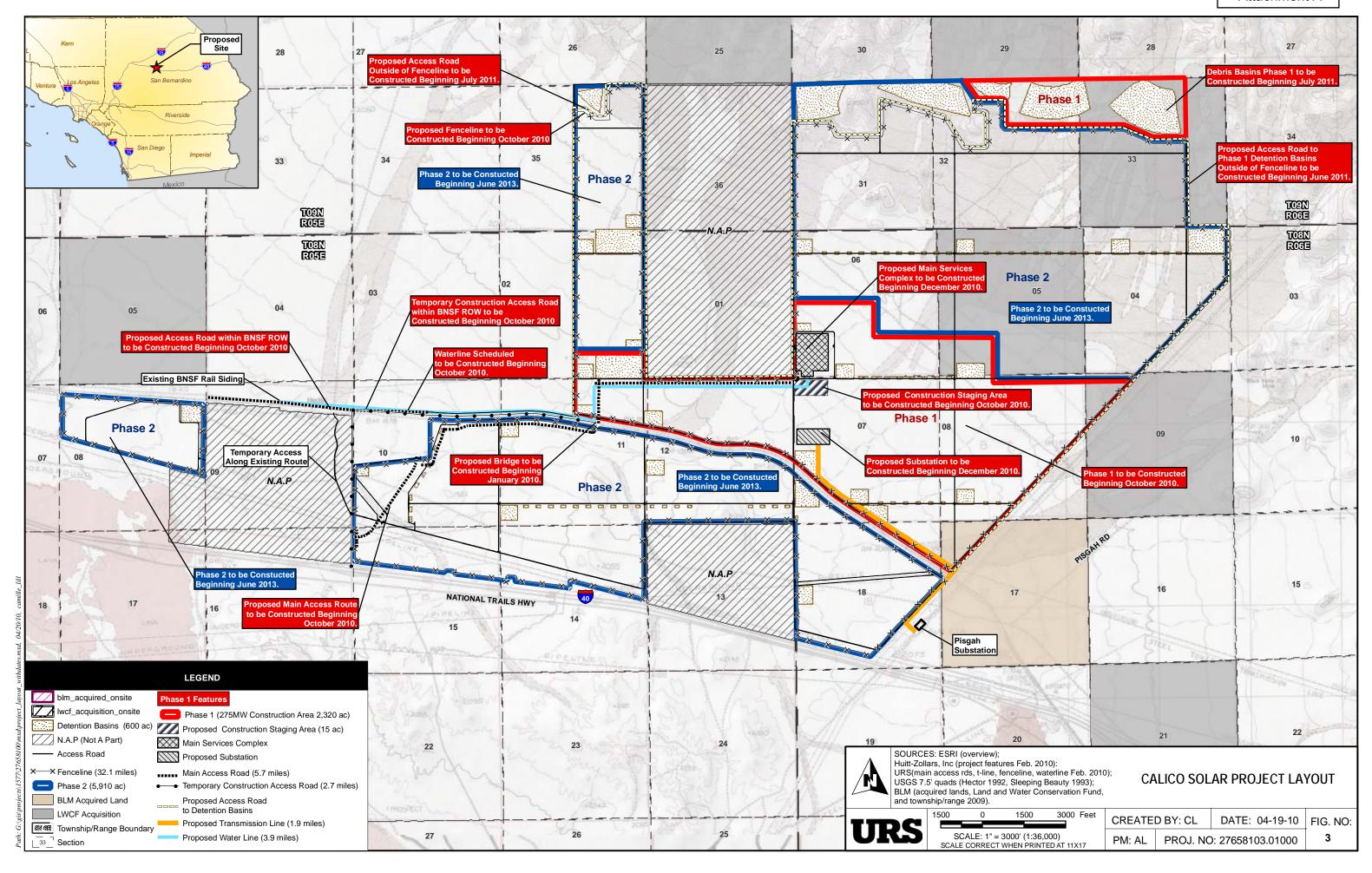
Sincerely,

Felicia Bellows

Vice President of Development

Attachments:

Attachment A: Project Layout with Expected Construction Dates





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 CALICO SOLAR (Formerly SES Solar One)

Docket No. 08-AFC-13

PROOF OF SERVICE

(Revised 2/8/10)

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DECLARATION OF SERVICE

I, <u>Corinne Lytle</u> , <u>declare that on <u>April 20, 2</u>010, I served and filed copies of the attached <u>Applicant's Submittal of Information</u> Requested During the April 16, 2010 Workshop, dated April 20, 2010. 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].</u>	
The documents have 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;	
<u>X</u> 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 ori ginal paper copy and one electronic copy, m below (<i>preferred method</i>);	ailed and emailed respectively, to the address
OR	
depositing in the mail an original and 12 paper copies, as follows:	
CALIFORNIA ENERGY COMMISSION Attn: Docket No. 08-AFC-13 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.	
	Signed By
Corinn	ne Lytle