

June 2, 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

DOCKET

08-AFC-13

DATE JUN 02 2010

RECD. JUN 02 2010

RE: Calico Solar (formerly Solar One) Project (08-AFC-13)
Applicant's Submittal of Alternative Site Layout #2, Engineering Figure with SunCatcher Layout,
and Revised Project Boundary with 4000' Desert Tortoise Corridor Figure

Dear Mr. Meyer and Mr. Stobaugh,

Tessera Solar hereby submits the Applicant's Alternative Site Layout #2, Engineering Figure with SunCatcher Layout, and Revised Project Boundary with 4000' Desert Tortoise Corridor Figure.

On May 14, 2010 a Supplement was filed that described modifications to the Project's northern boundary. Based on input from the U.S. Fish and Wildlife Service's Desert Tortoise Recovery Office (DTRO) and the Bureau of Land Management (BLM), the northern boundary of the Project site has been further modified to include a 4,000-foot wildlife corridor between the Project (inclusive of all detention basins) and the base of the Cady Mountains. To accommodate this modification, the detention basins were re-configured to extend east to west along the northern Project boundary and the boundary between Phases 1 and 2. Through this change in detention basin design, two objectives are achieved: the detention basins are included within the Project fenceline and outside of the 4,000-foot wildlife corridor, as requested by the wildlife agencies, and the detention basin design maintains the natural drainage patterns of the site.

The modified northern Project boundary avoids many of the detected sensitive plant species, as discussed in the Applicant's Submittal of First Round Spring Botany Survey Results. Additionally, the attached current engineering of the SunCatcher layout avoids Environmentally Sensitive Areas (ESAs) south of the railroad and within the Project boundary. The ESAs avoided within the Project boundary include all detected occurrences of white-margined beardtongue.

As noted in the Applicant's comments on the Staff Assessment/Draft Environmental Impact Statement (SA/DEIS), the original 8,230-acre Project area was requested for the build out of an 850 MW Project, recognizing that some acreage would likely be ceded to allow for building around sensitive species and cultural areas, where practicable. Compared to the avoidance of the donated lands alternative that would create avoided areas that would be surrounded by the solar project, the Alternative Site Layout #2 provides for a wildlife corridor adjacent to existing open areas. Alternative Site Layout #2 can accommodate the development of 850 MW, allowing the Applicant to meet the conditions of the Power Purchase Agreement (PPA). As further explanation of that, below is the information filed in Calico Solar's recent status report:

The project described in the original Application for Certification (AFC) identified the 850 MW project as occupying 8,230 acres. These numbers essentially correspond to the generating capacity established in the Power Purchase Agreement signed with Southern California Edison in 2005 and the number of acres involved in the Plan of Development filed with the Bureau of Land Management in 2005.

On an ideal square site with flat topography and no environmental or physical impediments, the SunCatcher technology requires 6 to 7 acres per megawatt. This means that an 850 MW power plant would require approximate 5950 acres of land for the solar field plus additional land for the supporting facilities on flat, unencumbered land. The amount of land included in the lease agreement for the Calico Solar Project was larger than the physical space required for the SunCatchers and related facilities in order to accommodate for any environmental resources or physical features that may influence site development. These included cultural resources, biological resources, flood prone areas, and slope exceeding 10%.

The initial site map, prepared by Stantec in October 2008, stamped as preliminary and shown as figure 3-3 in the AFC, was a general layout of the site. It showed the solar field and support facilities based on preliminary engineering and initial site evaluation using the available land. It identified a 500 MW phase one occupying approximately 5,838 acres and a 350 MW phase two occupying the remaining 2,392 acres. Because final engineering and site design work had not been completed, the configuration of the solar field was very general.

The applicant has recently hired Mortenson Construction who will be construction contractor and is also working with the applicant's sister company, Stirling Energy Systems, to complete final engineering, site design work, and detailed site layout. They have also been reflecting lessons learned from the commercial Maricopa Solar Project. During this process, the applicant asked Mortenson Construction to prepare an environmental avoidance/reduced boundary layout of the site. As a first step, they laid out the 275 MW first phase of the project in the east central portion of the site that avoided the majority of the cultural, biological, and flood prone areas of the site and minimized the distance needed to desert tortoise translocation. They also eliminated the satellite services complex, reduced the size of the construction lay-down area, and tightened up the land needed for other support facilities. They then distributed the remainder of the phase two solar field on the site in a manner to make the footprint as small as possible while considering the environmental avoidance areas.

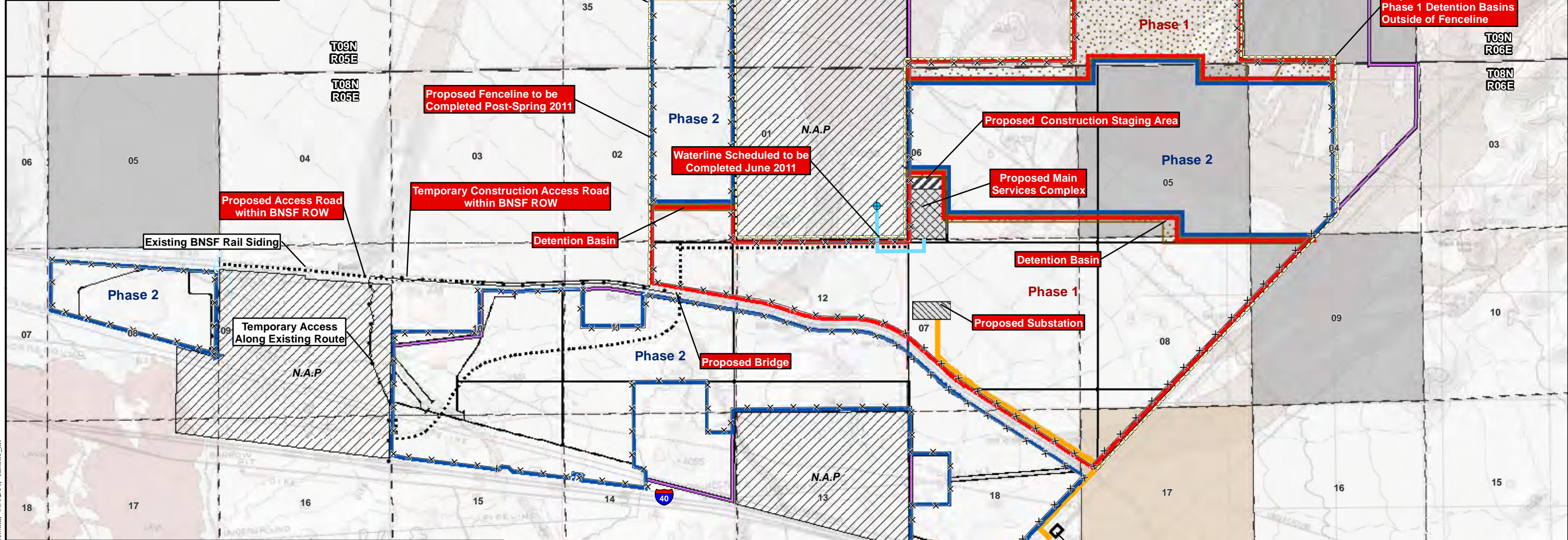
The Engineering Figure with the SunCatcher layout shows that the Applicant is able to focus development of SunCatchers and support facilities on a smaller footprint and achieve the same level of generation. This will allow the Applicant to meet the requirements of the PPA, avoid environmentally sensitive areas, reduce the loss of desert tortoise, avoid or reduce special status plants as well as pull down from the toe of the Cady Mountains as indicated. It will make construction somewhat more costly, though, given that space for lay-down and movement is more restricted. It should be noted, however, that the spacing between the SunCatchers is not being changed whatsoever.

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

Sincerely,



Felicia L. Bellows
Vice President of Development



LEGEND

- | | |
|--------------------------------------|--|
| Original Boundary (Reduced 2,015 ac) | Phase 1 Features |
| Detention Basins (545 ac) | Phase 1 (275MW Construction Area 2,327 ac) |
| N.A.P. (Not a Part) | Proposed Substation |
| Phase 2 (3,888 ac) | Proposed Construction Staging Area (9 ac) |
| Access Roads | Main Services Complex |
| Fenceline (30.4 miles) | Main Access Road (5.5 miles) |
| BLM Acquired Land | Temporary Construction Access Road (2.9 miles) |
| LWCF Acquisition | Proposed Access Road to Detention Basins |
| Township/Range Boundary | Proposed Transmission Line (1.9 miles) |
| Section | Proposed Water Line (0.51 mile) |
| | Well |

URS

SOURCES: ESRI (overview); Mortenson (project features June 2010); URS (main access rds, t-line, fenceline, May 2010); URS (well, waterline, May 2010); USGS 7.5' quads (Hector 1992, Sleeping Beauty 1993); BLM (acquired lands, Land and Water Conservation Fund, and township/range 2009).

1500 0 1500 3000 Feet

SCALE: 1" = 3000' (1:36,000)
SCALE CORRECT WHEN PRINTED AT 11X17

ALTERNATIVE #2 PROJECT LAYOUT

TOTAL PROJECT: 6215 ACRES

CALICO SOLAR

CREATED BY: CL	DATE: 06-02-10	FIG. NO:
PM: AL	PROJ. NO: 27658103.01000	1-1

Path: G:\gis\projects\1577276581\00\mxd\project_layout_DT_avoidance.mxd, 06/02/10, comille_bill

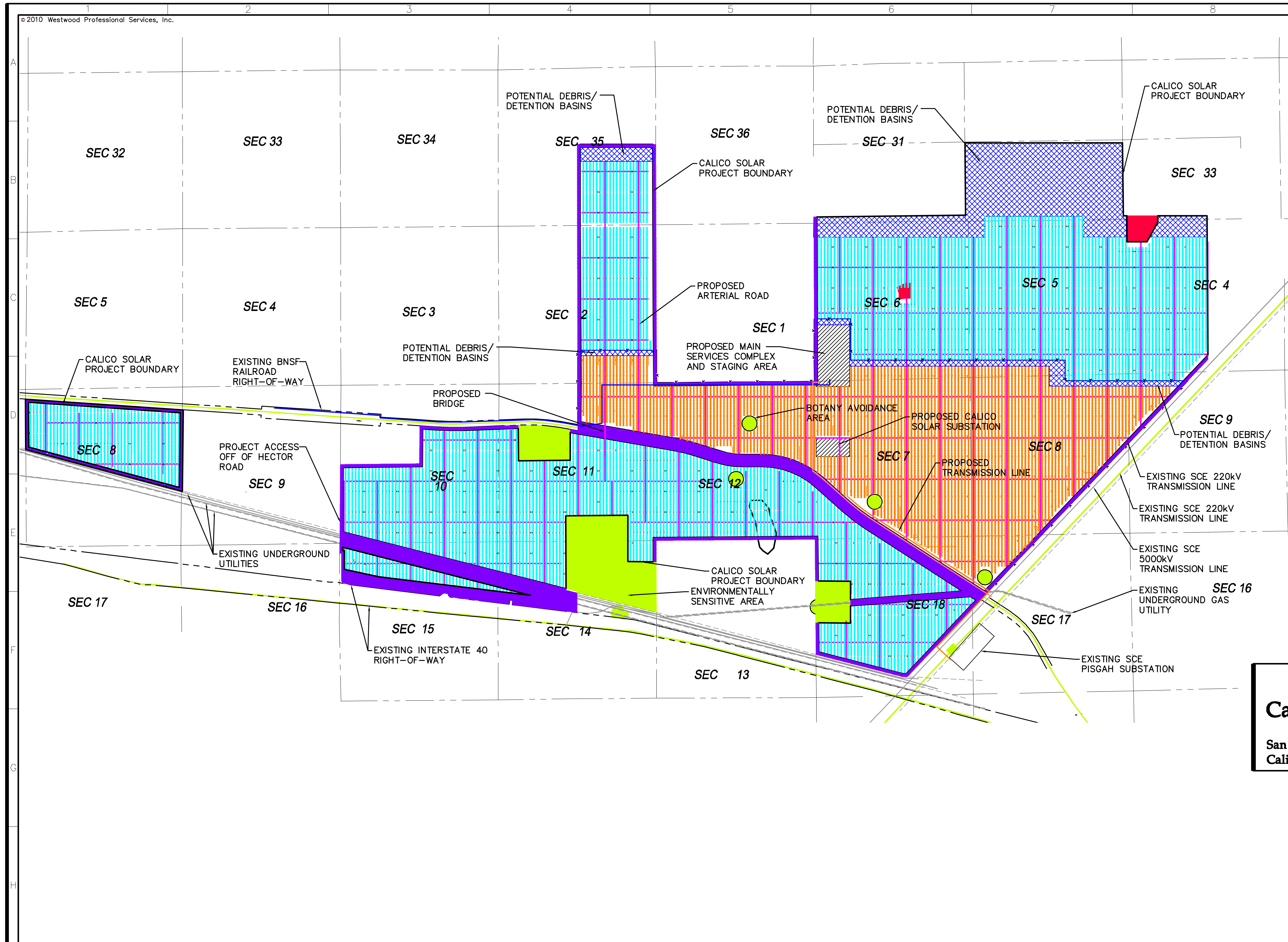
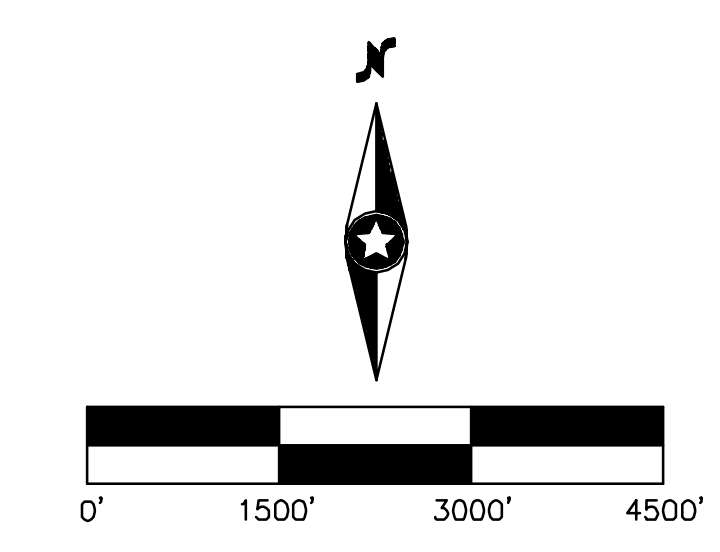
Designed:	ADC	
Checked:	DDB	
Drawn:	ADC	
Record Drawing by/date:		
Revisions:		
#	DATE	DESCRIPTION

Prepared for:

Mortenson
 construction
 700 Meadow Lane
 Minneapolis, MN 55440

LEGEND:

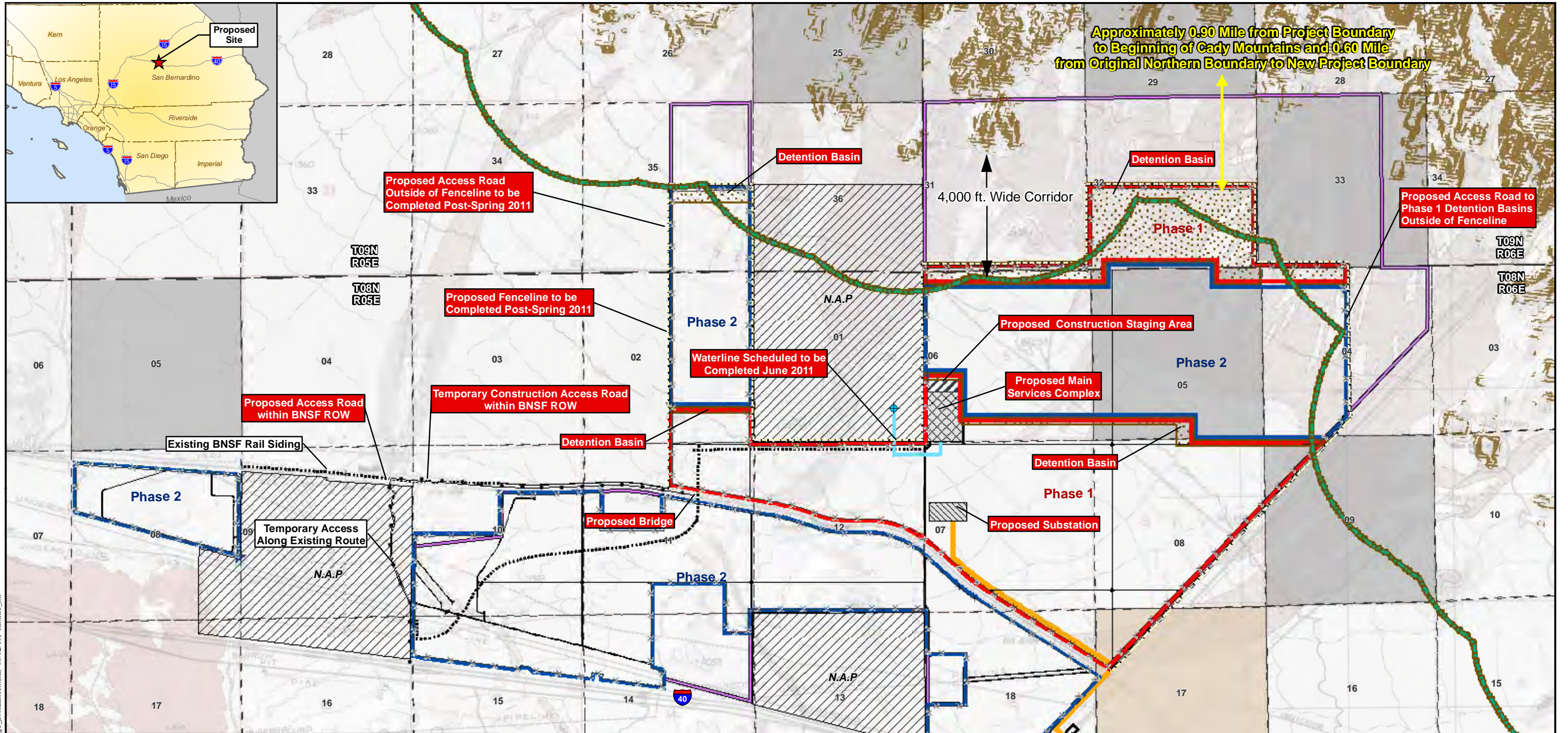
- SUNCATCHER UNIT
- ARRAY-PHASE 1
- SUNCATCHER UNIT
- ARRAY-PHASE 2
- PROPOSED PROJECT FACILITIES
- PROPOSED ARTERIAL ROAD
- POTENTIAL DEBRIS/DETENTION BASIN LOCATION
- ENVIRONMENTALLY SENSITIVE AREAS
- UNBUILDABLE AREA
- PROPERTY SETBACK ZONE
- PROPOSED WATERLINE
- PROPOSED TRANSMISSION LINE
- PROPOSED DISTRIBUTION LINE AND COMMUNICATION ROUTE



Calico Solar
 San Bernardino County,
 California

**Figure 19 -
 Site Plan**

NOT FOR CONSTRUCTION
 Solar Array:
 Suncatcher dated 05/27/10
 Date: 06/02/10
 Sheet: 1 OF 1



Approximately 0.90 Mile from Project Boundary to Beginning of Gady Mountains and 0.60 Mile from Original Northern Boundary to New Project Boundary

Proposed Access Road Outside of Fenceline to be Completed Post-Spring 2011

Detention Basin

4,000 ft. Wide Corridor

Phase 1

Proposed Access Road to Phase 1 Detention Basins Outside of Fenceline

Proposed Fenceline to be Completed Post-Spring 2011

Phase 2

Waterline Scheduled to be Completed June 2011

Proposed Construction Staging Area

Proposed Main Services Complex

Phase 2

Proposed Access Road within BNSF ROW

Temporary Construction Access Road within BNSF ROW

Detention Basin

Existing BNSF Rail Siding

Phase 2

Temporary Access Along Existing Route

Proposed Bridge

Detention Basin

Phase 1

Proposed Substation

Phase 2

Pisgah Substation

LEGEND

- 4,000 foot Corridor from Cady Mountains
 - 20 Percent Slope Cady Mountains
 - Original Boundary (Reduced 2,015 ac)
 - Detention Basins (545 ac)
 - N.A.P. (Not a Part)
 - Phase 2 (3,888 ac)
 - Access Roads
 - Fenceline (30.4 miles)
 - BLM Acquired Land
 - LWCF Acquisition
 - Township/Range Boundary
 - Section
- Phase 1 Features**
 - Phase 1 (275MW Construction Area 2,327 ac)
 - Proposed Substation
 - Proposed Construction Staging Area (9 ac)
 - Main Services Complex
 - Main Access Road (5.5 miles)
 - Temporary Construction Access Roads (2.9 miles)
 - Proposed Access Road to Detention Basins
 - Proposed Transmission Line (1.9 miles)
 - Proposed Water Line (0.51 mile)
 - Well



SOURCES: ESRI (overview);
Mortenson (project features June 2010);
URS (main access rds, t-line, fenceline, May 2010);
URS (well, waterline, May 2010);
USGS 7.5' quads (Hector 1992, Sleeping Beauty 1993);
BLM (acquired lands, Land and Water Conservation Fund, and township/range 2009).
BLM (20 percent slope, and 4,000 ft buffer 2010).

1500 0 1500 3000 Feet
SCALE: 1" = 3000' (1:36,000)
SCALE CORRECT WHEN PRINTED AT 11X17

**ALTERNATIVE #2 PROJECT LAYOUT
WITH 4,000 FOOT DESERT TORTOISE CORRIDOR
CALICO SOLAR**

CREATED BY: CL	DATE: 06-02-10	FIG. NO:
PM: AL	PROJ. NO: 27658103.01000	1-1

Path: G:\projects\1577276581\00\mxd\project_layout_DT_home_range_avoidance.mxd, 06/02/10, comille_lill



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 5/11/10)

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DECLARATION OF SERVICE

I, Jennifer Draper, declare that on June 2, 2010, I mailed hard copies of the attached Applicant's Submittal of Alternative Site Layout #2, Engineering Figure with SunCatcher Layout and Revised Project Boundary with 4000' Desert Tortoise Corridor, dated June 2, 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].

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;

 by personal delivery;

 X by delivering on this date, for mailing with the United States 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 "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. 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, 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.

original signed by

—

Jennifer Draper