

BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT COMMISSION
OF THE STATE OF CALIFORNIA

APPLICATION FOR CERTIFICATION FOR
THE BEACON SOLAR ENERGY PROJECT

DOCKET NO. 08-AFC-2

BEACON SOLAR ENERGY PROJECT'S REQUEST FOR EXTENSION
OF TIME TO RESPOND TO DATA REQUESTS

DOCKET	
08-AFC-2	
DATE	JUL 07 2008
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Beacon Solar Energy Project

Dated: July 7, 2008

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Pursuant to Title 20, California Code of Regulations, Section 1716(f), Beacon Solar, LLC ("Applicant") hereby requests an extension of the deadline for filing a response to ten of the California Energy Commission Staff ("Staff") Data Requests 1 through 70 received on June 16, 2008. Applicant requests an extension to file data responses in three technical areas. Applicant provides a delineation of the data requests and the reason for the extension in the following discussion.

Technical Area: Air Quality, Data Requests 4 - 6

Staff requested additional information to analyze the potential air quality impacts from the construction and operation of the new substation if Option 2 of the transmission line options is selected. The requested information includes all of the following:

4) Please describe the construction equipment necessary and the duration of construction equipment necessary and the duration of the construction.

5) Please quantify the expected criteria pollutant emissions from the construction equipment identified in Soils Data Request 45.

6) Please quantify and show the calculations of the sulfur hexafluoride greenhouse gas release estimates from the substation switching equipment for the case in which the new substation would be required.

Reason for Extension Request

The Applicant proposes two possible options for interconnection to the electricity transmission grid. One connects to an existing substation, while the other involves the construction of a new substation/switchyard. The Applicant is in the process of purchasing the

property or obtaining rights-of-way for the option that would not require the new switchyard. The availability of one of the properties needed for this transmission line route is expected to be resolved favorably in July 2008. Thus, we are requesting additional time to provide the information related to the new switchyard as choosing the option of connecting to an existing substation will render these data requests moot. If the option to be constructed cannot be determined until later, then Applicant will provide the requested data in September 2008.

Technical Area: Cultural Resources, Data Requests 30, 32, and 34

Staff requested additional information regarding Register-eligible prehistoric site components and historic geomorphology. The requested information includes the following:

30) To enable staff to complete its review of the project's potential to affect California Register-eligible prehistoric site components, please provide the results of the excavation program agreed to on February 28, 2008 (February 2008 Report of Conversation, TN 46670).

32) To enable staff to complete its review of the project's potential to affect California Register-eligible historic site components, please provide the results of the excavation program agreed upon on February 28, 2008.

34) Please provide a discussion of the historical geomorphology of the project site to better evidence a consideration of the potential there for buried archaeological deposits. The discussion should describe the development of the alluvial landforms and the lake bed deposits on which the project area is proposed with a focus on the character of local depositional regimes since the Late Pleistocene era. The basis for the discussion should be data on the geomorphology, sedimentology, pedology, and stratigraphy of the project area or the near vicinity. The source of these data may be a combination, as necessary, of extant literature or primary field research.

Reason for Extension Request

Regarding data requests 30 and 32, the Applicant's cultural resources consultant, EDAW, had questions related to the excavation program. EDAW representatives met with cultural resources Staff and Staff consultants on June 11, 2008, and obtained the information needed to refine the proposed program. Applicant requests an extension for the submittal of the results of these excavations until late September 2008 in order to conduct the field investigations and

analyses, and prepare a technical report incorporating the guidance recently received from the CEC Staff.

Regarding data request 34, the Applicant has commissioned a study by Kleinfelder to provide additional information on the geomorphology of the Project site. The Applicant requests an additional 30 days (until August 15, 2008) to complete and provide the results of this study.

Technical Area: Transmission System Engineering, Data Requests 50 - 53

Staff has requested additional transmission interconnection information including the system impact study (SIS). The requested information includes the following:

50) Please submit a complete SIS report in coordination with LADWP, SCE, and approved by the California ISO, for interconnection of the Beacon project at a nominal output of 250MW. The study should include a power flow, short circuit, and transient stability analyses with a mitigation plan for any identified reliability criteria violations. In the report, list all major assumptions in the base cases including major path flows, major generations including queue generation, and loads in the area systems. Also identify the reliability and planning criteria utilized to determine the reliability criteria violations.

51) Please provide power flow diagrams with and without the Beacon project for base cases. Power flow diagrams should also be provided for all overloads or voltage criteria violations under normal system (N-0) or contingency (N-1 & N-2) conditions.

52) Please provide electronic copies of *.sav, *.dyd, and *.swt GE PSLF files and EPCL contingency files in a CD (if available).

53) Please provide the expected date, after contacting the California ISO, when the final interconnection approval letter from the California ISO would be issued.

Reason for Extension Request

Applicant has received a draft SIS from Los Angeles Department of Water and Power (LADWP). Applicant is working with LADWP to create a final version of the SIS. The Applicant will meet with LADWP on July 8, 2008 to review outstanding issues. Applicant expects to receive a final version shortly thereafter and will keep Staff informed of the timing. The items requested in data requests 50 and 51 will be included in the SIS Report and will be provided to the CEC when it is available. The Applicant is uncertain whether the electronic files requested in data request 52 will be provided by LADWP, but these files will be requested and provided to the CEC if they are provided by LADWP.

Regarding data request 53, the Applicant will not obtain an interconnection approval letter from the California ISO. The Interconnection Request and SIS for the Project are with LADWP who operates their own control area and is not a member of the California ISO.

Except for the foregoing requests for extensions, Applicant will provide the requested information in electronic format on or before July 16, 2008.

Respectfully,


Jane E. Luckhardt
Downey, Brand LLP
Attorneys for Applicant

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PROOF OF SERVICE
(Revised 6/23/08)

INSTRUCTIONS: All parties shall either (1) send an original signed document plus 12 copies or (2) mail one original signed copy AND e-mail the document to the address for the docket as shown below, AND (3) all parties shall also send a printed or electronic copy of the document, which includes a proof of service declaration to each of the individuals on the proof of service list shown below:

CALIFORNIA ENERGY COMMISSION
Attn: Docket No. 08-AFC-2
1516 Ninth Street, MS-14
Sacramento, CA 95814-5512
docket@energy.state.ca.us

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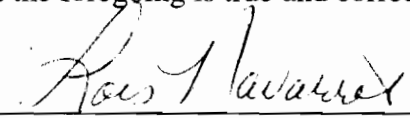
DECLARATION OF SERVICE

I, Lois Navarrot, declare that on July 7, 2008, I deposited copies of the attached **BEACON SOLAR ENERGY PROJECT'S REQUEST FOR EXTENSION OF TIME TO RESPOND TO DATA REQUESTS** in the United States mail at Sacramento, California with first-class postage thereon fully prepaid and addressed to those identified on the Proof of Service list above.

OR

Transmission via electronic mail was consistent with the requirements of the California Code of Regulations, title 20, sections 1209, 1209.5 and 1210. All electronic copies were sent to all those identified on the Proof of Service list above.

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



 Lois Navarrot