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SUBJECT: PUBLIC INPUT AND COMMENTS ON SES SOLAR TWO (08-AFC-5)

Since the main thrust for the permitting of this project seems to be directed at environmental, cultural and land use issues, I will address my concerns here with follow-up on the reason for these concerns based on the non viability of implementing this mega scale project as proposed by SES. Please enter these concerns with their backup information as public inputs to be addressed by the California Energy Commission.

1. Since thousands of acres of public land are going to be dedicated to this solar energy project, what are the implications of taxpayer responsibility for SunCatchers removal and remediation of the land should a failure of the technology implementation occur? Such a cleanup effort even in the first phase would cost hundreds of millions of dollars, while SES Solar Two, LLC would declare bankruptcy and abandon the site.

2. As I understand it, the justification for the Southwest Power Link is to carry several hundreds of MW from the SES Solar Two Project to the San Diego region. If SES Solar Two fails, as it now stands Sempra Energy is under no commitment to carry other renewable energy sources and is free to carry energy from coal or gas fired plants in Mexico. This appears to have been an ulterior motive in Sempra's pushing for the Southwest corridor while demanding approval without a definite commitment to use this line for renewable sources of energy.

#### PROBLEMS FACING SUCCESSFUL IMPLEMENTATION OF SES SOLAR TWO "SUNCATCHERS"

1. Stirling Cycle engines have been around for something like 175 years with only a few actually placed in useful operation. The concept is proven, the realization isn't!
2. Philips, auto manufacturers and others have spent millions of dollars trying to adapt Stirling Cycle engines for commercial markets, but without success.
3. SES Solar Two engines operate at very high temperatures, pressures and rotary speeds using hydrogen gas as the transfer medium, all creating long term problems with metal creep, metal fatigue and seal integrity.
4. The SunCatchers have not been tested in the actual harsh environment of the desert with only six units being run by Sandia Labs at their Albuquerque, NM site, with a few others being run by Boeing in the Los Angeles area.
5. As I understand the status of the SunCatchers, the final design is nearing completion with release in early 2009. So none of these units has been built yet, and certainly will not be tested until late in 2009. How can any rational decision be made at this time to site 12,000-30,000 of these units on public land based on current evaluation data?

6. I do not know of any other successful project of this magnitude that has advanced from several units to tens of thousands of units in a single step.

#### PLAN FOR SUCCESSFUL IMPLEMENTATION OF SES SUNCATCHERS

1. Permit SES Solar Two, LLC to construct and test a 1 MW setup comprising 40 SunCatchers on their privately held lands near Plaster City, CA. Run these units for six months to a year, tabulating collected energy, operational availability and operating costs to determine project viability before proceeding to a larger model to be sited on public lands.
2. This approach will in the long run be beneficial to both the U.S. taxpayer and to SES Solar Two, LLC.
3. Defer construction of the Southwest Power Link until a legitimate need is established for its use based on bringing renewable energy from Imperial County to San Diego..

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