

DOCKET**08-AFC-5**DATE JAN 02 2008RECD. JAN 05 2008

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California Energy Commission
Christopher Meyer, Project Manager
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January 2, 2009

SCOPING COMMENTS: SES SOLAR TWO PROJECT, DOCKET NO. 08-AFC-5

Dear Mr. Meyer,

For the record, I have attended the July 24, 2008 Imperial County Planning and Development Services Pre-Application Meeting for Stirling Energy Systems, the November 24th CEC/BLM Informational Hearing and Scoping Meeting and site-visit, and the December 18th CEC/BLM Data Response and Issues Resolution Workshop and Scoping meeting. SES/URS also provided me with a DVD and hard copy of the Response to CEC & BLM Data Requests 1-52. As requested at the December 18th meeting, these comments are being sent directly to you and not to the BLM. Even though I am an elected land use representative for the rural Eastern San Diego County community of Boulevard, and the President of the public benefit non-profit group, Backcountry Against Dumps, these comments are my own. I am a property owner and taxpayer in both San Diego and Imperial Counties and a ratepayer that will be impacted by the massive and wrong headed SES Solar Two Project, the Sunrise Powerlink (deemed unnecessary and too environmentally and fiscally expensive by the CPUC's assigned Administrative Law Judge), Iberdrola Renewables 200 MW Tule Wind Project on approximately 20,000 acres of BLM land in Boulevard's McCain Valley Land Cooperative and Wildlife Management Area, and other questionable industrial scale renewable energy projects and related infrastructure—if they manage to come to fruition.

Large scale urban PV is more cost effective than remote solar and wind projects and the related Sunrise Powerlink

The CEC and BLM should reject the Solar Two Project and other such controversial behemoths as they do not represent the best and highest use of our public lands or the best interest of ratepayers and tax payers who will be forced to bear the economic burden of the resulting exorbitant rate increases and inflated taxpayer funded subsidies—not to mention the extensive and cumulative loss of use of our public lands and recreation areas to unnecessary energy and transmission projects. It is especially troubling and irksome when foreign entities will be reaping the rewards at our expense, with much of that tax and rate payer funded booty being spent outside the US and very little being spent within the impacted communities.

On-site and close to point of use renewable energy projects are far less destructive, expensive, and time consuming in regards to approval and litigation, and they do not require the destruction of public lands or extensive and vulnerable transmission lines. Bill Powers, PE, Powers Engineering, an intervener in the CPUC/BLM CPCN case for the Sunrise Powerlink (App. 06-08-010) provided some compelling research and backup documentation in a December 12, 2008 Ex Parte Communication. Powers' research shows that it would be cheaper to build 1,000 MW AC of thin-film PV in the urban core than to build the 1,000 MW Sunrise Powerlink. With a few adjustments, the same applies to the \$1.4 billion 750 MW SES Solar Two Project, especially when you add in the projected \$1.9 billion cost of Sunrise Powerlink and the necessary IV Substation upgrades and expansions for both Phase I and II of Solar Two. I have attached the 44-page Powers Ex Parte Communication (12-12-08) and hereby incorporate his information into the record.

I am also incorporating, by reference, the entire record for the Sunrise Powerlink case noted above, and all of the commentary, criticism, research and testimony that relates to the SES Solar Two Project contained within that record. That extensive record includes much more from Bill Powers along with especially relevant comments from the Utilities Consumer Action Network (UCAN), the Conservation Groups (CBD & Sierra Club) represented by attorney Steven Siegel, and all of their witnesses. I also hereby incorporate by reference Bill Powers Smart Energy 2020 plan (October 2007) which is also part of the Sunrise Powerlink CPUC/BLM project record. UCAN has already announced that they will appeal the CPUC's controversial December 18th approval of the Sunrise Powerlink using the extensive record and the Assigned ALJ's denial of the project based on that record. A similar suit is expected from the Conservation Groups.

SES's troubling responses to questions about their Solar Two Project

During the bus ride for the November 24th Solar Two Project site visit, SES's Robert Liden provided the following answers to questions posed by myself and others:

- Stirling Energy Systems has just \$100 million of the \$1.4 billion needed for the Solar Two Project.
(NTR is proposing to invest another \$100 million but that is still a mere fraction of what is needed)
- Equity funding is for the pilot project and manufacturing only. Their Imperial Valley Solar Two project is not funded.
- The 5-year accelerated depreciation rate is attractive to investors as are the renewable energy credits. Yet, when they talked to investors in San Diego prior to the November 24th hearing, none signed on.
- The SES solar engines are still in the research and development stage and they are *looking at* federal loan guarantees for innovative renewable energy concepts.

- SES will be adding another 4 *hand made* units at Sandia Labs to incorporate some changes in engineering needed for mass production. Their 6 existing units were installed at Sandia 3 years ago.
- They are still working with a Michigan plant on potential manufacturing of the solar engines. (An article in the San Diego UT on 12-14-08, reported that SES plans to have Linamar, a Canadian automotive products company produce the first engine mid-January, test it, and then enter full production by the end of next year).
- They may have a portable factory on-site for assembly of Sun Catcher units. (If so, where will it be located, how big will it be, and what are the impacts associated with that facility?)
- In response to a direct question about how they will deal with and mitigate the fact that the BLM project site is currently designated as a Limited Use (protected) Area with traffic restricted to the few existing routes of travel, *Liden ignorantly stated that the Limited Use designation meant the land had limited uses and was not good for much.* A corporate executive, looking for public support and the virtual gift of 10-square miles of public land, should have better knowledge of and respect for the land that belongs to the American people.
- They had to move their Solar Two Project boundaries due to significant cultural and historic resources and more may be found. (most associated with the Ancient Lake Cahuilla shoreline, artifacts, cremation sites, and sacrifice areas as noted by Carmen Lucas and the archeologist with Imperial Valley Museum).
- The entire project perimeter area (10-square miles) will be fenced off, as phases progress. OHV trails will be closed and motion activated lighting will be installed. (These impacts, alone, are significant and will completely alter the existing character and appeal of the desert landscape and habitat.)
- The SunCatcher units reportedly close automatically when winds exceed 35 mph. So, where are the onsite anemometers (MET towers)? It generally takes a minimum of three years to properly analyze the average wind speed and the frequency and intensity of wind storms. To a rational person, legitimate site specific wind information would seem to be necessary in order to determine the amount of down time for the SunCatcher units related to wind and dust storm events. Too much wind would translate into too much down time, the potential for sand damaged equipment (mirrors, gears and engines), and reduced power generation—all critical information.

Transmission / Sunrise Powerlink / IV Substation connection Phase I and II

During the same site visit bus trip, Liden provided the following information in response to

questions:

- The Solar Two Project is # 1 in the CALISO queue to connect to the Imperial Valley Substation for the 300 MW proposed for Phase I.
- Several hundred million dollars will be needed to upgrade the IV Substation for Phase I.
- For the 450 MW Phase II, they are # 4 in the CALISO queue for the inter-tie to the proposed IV Substation expansion and the yet-to-be-built Sunrise Powerlink transmission line.

The three big transmission questions are:

- Is there really any remaining capacity on the existing Southwest Powerlink to accommodate the proposed 300 MW of Phase I of Solar Two, beyond the current 80 MW of capacity reported by CALISO and as claimed by Sempra Energy in their April 2008 amendment to their DOE Presidential Permit Application (PP-334) for a new 500 kV transmission line at Jacumba in Eastern San Diego County? Sempra alleges that their new cross-border line is needed to accommodate their 1,250 MW La Rumorosa Wind project, and to connect it to the Sunrise Powerlink. The La Rumorosa project has also been referred to as Baja Wind and more recently as Energia Sierra Juarez. (See Sempra project information at: <http://www.semprageneration.com/esj.htm>).
- What are projects # 1, 2 & 3, which are ahead of Solar Two Phase II, in queue for the expanded IV Substation and Sunrise Powerlink transmission project, and what capacity, if any, will be left on the Sunrise Powerlink for the proposed 450 MW of Phase II of Solar Two?
- What are the alternative means of transmission in the event there is no available capacity on the existing Southwest Powerlink for Phase I, and /or legal challenges overturn the CPUC approval of SDG&E's highly controversial Sunrise Powerlink project?

American and local jobs

SES representatives repeatedly use the lure of jobs for American and Imperial Valley workers as a reason to approve their Solar Two project. At public hearings in the Valley they talk about all the green collar jobs that will be generated. Unfortunately, the reality will be the importation of already trained workers from elsewhere in the country with very few high paying jobs going to local Valley workers. There is also the very real potential for skilled and unskilled Green Card workers to be brought in from both Mexico and foreign countries to fill the few jobs that will be available. SES has also promoted the project by talking about the American auto workers that will be put back to work building Stirling Solar engines, *but* the San Diego UT just reported their deal with Linamar, a *Canadian* automotive products company.

Visual Resources

It was reported that there will be virtually no reflection impacts to passing motorists on I-8 and Navy, US Border Patrol, other air traffic flying in the designated corridor overhead, from the 30,000 mirrored dishes as all light will be deflected. Pilots will reportedly see a gray area. This is rather hard to believe and needs to be verified, especially with the number of potentially impacted drivers on both east and west bound I-8, Dunaway Road, and Evan Hews Hwy, along with the heavy air traffic associated with the Navy Air Station located several miles to the east at Seeley, and the frequent low level Border Patrol helicopter and other Homeland Security related flights in the area.

The complete landscape and character alteration that this project represents is significant, massive and cumulative in nature all on its own. The impacts are off the charts when you add in the many other projects that will be highly visible in the same area like Iberdrola Renewables 200 MW Tule Wind project on approximately 20,000 BLM acres located on the ridgeline to the west, Greenhunter Wind Energy LLC (formerly Windhunter) on their 6,250 acres of BLM land just west of Solar Two, and pending applications for up to 5 more MET towers, in the same general area, with potential industrial wind turbine projects to follow, as noted by BLM in their November 2008 FONSI and Decision Record for Greenhunter's 197 foot tall MET Tower ROW.

Add in Sempra's Energia Sierra Juarez (AKA La Rumorosa Wind and Baja Wind) which will cover approximately 60 miles of highly visible ridgeline to the southwest starting at the US Mexico border and Imperial County line, and the Union Fenosa's Zemer Energia's 1,000 MW wind energy project, proposed for the same highly visible La Rumorosa area, with the first 500 MW planned for export to the US via the Imperial Valley Substation and local transmission lines. The attached December 9, 2008 'Motion of Zemer Energia for Party Status' in the CPUC/BLM Sunrise Powerlink proceedings confirms their intent and the fact that they have paid their fees to CALISO. Their motion was granted.

Wind-Zero, another highly visible large-scale community character altering project is proposed on about 1,000 acres of private land between Solar Two and the communities of NoMirage and Ocotillo to the west

Go to pages 17 & 18 of Sempra's September 18, 2008 Power Point presentation link below, which includes maps and references to the 60 miles of Sierra Juarez (La Rumorosa) ridgeline where Sempra and the Union plan to install industrial scale turbines over 400 feet tall:

<http://www.heco.com/vcmcontent/EnergyServices/EnergyExpo/2008Presentations/AllmanAndGviles.pdf>

For Greenhunter location details, maps and aerial photos go to:
<http://www.blm.gov/pgdata/etc/medialib/blm/ca/pdf/elcentro/nepa/2005.Par.11648.File.dat/FONSI DR EA GreenHunter.pdf>

Cultural Resources

Carmen Lucas, a well respected Native American of Kumeyaay decent, spoke passionately about the extensive and highly valued cultural resources placed at risk by the Stirling Solar Two project. Lucas said that she was there at the request of the State Office of Heritage Protection. An archeologist with the Imperial Valley College museum also spoke about significant concerns with the cultural and historical resources at risk and the viability of the project site. When you add the impacts from this one project to all the other proposed and existing projects and the approved and illegal uses, in the El Centro Field Office planning area, the CDCA, and other BLM lands in the region, especially for so-called renewable energy and transmission projects, the cumulative impacts are massive and virtually incalculable.

Air Quality Impacts / Dust & Fugitive emissions / Cumulative impacts

The 10-square mile project site and the extent of disturbance to fragile, fine, and sandy desert soils, and the need to run back and forth in vehicles to repeatedly wash the mirrors on 30,000 SunCatcher units, the potential on-site generation and leakage of hydrogen gas, diesel trucks and trains used to deliver equipment, all represent an increased threat of negative impacts to air quality. Add to that the industrial mining and plaster board processing plant at Plaster City, idling diesel train engines and truck, sand mine truck traffic from multiple operations in the area, Plaster City OHV Park and the related OHV traffic and activities, and you have a major problem. It is important to note that disturbed desert soils no longer serve as a carbon sink.

Water Resources / flood plains / Erosion control

SES keeps talking about using approximately 32 acre feet per year of IID water for their project but it is unclear if an agreement has been formally secured and what amount of water delivery is guaranteed over the life of the project. Various maps show numerous channels, desert washes, and flood plains through out the project area. Along with concerns for any alterations of the natural flow patterns on wildlife, habitat and groundwater recharge, there are concerns with the potential for inundation of numerous SunCatchers, and on-site infrastructure during El Nino years and significant storm events like Hurricane Kathleen that roared through the area (1977-78?). I experienced that hurricane first hand. It washed out sections of I-8, the rail road, and a wide swath of the community of Ocotillo all near the Solar Two project area. Several maps provided in the Response to CEC/BLM Data Requests 1-52 show numerous Suncatchers, roads, and more, situated within the identified flood plains. Maps also show “debris basins” located in flood plains. All floodplains and natural drainage channels and washes should be off-limits for any project related installations or alterations. Don’t ever underestimate the amount of water that flows in the desert and the destruction it can cause. There are also concerns with the lack of detailed information on the evaporation ponds and the chemical make up and ultimate disposal destination of the resulting waste.

Loss of Use /Quiet enjoyment and recreation/ OHV

The cumulative scale and scope of the loss of use, the loss of recreational opportunities, and the quiet enjoyment of our public lands when millions of acres are practically given away, fenced off, altered and transformed into private profit factories, is virtually off the charts and totally unconscionable. This also applies to the loss of and intrusion into designated OHV parks and routes.

Significant and Cumulative Impacts

Multiple renewable energy, transmission, and other projects, including SES Solar Two, high profile industrial wind turbines over 40 stories tall along western ridgelines on both sides of the US/Mexico border, and more potential wind turbines on BLM lands between Solar Two and the more elevated ridgeline projects, transmission and related infrastructure for renewable energy projects, mining projects, quasi military projects, and more, are currently proposed for over 2 million acres of BLM lands in the California Desert District and Eastern San Diego County, some private lands, and hundreds of thousands of acres in Northern Baja, mostly on communal Ejido lands. Separately and together, these projects will result in the following significant and cumulative impacts and more:

- Community Character and Values
- Loss of recreational and public use
- Loss of quiet enjoyment and sense of time and space
- Industrialization of rural communities and open spaces
- Loss of and damage to Cultural and Historical Resources
- Staggering Visual Resource and skylining impacts
- Landscape transformations and alterations
- Wildlife
- Habitat fragmentation and destruction
- Air quality, dust, and fugitive emissions
- Loss of dark skies (light pollution) and scientific resource value
- Increased traffic during construction, operation and maintenance
- Water resources including groundwater, imported water, and recycled water
- Increase soil erosion
- Diverted and denied recharge to fragile aquifers and sensitive habitat
- Disproportionate social and economic burdens to rural and low-income communities
- Environmental Justice issues
- Loss of carbon sink value of undisturbed desert soils
- Green House Gas emissions from increased project activities and manufacturing processes
- Infrastructure
- Traffic
- Utility rates
- Property Values
- Eminent Domain

BLM Land Appraisal /Rent monies paid to BLM / What are local benefits from rent payments

The appraisal of the BLM land to be used for this project needs to be an open and transparent process, with documents and assessments included in the public review process. The land value needs to include the project sites readily available access to utility transmission lines (both low and high-voltage) and substations, public roads and interstate highway, active rail line access, access to imported water from IID through a minimal pipeline extension (7 miles) from the West Side Main canal, existing industrial uses, US Gypsum's Plaster City, on adjacent land. All of these aspects

make the proposed land much more valuable than other more remote public lands. The lease price should properly reflect those values. What amount of rent money paid to BLM will go to benefit the local BLM lands and /or impacted communities? Or, will all the money go to the general fund as the community of Boulevard was informed when similar questions were asked about the rent monies from Iberdrola's proposed Tule Wind project on BLM land?

Bonding and decommissioning

I agree with the CEC and BLM staff concerns regarding the lack of adequate SES planning and response to questions regarding the funding for decommissioning the project site in the event of bankruptcy or other form of abandonment by the Applicant/Investors. The recent crash in prices for scrap metal and other commodities is part of the cyclical rise and fall of prices over time, and cannot be counted on to pay for the costs of decommissioning, or even to defray the costs. A legitimate and binding bond needs to be secured prior to any project approval or commencement of project activities that will cover any and all decommissioning costs. The tax payers do not need to foot yet another bill for this or any other projects built on public land.

A Better Way

There are far better ways to provide reliable renewable energy at or close to the point of use without this invasive and expensive 10-square mile project and the related and litigious Sunrise Powerlink transmission project. In addition to the previous information provided, please see the attached well researched article "The Better Way" by the Alliance for Responsible Energy Policy. It includes a comparison chart showing the disparity for impacts of point of use renewables and industrial scale wind and solar projects. There is more good information at their website at www.allianceforresponsiblenergypolicy.com.

December 5th an article was printed in the San Diego Union Tribune regarding the City of San Diego's proposal to allow residents to pay for solar panels through their property tax bills over 20 years (http://www.signonsandiego.com/uniontrib/20081013/news_1n13solar.html). The County of San Diego is considering the same policy. The County also recently supported pursuit of state legislation for feed-in-tariffs for small generators. The Imperial County and IID can and should follow the same path to renewable energy production and independence.

The combination of the new 30% tax credit, being able to pay for solar panels through our property taxes, and the potential to get paid for excess self-generated energy, which is now donated back to the utilities, is the bright future we prefer. This will allow the average citizen, school, church, small businesses, and others to become part of the solution instead of being part of the problem. If feed-in-tariffs are approved (like we enjoyed in the 80's before the utilities killed them), it will also provide a further incentive for us to install a larger solar system than our home or business needs and to conserve energy so that more will be available to sell back to the grid. This scenario could represent the jump start to the real green energy future and green jobs that most people prefer, once they are provided with the facts and the opportunities. It can also help generate much needed extra income for families, communities, and organizations during these difficult economic times.

Conclusion

The rush to embrace massive and unnecessary projects like Stirling Energy Systems Solar Two, the Sunrise Powerlink, Iberdrola Renewables Tule Wind project, Sempra's La Rumorosa Wind project (in Mexico), and others throughout the region, should be compared to the rush to deregulate the energy market, to promote massive Ethanol production from corn, and to add MTBE to our gasoline which contaminated groundwater resources. All of these poorly vetted decisions resulted in incredibly expensive debacles with far reaching and unintended consequences that even the best minds have struggled and failed to fix. The old saying '*act in haste and repent at leisure*' applies to this and other decisions before you. Please deny the Application for Certification, for SES Solar Two. This very controversial project represents yet another incredibly expensive debacle with far reaching and unintended consequences. Now is not the time to further burden struggling ratepayers with billions of dollars that will be paid for through massive rate increases—there is a *better way*, and we are counting on you to help us get there.

Sincerely,

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Attachments:
Bill Powers Ex-Parte Communication 12-08
Motion of Zemer Energia for Party Status 12-9-08

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

In the matter of the Application of
San Diego Gas & Electric Company (U 902-E)
for a Certificate of Public Convenience and
Necessity for the Sunrise Powerlink
Transmission Project

Application 06-08-010
(Filed August 4, 2006)

**POWERS ENGINEERING NOTICE OF EX PARTE COMMUNICATION
-LATE FILING-**

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September 10, 2008

POWERS ENGINEERING NOTICE OF EX PARTE COMMUNICATION

On September 4, 2008, from 10 to 11 am at the offices of Powers Engineering in San Diego, Bill Powers, P.E., principal, Powers Engineering, met with Thomas Del Monte, intern to Commissioner Bohn. Communication was oral and written.

Mr. Powers addressed the rapid evolution of thin-film PV and the fact that thin-film PV is now demonstrably the lowest cost, on a \$/MWh basis, of any commercially available solar energy technology. He noted that Sempra Energy had announced plans to install 100s of MW of thin-film PV at its power plants in Nevada and Arizona. He also addressed the pre-commercial nature of dish Stirling technology. Mr. Powers expressed the opinion that the considerably higher \$/kWh rate by the utilities for on-peak point-of-use PV compared to the market price referent (MPR), and the: 1) lack of need in urban/suburban locations for new transmission to serve this generation, 2) lack of significant T&D losses, up to 14% at peak, associated with remote generation, 3) the presumed CEQA exemption for PV arrays on existing rooftops and in existing parking areas, and 4) the lack of need to dedicate any new urban or suburban land to develop the PV capacity (as it would on existing rooftops and parking areas), makes saturation deployment of PV in the urban/suburban core the most financially sound strategy for PV development, not large-scale development of PV (or any other solar technology) at remote sites dependent on new transmission to serve load centers. Mr. Powers also provided Mr. Del Monte with the following documents:

1. June 26, 2008 ex parte meeting notification of meeting between Bill Powers and Commissioner Bohn staff in San Francisco (with attachments). This notification with attachments was served on all parties to the A.06-08-010 proceeding on June 26, 2008.
2. June 27, 2008 ex parte meeting notification of meeting between Bill Powers and Commissioner Bohn staff in San Francisco. This notification includes additional documents provided to Commissioner Bohn staff at the ex parte meeting. attachments). This notification with attachments was served on all parties to the A.06-08-010 proceeding on June 27, 2008.

3. August 11, 2008 UCAN protest submitted in proceeding A.08-07-017, Application of San Diego Gas & Electric Company (U 902 E) for Approval of the SDG&E Solar Energy Project.
4. June 1, 2007 A.06-08-010 Phase I direct testimony of Dr. Barry Butler.
5. E-mail print-out summarizing Sempra Energy plans to add 100s of MW of thin-film PV at Sempra power plants in Nevada and Arizona, and Renewable Energy World August 20, 2008 article titled “Creating Realistic Expectations for Renewable Energy”. The article includes a case study of dish Stirling solar technology.
6. Summary of transmission capacity serving California and U.S. and California transmission maps.
7. Sept. 4, 2008 e-mail from Bill Powers to Thomas Del Monte with links to the Renewable Energy Transmission Initiative draft Phase 1B report and the 2007 Integrated Energy Policy Report.

The last three documents are included as attachments to this notice. In addition, Mr. Powers committed to provided Mr. Del Monte with a hardcopy of *San Diego Smart Energy 2020*. *San Diego Smart Energy 2020* describes a distributed generation alternative to the Sunrise Powerlink and is a part of the A.06-08-010 record.

For a copy of this notice, please contact Bill Powers, P.E. at (619) 295-2072 or by e-mail at bpowers@powersengineering.com.

Respectfully submitted,

/s/ _____

Dated: September 10, 2008

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing ex parte notification on all parties identified in A.06-08-010 on the attached service list by electronic mail and to the assigned Commissioner(s) and Administrative Law Judge(s). Dated at San Diego, California, this 10th day of September, 2008.

Respectfully submitted,

/s/

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SDG&E parent Sempra just committed to a legitimately low-cost commercially proven solar technology, 10 MW of First Solar thin-film PV at the Boulder City, NV site of Sempra's 480 MW El Dorado combined-cycle plant. The project is supposed to be operational by the end of the year. Sempra says it will add 40 to 50 MW of thin-film PV to the project next year. Sempra criticizes solar thermal in the attached Reuters article, saying thin-film PV is the way to go. Sempra indicates it also wants to build 300 to 400 MW of thin-film PV in Arizona. There is no mention of dish Stirling anywhere in the article.

SDG&E says it will add 35 MW of high cost tracking PV in the San Diego area over 5 years under the solar project the company proposed to the CPUC in July 2008. Why is SDG&E implying it is a stretch to add 6 or 7 MW of PV per year when parent Sempra is committing to 10x as much solar per year now at one site using a much lower cost PV technology (fixed plate thin-film PV)? The 300 to 400 MW of thin-film PV in Arizona mentioned by Sempra implies the company sees no hurdles to installing cost-effective PV at a rate of 100s of MW per year.

Sempra also states there is a land rush going on and it is getting tougher to find good sites on transmission lines. What Sempra does not say is that there is an almost unlimited amount of disturbed land, aka commercial rooftops and parking lots, in California and Arizona urban areas where thin-film PV could be sited with no transmission requirements and no land acquisition costs (or CEQA issues) along the lines of the SCE commercial rooftop PV project in San Bernardino and Riverside.

I know I have already sent this, but it is a wonderful juxtaposition to Sempra's born-again commitment to thin-film PV as the solar energy technology of choice. About the last quarter of the Renewable Energy World article (link below) looks at SES dish Stirling as a company creating unrealistic expectations based on untested assumptions about cost and performance.

Bill

RenewableEnergyWorld.com

<http://www.renewableenergyworld.com/rea/news/story?id=53361>

Creating Realistic Expectations for Renewable Energy

by Stephen Lacey, Staff Writer

August 20, 2008 - New Hampshire, United States

It's a delicate time for the renewable energy industry. Now that the public eye is focused more intensely on clean energy technologies, there are a lot of high expectations about their potential. Properly educating consumers, investors and journalists about what each technology can realistically offer will be one of the most important factors in moving renewables forward, say industry professionals.

At the consumer level, that means encouraging buyers to do the necessary research about the product they're purchasing and the company they're working with. If buyers don't really know what they are getting, that could make for a less-than-satisfactory experience < or even worse, a situation where the customer gets scammed.

Sue Kateley, Executive Director of the California Solar Energy Industries Association, says she sees a growing number of scammers getting into the solar industry who are making overblown claims about energy output and estimated return on investment. In the last few months, she has received three different calls from consumers in California who had large deposits taken from them by sketchy installers who made promises they couldn't deliver.

In two cases, customers put down US \$40,000 for a deposit and never got the system installed. In one case, a customer put down US \$105,840 for a deposit on a system even though they were unsure about the relationship. By the time they had second thoughts about the installer, the contract was signed and the check was cashed.

"In doing some further investigation, it doesn't really look like these are solar companies. It looks like these are opportunists...that are setting up websites and opening an office...and they're just going around and taking advantage of unsuspecting people," says Kateley.

With aggressive solar targets and a robust incentive structure in California, scammers see a big opportunity to take advantage of uneducated consumers, she says. And as other states continue to increase their support for solar, the problem will undoubtedly spread to other states. The only way to stop this from happening, says Kateley, is to teach people how to make smart decisions when purchasing solar or other renewables. That means knowing how to find a licensed contractor, understanding what's in a contract, and most importantly, knowing how solar works.

"I think that anytime you have a lot of government and public attention on going green, people don't know really what that means. And since customers don't tend to do a lot of due diligence themselves, they really are taking on faith that the person who's selling them this product will treat them well. I think that's the problem that I see picking up - the green movement has brought in some snake oil-type practices and that's very sad."

The situation is similar to that of the late 1970's and early 1980's when the booming solar hot water industry attracted a number of scammers who put up shoddy systems. Many Americans lost confidence in the technology and the solar hot water industry still hasn't fully recovered. This time around, scammers in the solar-photovoltaic industry have gotten more hi-tech. The internet has made it easier for people to set up a professional looking website and lure consumers with flashy promotions and complicated jargon.

The residential wind industry is experiencing a very similar issue, says Wind Energy Expert Mick Sagrillo. He sees the same type of scammers setting up websites promoting new vertical axis turbines and publishing theoretical

performance data that has no relevance to the actual output of a system. Many of these devices are untested and are being promoted by people who know they have a questionable technology, he says. If someone buys a poorly-made turbine and it malfunctions, the consumer's problem turns into a public problem.

"When you put a solar system on your roof and it doesn't work, nobody will be able to tell. When you put a small wind turbine on your roof or in your backyard and it doesn't work, the whole neighborhood knows. That could have a lasting effect on someone's opinion about wind. We have to make sure people are making smart purchases so that we maintain confidence in these technologies," says Sagrillo.

The main reason that sham companies are able to thrive, he says, is that people don't really understand energy. If someone doesn't know what type of performance data to look for, the potential for them to get dazzled by overblown or false claims about a technology increases. As founder of the wind-installation company Lake Michigan Wind and Sun, Sagrillo gets a large number of people looking into wind generators because of the rising cost of gasoline. The fact that people equate electricity generation with gasoline shows how uneducated many Americans are about energy, he says.

"It's great that people are looking for alternatives, but it's amazing how little people know when they seek them out. That leaves people open to purchasing a product that is less-than-reliable. We are a very gullible culture, we're always looking for the magic bullet," says Sagrillo.

That magic bullet thinking is spread by the mainstream media, Sagrillo says. Too many journalists take company claims about cost, performance, and project timelines at face value. He believes that lack of critical analysis is passed on to consumers.

Technology Journalist Peter Fairley agrees. If companies are allowed to make claims they can't deliver on, that may damage public confidence in certain technologies, he says. Too often, companies don't release enough information to properly evaluate claims about the economics or energy output of a product.

"It's critical for us to point out when companies are not answering questions. There's a lot of hype around certain companies that are being very secretive and where there's real potential for not only investors to get hurt, but also for the image of the industry...to be hurt."

One of the more secretive companies in the industry has been Arizona-based Stirling Energy Systems (SES). The company plans to roll out

300 megawatts (MW) of its Dish/Stirling systems in Southern California by 2010 for around US \$1.50 per watt. After that, the company says it will scale up to 900 MW, but it has not issued a timeline for the expansion. There are plans for another project which could eventually bring the total installed capacity of Dish/Stirling systems in California to 1,750 MW.

But Barry Butler, an engineer with 30 years of experience with solar thermal electric technologies, says that SES is not being honest about the realities of its proposal. He's worked with Dish/Stirling devices and believes they have a lot of potential. But "to claim that you could do it for \$1.50 a watt, which is just a little more than a gas turbine, it isn't physically possible. You can't buy the materials and assemble a 16,000 pound dish for that. It defies the laws of physics, materials procurement and materials costs," he says.

In addition, says Butler, rolling out 12,000 Stirling Dishes by 2010 is theoretically possible, but it doesn't take into account any of the reliability issues that the company may face. Right now, there are only six dishes operating today. A more realistic timeline would be to roll out 1 MW (40 dishes) for a year of testing, then move to 10 MW and eventually to 300 MW. Even at such a large scale, SES may be looking at an installed cost of around US \$7.00 per watt, he says.

"They're going to buy 12,000 engines that they've never bought before and put them on dishes and expect to generate power. It's just highly unlikely. They're probably looking at 2020," Butler predicts.

SES declined three interview requests for this story.

There have been a number of stories in the media hailing the SES projects as the next big thing for solar. Butler says that none of them have critically evaluated the issues associated with cost, reliability and timeframe for development.

That type of unchecked enthusiasm is not the way to build a sustainable industry, says Fairley, the journalist. The best way to educate people about the potential of renewable energy is to be realistic about what the technologies can offer.

"One of the failings of technology journalism over the years has often been a tendency to focus on the technical potential of new products to the exclusion of the present technical challenges that need to be overcome. It's important for us to always be flagging those challenges," says Fairley.

Import Capacity of Transmission Lines Serving Southern California

The alternating current transmission import capacity currently serving Southern California, via Path 46 and Path 26, is approximately 14,000 MW. The direct current transmission import capacity currently serving Southern California, via the Pacific Intertie and the Intermountain DC transmission lines, is approximately 5,000 MW. Total import capacity is approximately 19,000 MW.

The three Southern California utilities that utilize this import capacity are Southern California Edison (SCE), San Diego Gas & Electric (SDG&E), and the Los Angeles Department of Water and Power (LADWP). These three utilities have collective average annual electricity retail sales of approximately 14,000 MW, and a collective peak demand of approximately 33,000 MW.¹ The peak demand and annual retail sales for each utility are shown in the table below.

Utility	SCE ²	LADWP ³	SDG&E ⁴	Totals
2007 peak demand, megawatt (MW)	23,000	5,700	4,600	33,000
2006 annual retail electricity sales, gigawatt-hr, (GWh)	79,000	23,000	17,000	119,000

1 GWh = 1,000 MWh

I. Path 46, Southern NV and Western AZ to SoCal, capacity: 10,100 MW

Source: http://www.nationmaster.com/encyclopedia/Path-46#Map_of_all_the_500_kV_wires

The entire Path 46 system has a capacity of transmitting 10,100 MW of electrical power to the population centers of Southern California. The source of the electricity is hydroelectric dams like Hoover Dam on the Colorado River, fossil fuel plants like the clusters of natural gas-fired plants in the Las Vegas area and western Arizona and coal plants in various western states, and nuclear power from the Palo Verde Nuclear Plant in western Arizona.

II. Path 26: Northern CA to Southern CA, capacity: 3,700 MW

Path 26 is a set of three 500 kV transmission lines that is the SCE intertie with Pacific Gas & Electric (PG&E) to the north. The Path is located in the southern Central Valley of California (San Joaquin Valley), the Tehachapi and Transverse Ranges, and the High Desert area. The three Path 26 500 kV lines can transmit 3,700 MW north to south (http://en.wikipedia.org/wiki/Path_26).

III. Pacific DC Intertie: Oregon to LA, capacity: 3,100 MW

The Pacific DC Intertie (also called Path 65) is a transmission line from the Pacific Northwest to the Los Angeles area using high voltage direct current (HVDC). The line capacity is 3,100 MW, which is enough to serve two to three million Los Angeles households.

IV. Intermountain DC Line: Utah to LA, capacity: 1,920 MW

Intermountain is the designation of a HVDC transmission line between the Intermountain Power Plant in Utah and Los Angeles. The Intermountain is an overhead line with a length of 785 km that can transfer up to 1,920 MW at 500kV.

¹ The combined annual average retail sales of the three utilities is calculated by dividing the annual retail sales of 119,000,000 MW-hr by 8,760 hours in a year. $119,000,000 \text{ MWh/yr} \div 8,760 \text{ hr/yr} = 13,600 \text{ MW}$.

² SCE peak demand: Business Wire, *SCE customers use record amount of electricity today*, August 31, 2007. SCE annual retail electricity sales: CEC, *2007 Integrated Energy Policy Report*, January 2008, p. 128.

³ E. Martinez – COO LADWP, *Planning to meet the challenge*, PowerPoint presentation, January 19, 2006. The 2005 peak demand of 5,667 MW identified in this presentation is higher than the 2007 peak demand projection of 5,400 MW.

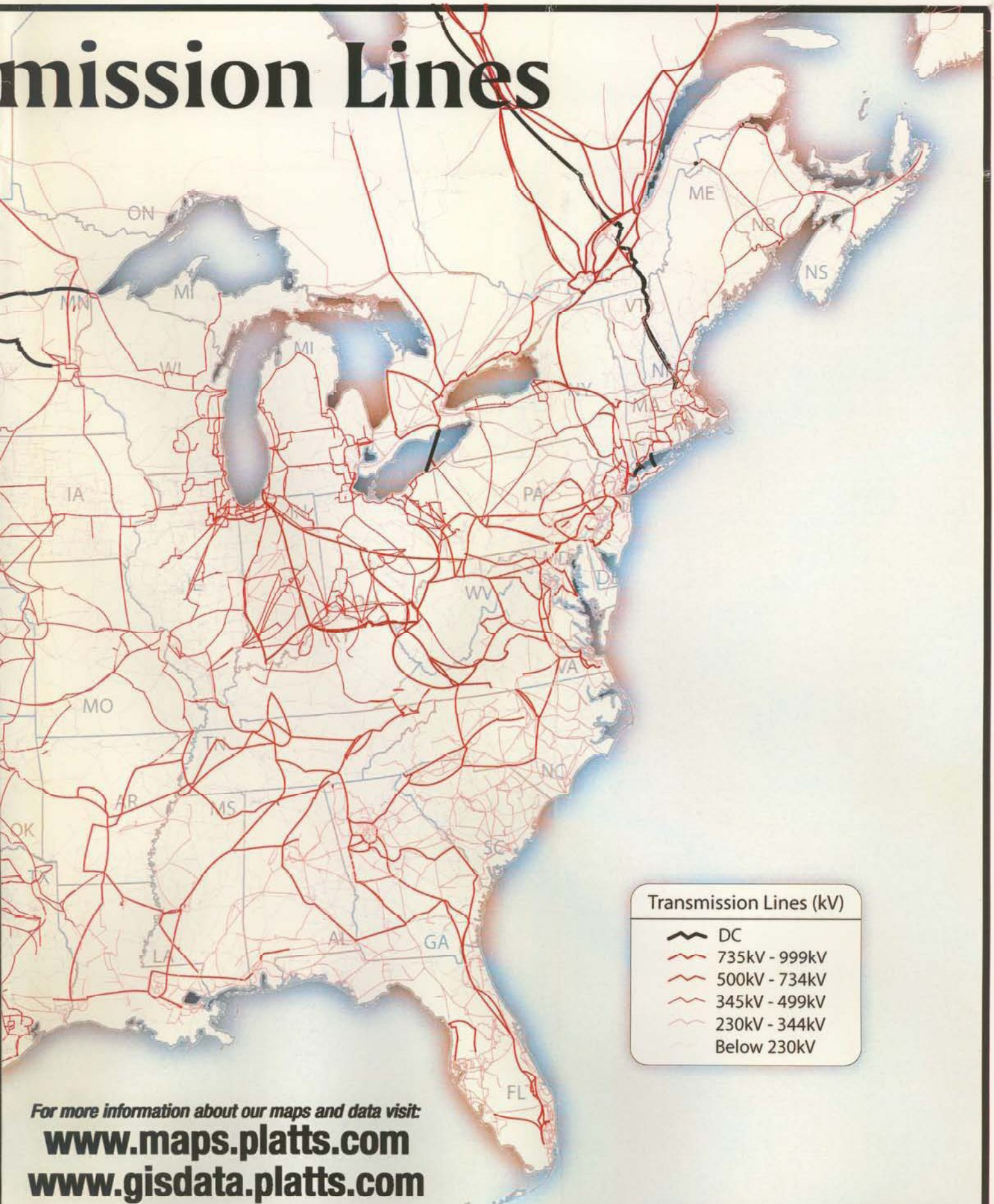
⁴ SDG&E peak demand: US News, *Southern California sets power records*, September 4, 2007. SDG&E annual retail electricity sales: CEC, *2007 Integrated Energy Policy Report*, January 2008, p. 128.

North American Trans



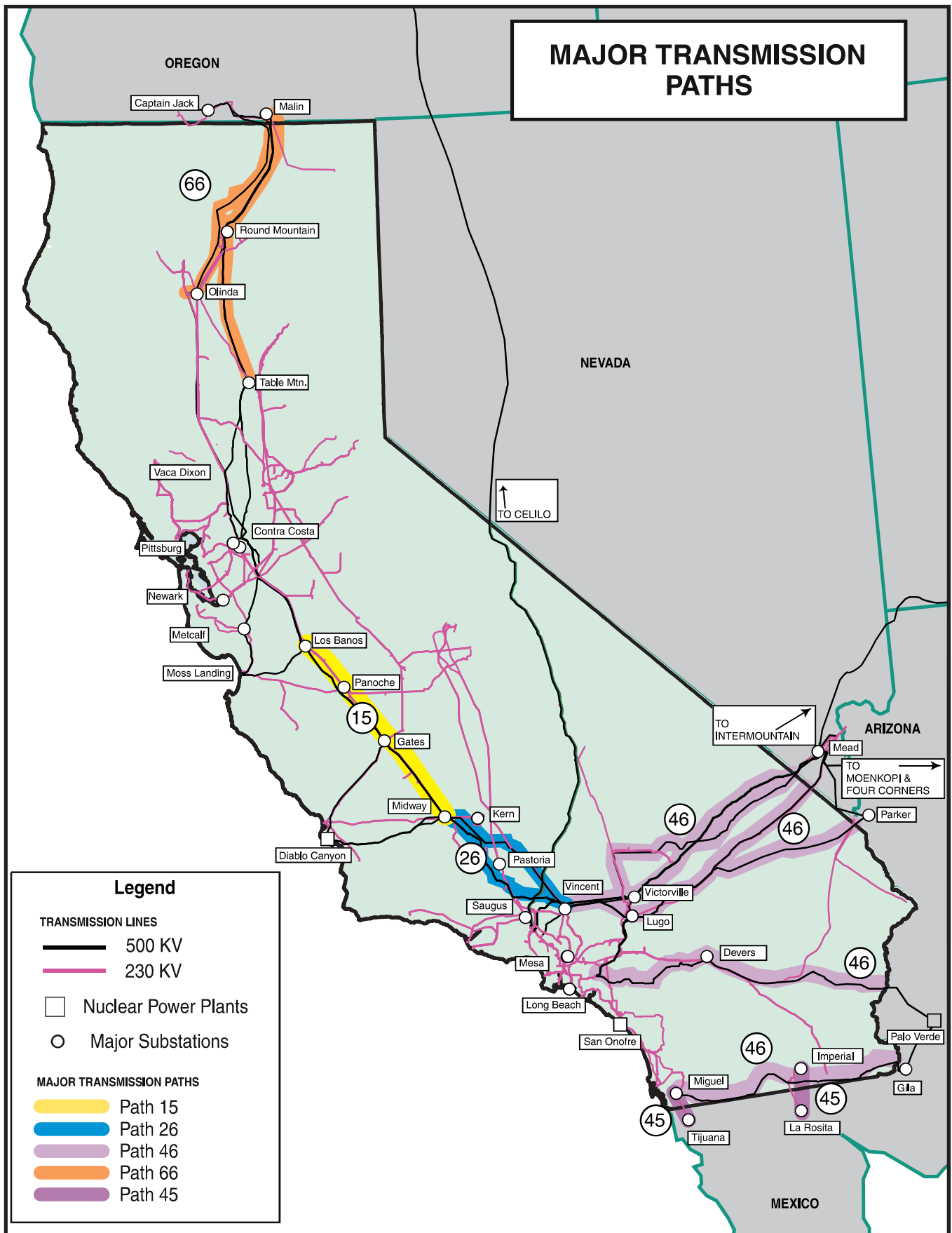
platts
www.maps.platts.com

Transmission Lines



For more information about our maps and data visit:
www.maps.platts.com
www.gisdata.platts.com

FIGURE 1
Major Transmission Paths (230 kV to 500 kV)



CALIFORNIA ENERGY COMMISSION, SYSTEMS ASSESSMENT & FACILITIES SITING DIVISION, AUGUST 2005

SOURCE: CEC Staff

CALIFORNIA
ENERGY
COMMISSION

STRATEGIC TRANSMISSION INVESTMENT PLAN

COMMISSION REPORT

Prepared in Support of the *2005 Integrated Energy
Policy Report* Proceeding (04-IEP-1K)

NOVEMBER 2005
CEC 100-2005-006-CMF



Arnold Schwarzenegger, Governor

Bill Powers

From: Bill Powers [bpowers@powersengineering.com]
Sent: Thursday, September 04, 2008 11:19 AM
To: 'Thomas Del Monte'
Subject: additional information

Thomas,

Polycrystalline silicon PV and thin-film PV cost estimates are included on pdf p. 63 (p. 6-7) of the August 2008 RETI Phase 1B draft report: See:

http://www.energy.ca.gov/reti/documents/2008-08-16_PHASE_1B_DRAFT_RESOURCE_REPORT.PDF

Also, the CEC 2007 IEPR notes (p. 143) the much higher value of on-peak point-of-use PV compared to the market price referent (MPR). The 2007 IEPR notes that SCE pays 3.28 times the MPR for on-peak commercial PV. Slightly higher installed capital costs for thin-film PV systems spread over many commercial buildings and parking lots, compared to putting 500 MW or 1,000 MW on one contiguous utility-scale site in a remote area, would be more than offset by the much higher composite value (of on-peak and off-peak hours) of point-of-use PV within the load center. See: <http://www.energy.ca.gov/2007publications/CEC-100-2007-008/CEC-100-2007-008-CMF.PDF>

I will include this e-mail as an attachment to the ex parte notification I file on today's meeting.

Regards,

Bill Powers
Powers Engineering
619-295-2072

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

In the Matter of the Application of San Diego Gas
& Electric Company (U 902 E) for a Certificate of
Public Convenience and Necessity for the Sunrise
Powerlink Transmission Project.

Application 06-08-010
(Filed August 4, 2006)

**MOTION OF
ZEMER ENERGIA
FOR PARTY STATUS**

December 9, 2008

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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

In the Matter of the Application of San Diego Gas & Electric Company (U 902 E) for a Certificate of Public Convenience and Necessity for the Sunrise Powerlink Transmission Project.

Application 06-08-010
(Filed August 4, 2006)

**MOTION OF THE
ZEMER ENERGIA
FOR PARTY STATUS**

Zemer Energia (ZEMER) respectfully moves for party status in this proceeding, Application (A.) 06-08-010. This Motion is filed pursuant to Rule 1.4 of the Commission's Rules of Practice and Procedure.¹

**I.
DESCRIPTION OF ZEMER ENERGIA**

Zemer Energia (ZEMER) is a subsidiary of Unión Fenosa , a leading international energy company, and the third largest electric utility in Spain. In México, Unión Fenosa currently owns and operates 1,550 MW of natural gas combined cycle generation with another 450 MW combined cycle generation facility currently under construction. ZEMER was established to develop renewable energy generation projects for the Mexican and California electricity markets. Union Fenosa currently has approximately 1,230 MW of wind power under development in México, of which 1,000 MW are located in northern Baja California, in an area adjacent to the border with California known as "La Rumorosa".

The wind projects at La Rumorosa are part of Union Fenosa's €9,000 million Euro global strategic investment plan "BIGGER", of which €1,500 million Euros are specifically earmarked

¹ Rule 1.4 of the Commission's Rules of Practice and Procedure permits a person to become a party to a proceeding by, among other things, filing a motion to become a party. A person filing such a motion must disclose the identity of the persons or entities in whose behalf the motion is made and the interest of such persons or entities in the proceeding. The

for projects in México. Union Fenosa plans to build the projects with its own resources without seeking external sources of financing. The initial 500 MW of La Rumorosa wind electric generation were bid in the 2008 RPS solicitations and are currently in contract negotiations. ZEMER is actively seeking additional off-takers among California utilities for the remaining 500 MW output of its La Rumorosa wind project.

ZEMER has considered various transmission routes for the energy output of its proposed La Rumorosa wind generation facilities. To this end, a Union Fenosa subsidiary submitted two separate interconnection applications to the CAISO with interconnection points at the Miguel and Imperial Valley substations. One of these applications, for interconnection to Imperial Valley Substation (IVSS) is now part of the CAISO transition cluster, having paid all earnest fees due and having demonstrated proof of land control to CAISO's satisfaction.

Pending the outcome of CAISO's transition cluster study, ZEMER will build the necessary transmission infrastructure between its La Rumorosa wind farm and the first interconnection point to the WECC system. The current plan for interconnecting the first 500 MW of the project, calls for the construction of a 230-kV transmission line from its La Rumorosa to a point due south of the Imperial Valley Substation, and for the use of an existing cross-border line to IVSS. The schedule calls for the completion the first 500 MW and associated infrastructure by late-2011, in time for delivery under its RPS. The second 500 MW of wind capacity will require the construction of a new cross-border line to interconnect to IVSS or to a less distant interconnection point to be identified upon completion of the CAISO clustering study.

II.

ZEMER'S INTEREST IN THIS PROCEEDING

On October 31, 2008, the Commission mailed a Proposed Decision and an Alternate Proposed Decision in this proceeding. The Proposed Decision denies San Diego Gas and Electric Company's (SDG&E's) request for a CPCN to build the Sunrise Powerlink Transmission Project (Sunrise). The Alternate Proposed Decision approves the CPCN, but adds conditions to that approval. Specifically, the Alternate Proposed Decision requires SDG&E to file a compliance plan that, among other things, must "specify the renewable generation that will be developed and delivered on Sunrise."² In meeting this condition, SDG&E is required to provide significant detail about these projects, including expected binding commitments, project descriptions, and project construction schedules.³

As ZEMER's wind generation project in La Rumorosa will need sufficient transmission capacity from IVSS, or another point, to reach the California offtakers, ZEMER has a direct interest in these conditions and believes it can provide valuable input through comments and reply comments on the Alternate Proposed Decision and the Proposed Decision and the further rulings and additional Alternate Proposed Decision (President Peevey) that have now been issued in this proceeding. Further, only when this Alternate Proposed Decision was issued and became the subject of an oral argument and an all-party meeting over the last few weeks did ZEMER become fully aware of the impact of conditions that may be imposed by the Commission in authorizing the Sunrise Powerlink transmission line.

ZEMER, therefore, seeks party status to provide these written comments and participate on any further all-party meetings or oral argument on these proposed decisions, as well as any and all other related Commission actions and future phases of this proceeding. Because ZEMER's interest in this proceeding has emerged as a result of the conditions proposed by the

² Alternative Proposed Decision, Ordering Paragraph 2, at p. 284.

Alternate Proposed Decision, ZEMER's motion is timely and its contentions will be reasonably pertinent to the issues already presented in this proceeding. Finally, ZEMER's participation in this proceeding will not prejudice any existing party.

III. CONTACT INFORMATION

On behalf of ZEMER, the following name and information should be included in the "Party" portion of the service list for A.06-08-010:

**Nicolas Puga/Bates White, LLC for
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³ Alternative Proposed Decision, Ordering Paragraph 2, subparts (a) – (c), at pp. 284-285.

**IV.
CONCLUSION**

ZEMER clearly has a pertinent and substantial interest in, and would be affected by, the Proposed Decision and Alternate Proposed Decision mailed in this application on October 31, 2008, and the further Alternate Proposed Decision mailed on November 18, 2008. Until the first Alternate Proposed Decision was issued, ZEMER did not know that conditions would be imposed that would directly affect its interests. ZEMER has, therefore, timely sought to become a party to this application and respectfully moves the Commission to grant ZEMER party status in A.06-08-010 to permit ZEMER to submit written comments on these proposed decisions and the further Alternate Proposed Decision and fully participate in all aspects of this proceeding from this date forward.

Respectfully submitted,

December 9, 2008

/s/ NICOLAS PUGA
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CERTIFICATE OF SERVICE

I, J. Nicolas Puga, am over the age of 18 years and employed in the Washington, in the District of Colombia. My business address is 1300 Eye Street NW, suite 600, Washington, DC 20005.

On December 9, 2008, I served the within document **MOTION OF ZEMER ENERGIA**, in A.06-08-010 (Sunrise Powerlink), with service on the A.06-08-010 service list in the manner prescribed by the Commission's Rules of Practice and Procedure and with additional and separate delivery of paper copies by U.S. Mail to Assigned Commissioner Grueneich and Assigned ALJ Vieth, at Sonoma, California.

Executed on December 9, 2008, at Washington, District of Colombia.

/s/ NICOLAS PUGA
Nicolas Puga

**Electronic and U.S. Mail Service List
A.06-08-010 (Sunrise Powerlink)
December 2, 2008**

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