



DOCKET	
08-AFC-5	
DATE	<u>JUL 27 2010</u>
RECD.	<u>JUL 29 2010</u>

July 27, 2010

Mr. Christopher Meyer
Project Manager
Attn: Docket No. 08-AFC-5
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

Subject: Imperial Valley Solar (formerly Solar Two) (08-AFC-5)
Applicant's Submittal of Imperial County Fire Department Letter

Dear Mr. Meyer:

On behalf of Imperial Valley Solar (formerly Solar Two), LLC, URS Corporation Americas (URS) hereby submits Imperial County Fire Department Letter.

I certify under penalty of perjury that the foregoing is true, correct, and complete to the best of my knowledge. I also certify that I am authorized to submit on behalf of Imperial Valley Solar, LLC.

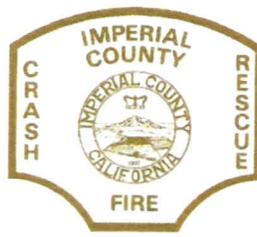
Sincerely,

Angela Leiba
Project Manager

AL: ml

ADMINISTRATION/PREVENTION

1078 Dogwood Road
Heber, CA 92249
Phone: (760) 482-2420
Fax: (760) 482-2427



OPERATIONS/TRAINING

2514 LaBrucherie Road
Imperial, CA 92251
Phone: (760) 355-1191
Fax: (760) 355-1482

July 26th, 2010

California Energy Commission
1516 9th Street
Sacramento, CA 95814

RE: Imperial Valley Solar, Docket No. 08-AFC-5
Attn: Christopher Meyer

Dear Mr. Meyer:

On July 21, 2010, the Imperial County Fire Department (ICFD) submitted a letter (see attached) regarding the above project pertaining to potential costs for mitigation of impacts resulting from the Imperial Valley Solar development. At the time that letter was sent, we had not had the opportunity to fully review the CEC Staff Rebuttal Testimony pertaining to Worker Safety/Fire Protection.

Since then, we have more closely read the staff report and have concluded that it may contain some inaccurate or misleading statements. We apologize for any misunderstandings that may have occurred based on our earlier letter, and we hope to hereby clarify our position.

We agree with that section of the report which states it may be necessary to "...prepare an independent fire needs assessment and a fire risk assessment for the IVS project..." (P. 56). Until such an assessment is completed and fully reviewed by ICFD, it would be difficult for us to accurately determine the proper mitigation measures necessary to address the impacts from this project. Therefore, we are not supportive of the mitigation option identified in the report which quantifies the dollar amounts to be paid by Tessera (P. 59). We hereby request that CEC adopt the alternative found on P. 57 of the report, "...that requires the IVS power plant to...negotiate a mitigation fee agreement with the ICFD..." As further stated in the report said mitigation agreement should cover up-front capital costs, facilities requirements and staffing needs.

We look forward to working with CEC and Tessera to finalize a mitigation agreement at the earliest possible date. We would request that we be provided with specific details and plans for the project, in their final form, as soon as they are available.

Sincerely,

Juan Rodelo, Jr.
Lieutenant, Imperial County Fire Department



**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
IMPERIAL VALLEY SOLAR PROJECT**
(formerly known as SES Solar Two Project)
IMPERIAL VALLEY SOLAR, LLC

**Docket No. 08-AFC-5
PROOF OF SERVICE
(Revised 6/8/10)**

APPLICANT

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Jennifer Jennings
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*indicates change

DECLARATION OF SERVICE

I, Darin Neufeld, declare that on July 27, 2010, I served and filed copies of the attached, Applicant's Submittal of Imperial County Fire Department Letter. The original documents, filed with the Docket Unit, are accompanied by a copy of the most recent Proof of Service list, located on the web page for this project at:
[\[http://www.energy.ca.gov/sitingcases/solartwo/index.html\]](http://www.energy.ca.gov/sitingcases/solartwo/index.html)

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:

- sent electronically to all email addresses on the Proof of Service list;
 by personal delivery;
 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:

- 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-5
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
Darin Neufeld