

DOCKET

08-AFC-5

DATE MAR 31 2010

RECD. APR 05 2010

STATE OF CALIFORNIA
California Energy Commission

In the Matter of:

The Application for Certification for the
Imperial Valley Solar Project
(Formerly SES Solar Two)

Docket No. 08-AFC-5

Tom Budlong, Intervenor
Data Request Set One, Data Requests 1-3

March 31, 2010

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Background

The requested information is necessary to more fully understand the performance of SunCatchers. In the DEIS, staff and references identify that reliability is a potential issue. The DEIS does not contain information to determine cost competitiveness of energy that will be generated. No information has been provided to verify the 25MW per SunCatcher generating capability.

Search of Previous Data Requests

I did not find answers to these data requests in the project's previous data requests. I downloaded all data requests and responses to data requests, (some 125 MB and 15 documents) listed on the Documents and Reports page for the Imperial project, then used Windows 7's folder search feature. I searched for several terms: '25 KW', '25KW', 'MTBF', 'reliability', 'mean time' and 'failure'. To verify the search was working I searched for '25', and got lots of hits (none related to SunCatcher output). That I failed to find is not proof that answers are not there. Please respond with reference to the appropriate documents if indeed these questions have been answered in previous data requests, or in other documents related to the project.

Data Request 1) SunCatcher Electrical Output

Background:

SunCatcher output is claimed to be 25 MW (capacity) wherever mentioned, either with respect to this project or outside this project, without qualifications. The project is based on this number, and the corresponding energy output of 1,600,000 MW-hours per year for the 30,000 SunCatchers planned for the project. I could not find verification, either from independent testing or applicant test data, to verify these numbers. It is imperative that the output be verified, to gain confidence that the project will perform as expected.

Request:

Please provide information to verify the 25KW SunCatcher capacity, and annual energy output. Note that the project is stated to have 30,000 SunCatchers, with an annual output of 1,620,000 MW-hours, indicating a capacity factor of a little less than 25%, to wit:

- Annual output of 1,620,000 MW-hours for 30,000 SunCatchers is 54 MW-hours for each SunCatcher.
- 54 MW-hours per year, divided by (24x365 = 8760) hours per year is 6.16 KW.
- 6.16 KW / 25KW is 24.7% capacity factor.

The information should include test data from production or advanced prototype SunCatchers, and insolation data at the Plaster City site.

Data Request 2) SunCatcher Reliability

Background:

There is a serious question of SunCatcher reliability. Dr. Butler's 2007 testimony before the PUC¹ questions that SunCatchers are reliable enough at this stage in their development for a full-size industrial implementation. Staff, in the DEIS, raises this question, and the claimed 98% availability. Prudent field testing data should give indications to answer these concerns.

Request:

Please provide SunCatcher MTBF and availability data, with field experience from prototype and production SunCatchers to support these data. Since a high availability can be attained with low MTBF through intensive maintenance, provide the level of maintenance data. Provide expected maintenance and replacement costs for SunCatchers for the life of the project, projected to be 40 years.

Data Request 3) Cost of Production, Cost of Renewable Energy, Pricing

Background:

I have not found data in the SA/DEIS or other documents associated with the project describing the expected cost of generated electricity, to indicate it can be competitively priced.

Request:

Please provide estimated cost of electricity production. Include production on-going costs, asset amortization, expected maintenance costs, interest costs, and all other costs normally considered when examining economic performance.

Please provide cost of competing renewable energy projects.

Please provide information relating to pricing obligations with SDG&E, the applicant's customer, sufficient to determine economically viability of the project.

March 31, 2010

Date

/s/ Tom Budlong

Signature



¹ Dr. Butler's testimony: First reference on page D.4-10 (1416) of the SA/DEIS.

STATE OF CALIFORNIA
State Energy Resources
Conservation and Development Commission

In the Matter of:)
)
Imperial Valley Solar, LLC) **DECLARATION OF SERVICE**
)
_____)

I, Tom Budlong, declare that on March 31, 2010 I served and filed copies of the attached **Data Set Request Set One, Data Requests 1-3**, accompanied by a copy of the most recent *Proof of Service* list (most recent version is located on the proceeding's web page) with the Docket Unit OR with the presiding committee member of the proceeding. The document has been sent to the Commission AND the applicant, as well as the other parties in this proceeding (as shown on the *Proof of Service* list), in the following manner:

(Check all that Apply)

FOR SERVICE TO THE APPLICANT AND ALL OTHER PARTIES:

sent electronically to all email addresses on the Proof of Service list;

_____ by personal delivery or by depositing in the United States mail at [location: city and state] _____ with first-class postage thereon fully prepaid and addressed as provided on the *Proof of Service* list above 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

-or-

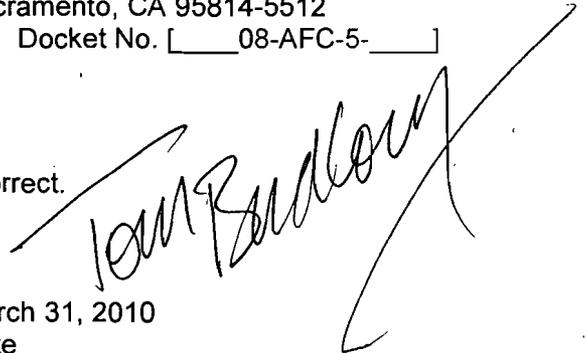
CALIFORNIA ENERGY COMMISSION
Presiding Member _____
1516 Ninth Street
Sacramento, CA 95814-5512
Re: Docket No. [____ 08-AFC-5-____]

docket@energy.state.ca.us

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

/s/ Tom Budlong. Mailed copy has original signature.
Name

March 31, 2010
Date





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 3/9/10)

FROM WEB SITE
MAR 31, 2010

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