



455 Capitol Mall Suite 350  
Sacramento CA 95814  
Tel· 916.441.6575  
Fax· 916.441.6553

**DOCKET**

**02-AFC-1C**

DATE NOV 08 2011

RECD. NOV 08 2011

November 8, 2011

California Energy Commission  
Dockets Unit  
1516 Ninth Street  
Sacramento, CA 95814-5512

Subject: **DECLARATION OF ROBOT LOOPER  
BLYTHE ENERGY PROJECT PHASE II AMENDMENT  
DOCKET NO. (02-AFC-1C)**

Enclosed for filing with the California Energy Commission are 1 (one) original and 1 (one) copy of the **DECLARATION OF ROBOT LOOPER**, for the Blythe Energy Project Phase II Amendment (02-AFC-1C).

Sincerely,

A handwritten signature in blue ink that reads "Marie Mills". The signature is written in a cursive, flowing style.

Marie Mills

STATE OF CALIFORNIA

Energy Resources  
Conservation and Development Commission

In the Matter of:

Application For Certification for the  
BLYTHE ENERGY PROJECT PHASE II  
AMENDMENT

**DOCKET NO. 02-AFC-1C**

**DECLARATION OF**  
Robert Looper

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I, Robert Looper, declare as follows:

1. *I am presently employed by Caithness Blythe II, LLC, as a Senior Vice President.*
2. *It is my professional opinion that the attached prepared testimony is valid and accurate with respect to the issues that it addresses.*
3. *I am personally familiar with the facts and conclusions related in the attached prepared testimony and if called as a witness could testify competently thereto.*
4. Caithness Blythe II, LLC, is the owner of the Blythe Energy Project Phase II (02-AFC-1C) (BEP II). In February of 2002, Caithness Blythe II, LLC, filed an Application for Certification (AFC) with the California Energy Commission (CEC) for a nominal 520 Megawatt (MW) combined cycle project. The CEC granted the BEP II a license to construct and operate the BEP II on December 14, 2005.
5. On March 13, 2003 Desert Southwest Power (DSWP) filed requests with Southern California Edison and the California Independent System Operator (CAISO) to interconnect the Desert Southwest Transmission Project (DSWTP) from the Keim Substation to Devers Substation at 500 kV.
6. On March 17, Caithness Blythe II, LLC, filed an interconnection request with the CAISO to interconnect and deliver 520 MW from the BEP II project.
7. On April 1, 2003, the BEP II interconnection request into the CAISO grid was deemed complete with a queue date of March 18, 2003.

8. On March 15, 2006, Southern California Edison (SCE) completed and issued the BEP II System Impact Study.
9. On September 29, 2006, SCE tendered to BEP II the Draft Facilities Study Agreement, and on October 11, 2006 the Final Facilities Study which was eventually issued and completed on February 2, 2007. The Facilities Study identified a potential maximum exposure or interconnection cost a \$306,628,000.
10. The DSWTP has undergone complete environmental analysis and received its Record of Decision (ROD) from the Department of the Interior on September 18, 2007. The Imperial Irrigation District (IID) was the lead CEQA agency completing the Environmental Impact Report (EIR). The DSWTP consists mainly of a double circuit 500 kV transmission line which extends from the Keim Substation to Devers Substation. One (1) of the 500 kV transmission line circuits will interconnect with the Colorado River Substation (CRS) approximately 8 miles from the Keim Substation.
11. The Keim Substation is not part of the CAISO network, and was speculative at the time of the BEP II CEC licensing effort because the Keim Substation was still undergoing permitting as part of the DSWTP.
12. Desert Southwest Power (DSWP) in conjunction with IID will construct, own, and operate the DSWTP. IID is the holder of the Bureau of Land Management (BLM) Right-of-Way (ROW) grants for the DSWTP.
13. Caithness Blythe II, LLC, has an agreement with DSWP to connect BEP II to the Keim Substation.
14. DSWP will deliver the electricity generated from BEP II, through DSWTP facilities to SCE's CRS.
15. On February 5, 2008, an updated interconnection costs assessment found the BEP II interconnection costs were at or around \$74,669,000 with a potential additional \$3,864,000.
16. On May 7, 2007, Caithness Blythe II, LLC, filed an expansion request for the BEP II with SCE and the CAISO for the additional capacity contemplated due to the modified turbine technology. The CAISO and SCE performed a Feasibility Study, issued on February 27, 2008, regarding the Expansion Request and subsequently waived the System Impact Study and Facilities Study in granting the request.
17. The BEP II was originally permitted with the project utilizing two Siemens Westinghouse V84.3a 170 MW turbines which are no longer commercially available. The current BEP II Amendment modifies the turbine technology to SGT6-5000F turbines which are more efficient, and incorporate fast-start capability.

18. On January 10, 2010, Caithness Blythe II, LLC, received a signed Large Generator Interconnection Agreement (LGIA) executed by CAISO, which identified the potential interconnection cost as \$22,466,500.
19. Caithness Blythe II, LLC, bid the BEP II into SCE's Request for Proposals (RFP) for New Generation Resources in May of 2005, the Arizona Public Service Company's (APS) RFP for Long Term Capacity Supply in July of 2005, IID's RFP for Gas Fired Capacity in December of 2005, SCE's Request for Offers (RFO) for New Generation in August of 2006, SCE's Revised New Generation RFO in December of 2006, as well as SCE's RFP solicitation in 2008. Since the 2008 solicitation, SCE nor any of the neighboring utilities, have issued a long term, (ten or more years) All-Source RFP.
20. Caithness Blythe II, LLC, now has a revised draft LGIA which will allow the delivery of its electricity to a breaker position at SCE's CRS.
21. As of 2011, the BEP II has a senior queue position and an updated Draft LGIA with the CAISO for delivery of electricity at the CRS.
22. Caithness Blythe II, LLC, has agreed with the CAISO to push back the earliest Commercial Online Date (COD) to 24 months after the start of construction of the CRS, in order to assist near term renewable developers.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct to the best of my knowledge and that this declaration was executed on November 8, 2011.



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Robert Looper  
Senior Vice President  
Caithness Blythe II, LLC