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August 8, 2012

VIA FACSIMILE TO (916)654-3882 AND EMAIL TO ERIC.VEERKAMP@ENERGY.CA.GOV

California Energy Commission
Energy Facilities Siting Office
ATTN: Eric Veerkamp, Compliance Project Manager
1516 Ninth Street
Sacramento CA 95814-5112

RE: GENESIS SOLAR ENERGY PROJECT (09-AFC-8C). POSSIBLE APPROVAL OF THE PETITION TO AMEND THE ENERGY COMMISSION DECISION TO RELOCATE THE GEN-TIE LINE, THE NATURAL GAS LINE, AND TO REVISE AIR QUALITY CONDITIONS OF CERTIFICATION.

Dear Honorable Members of the Commission and Mr. Veerkamp:

On April 7, 2012, Genesis Solar, LLC, filed a petition with the California Energy Commission (Energy Commission) to amend the Genesis Solar Energy Project (GSEP). The 250-megawatt solar thermal power generating station, certified by the Energy Commission on September 29, 2010, received a Final Notice to Proceed on August 23, 2011, and the project is currently under construction. The facility is located on approximately 1,800 acres in an unincorporated area of eastern Riverside County, approximately 22 miles west of the City of Blythe, California. The County of Riverside (County) recently received the Energy Commission's Notice of Receipt of the Petition to Amend and is aware that the Energy Commission will consider possible approval of the Petition to Amend at its August 9, 2012 Business Meeting (Agenda Item 5). The County respectfully provides the following comments on this issue.

Specifically, Genesis Solar, LLC has petitioned the Energy Commission to amend the final decision for a relocated electric gen-tie line route, relocated natural gas line routes, the addition of an electric ring bus near the Colorado River Substation, and modifications to the air quality permits issued by the Mojave Desert Air Quality Management District (MDAQMD).

Based upon the petition materials provided, it is unclear to the County whether or not the proposed relocation of the electric gen-tie line route or the natural gas line routes will be located on or involve the use of County-owned real property, County easements, County roads or other County rights of way. The County recognizes the Energy Commission's exclusive jurisdiction over (a) electric transmission lines, as defined in Public Resources Code section 25107, from the thermal power plant site to the first point of interconnection with the transmission system and (b) thermal power plants with a generating capacity of 50 or more megawatts as defined in Public Resources Code section 25120. However, to the extent that the proposed relocated electric

transmission line or natural gas lines will be located on or involve the use of County-owned real property, County easements, County roads or other County rights of way, County approval and compliance with the County's comprehensive, integrated legislative solar power plant program is required.

Thank you for the opportunity to provide these comments on this issue of importance to the County. Should you have any questions concerning this response, please do not hesitate to contact me at (951) 955-6300.

Sincerely,

PAMELA J. WALLS
County Counsel

A handwritten signature in black ink, appearing to read 'P. Walls', followed by a large, stylized circular flourish.

Tiffany N. North
Deputy County Counsel

Cc:
Jennifer Jennings, Public Adviser – California Energy Commission
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