

July 8, 2010

Mr. Alan Solomon
Project Manager
Siting, Transmission and Environmental Protection Division
California Energy Commission
1516 Ninth Street, MS-15
Sacramento, CA 95814

DOCKET

09-AFC-6

DATE JUL 08 2010

RECD JUL 13 2010

Re: Revised Staff Assessment of the Blythe Solar Power Project (CEC-700-2010-004-REV1)

Dear Mr. Solomon:

EnXco is a global energy developer of wind and solar resources with a Plan of Development (POD) for a solar project located north of the Blythe Solar Power Project (BSPP). We have two concerns about the Revised Staff Assessment (RSA) of the Blythe Solar Power Project: first, we would like to provide an update for the cumulative impacts section of the staff assessment, and second, we are requesting further information on the proposed generation-tie transmission corridor that passes through the middle of the Blythe Solar Power Project.

In the Cumulative Impacts section of the RSA, Table 3 on page B.3-11 refers to ID# M as the NextEra (FPL) McCoy project area, totaling 20,608 acres. In late 2008, however, enXco filed serial application CACA 049490, for over 13,000 acres of the highlighted area with ID# M and, in addition, enXco filed a POD for the enXco McCoy Soleil Project with the Palm Springs BLM office in February, 2009. (shown now in Table 3 as ID# N, but incorrectly mapped on Cumulative Impacts Figure 2). We believe page B.3-11 and Cumulative Impacts Figure 2 should be modified to reflect this change, which takes into greater account progress made by enXco and NextEra in the McCoy area, due to their proximity to the BSPP and implications for transmission interconnection in the I-10 corridor.

Given the location of the enXco and NextEra PODs, due north of the BSPP, it is critically important that the BSPP provide a corridor through the project area for future transmission lines that would serve solar projects developed to the north. Project Description Figure 1 shows the project layout for BSPP, including depiction of a "transmission line corridor" that terminates at the north boundary of the BSPP. The transmission corridor is also illustrated on Traffic and Transportation Figure 1 of the Revised Staff Assessment. Unfortunately, enXco is unable to find any further detail in the RSA, or other public documents from Solar Millennium on the width of the transmission corridor, or its path to the north, where both NextEra and enXco have projects in development. Given the size and number of projects north of the BSPP, a reasonable expectation is that each of three projects could require a double-circuit 230 kV transmission line, so the corridor through the BSPP should be at least 1,000 feet wide.

With the encouragement of the BLM Palm Springs/South Coast Field Office, enXco corresponded with Rachel McMahon, Alice Harron, Michael Cressner, and Elizabeth Ingram of Solar Millennium, in April, 2010 (attachment). In this letter, we requested further information and that we be allowed to coordinate efforts to make sure that project sites to the north of Blythe were not stranded, or forced to pursue transmission line route alternatives in more environmentally or culturally sensitive areas to the east. Unfortunately, we have heard nothing from Solar Millennium and consequently, are writing the CEC to request clarity on the issue.

PROOF OF SERVICE (REVISED 5/3/10) FILED WITH
ORIGINAL MAILED FROM SACRAMENTO ON 7/13/10
HA

Please feel free to write, or call me and the SW Solar Team at enXco, at your convenience. If requested, enXco can provide further details on its own project site and development plans and timeline.

Regards,

Ian Black

Solar Development

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From: "Ian Black" <Ian.Black@enxco.com>
To: <harron@solarmillennium.com>, <cressner@solarmillennium.com>, <ingram@so...>
Date: 4/21/2010 10:01 PM
Subject: FW: enXco Solar, regarding I-10 BLM transmission

Alice, Elizabeth and Michael,

My name is Ian Black and I am following up on an email exchange with Rachel McMahon, regarding Solar Millennium's Blythe project in the I-10 corridor, on what I believe is BLM land. As it turns out, we have neighboring projects and the Palm Springs BLM office is encouraging us to meet and discuss any potential transmission ROW issues, with a goal to mitigate environmental impacts that may arise as projects develop.

As enXco advances in its project development plans, we want to engage early and often with your Blythe team (congratulations on your draft EIS, by the way) and discuss ways to best mitigate potential issues and work within the guidance BLM has given us. I'm reaching out now to see if we can set up some time to talk.

I am in Palm Springs every few weeks and am otherwise located in San Ramon. I am happy to connect and meet up for coffee, lunch, or over the phone, at your convenience. I look forward to speaking soon. Take care.

Kind Regards,

Ian Black

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From: Rachel McMahon [mailto:mcmahon@solarmillennium.com]
Sent: Friday, April 02, 2010 9:57 AM
To: Ian Black
Subject: Re: enXco Solar, regarding I-10 BLM transmission

Ian - Thank you for following up. I have forwarded your e-mail to our permitting team and hope you are able to connect with them. Their addresses are as follows: Alice Harron - harron@solarmillennium.com, Michael Cressner - cressner@solarmillennium.com, and Elizabeth Ingram - ingram@solarmillennium.com.

Regards,
Rachel

From: Ian Black <Ian.Black@enxco.com>
To: Rachel McMahon
Sent: Thu Apr 01 13:08:02 2010
Subject: enXco Solar, regarding I-10 BLM transmission

Rachel,

My name is Ian Black and I am leading enXco's BLM solar project development. I left a vm this afternoon on your cell and office phone and wanted to introduce myself by email, as well. My colleague Rick Miller met you in Riverside last week and he mentioned the issue of transmission along the I-10 corridor came up.

We have a project being developed just north of Solar Millennium's Blythe project and we are looking forward to reviewing the draft EIS for your project when it becomes public, later this month. As we ramp up our development efforts to the North of your Blythe project, we are responding to BLM's encouragement to reduce environmental impacts and pursue joint-solutions with our development peers. Rick passed along your contact information and I am writing to reach out and discuss the transmission ROW and gen-tie options with your Blythe project.

When you have an opportunity, please drop me an email and/or a phone call, to discuss. I look forward to hearing from you; have a great day.

Kind Regards,

Ian Black

Associate Developer - Solar

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BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT
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**APPLICATION FOR CERTIFICATION
FOR THE *BLYTHE SOLAR
POWER PLANT PROJECT***

Docket No. 09-AFC-6

PROOF OF SERVICE
(Revised 5/3/10)

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DECLARATION OF SERVICE

I, Hilarie Anderson, declare that on July 13, 2010, I served and filed a copy of the attached Comment Letter from Ian Black of EnXco. The original document, filed with the Docket Unit, is 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/solar_millennium_blythe

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. 09-AFC-6
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.

Original Signature in Dockets
Hilarie Anderson