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DOCKET

09-AFC-6

DATE JUN 16 2010

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June 16, 2010

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

Subject: **PALO VERDE SOLAR I, LLC's PREHEARING CONFERENCE STATEMENT
BLYTHE SOLAR POWER PROJECT
DOCKET NO. (09-AFC-6)**

Enclosed for filing with the California Energy Commission is the original of **PALO VERDE SOLAR I, LLC's PREHEARING CONFERENCE STATEMENT**, for the Blythe Solar Power Project (09-AFC-6).

Sincerely,

Marie Mills

Scott A. Galati
Robert A Gladden
GALATIBLEK LLP
455 Capitol Mall
Suite 350
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(916) 441-6575

STATE OF CALIFORNIA

Energy Resources
Conservation and Development Commission

In the Matter of:

Application for Certification for the
BLYTHE SOLAR POWER PROJECT

DOCKET NO: 09-AFC-6

**PALO VERDE SOLAR I, LLC'S
PREHEARING CONFERENCE
STATEMENT**

INTRODUCTION

Palo Verde Solar I, LLC (PVSI), a wholly owned subsidiary of Solar Millennium LLC, in accordance with 20 CCR § 1718.5 and the Committee Order dated April 30, 2010, hereby files its Prehearing Conference Statement for the Blythe Solar Power Project (BSPP). PVSI is prepared to proceed to evidentiary hearing on all topic areas contained in the Revised Staff Assessment (RSA).

In accordance with the above referenced order, PVSI presents its Prehearing Conference Statement, as follows:

A. Topic Areas Complete and Ready to Proceed To Evidentiary Hearing

PVSI believes that all topic areas (and or disciplines) are complete and ready for adjudication at the Evidentiary Hearings. Staff has elected to refrain from publishing sections on Socioeconomics and Cultural Resources, and has opined that it cannot make conclusions regarding Transmission System Engineering, Land Use and Traffic and Transportation. For the reasons discussed below, we believe the Committee has ample evidence without Staff's additional testimony to conclude that the BSPP will not result in significant environmental impacts and will comply with all applicable laws, ordinances, regulations and standards (LORS).

B. Incomplete Topic Areas

The RSA does not include Staff analysis relating to Cultural Resources and states that this section of the RSA will be included in a Supplemental Staff Assessment on June 30, 2010. PVSI believes that the Committee can proceed to evidentiary hearing with or without the Supplemental Staff Assessment and therefore has proposed its own Conditions of Certification in the Opening Testimony for Commission consideration. Staff's failure to publish the Cultural Resources section with the RSA on June 4, 2010 has jeopardized the schedule. PVSI request the ability to augment its Cultural Resources testimony on July 7, 2010 in order to respond to the Supplemental Staff Assessment. If Staff fails to publish this section by June 30, 2010, PVSI requests the Committee proceed to evidentiary hearing anyway and rely on the wealth of information provided by PVSI.

The RSA also did not include Socioeconomic Resources even though that section was complete in the SA/DEIS. PVSI again requests the Committee to not allow Staff's failure to publish this section to delay the schedule and if Staff publishes a Supplemental Staff Assessment on June 30, 2010 that PVSI be granted the ability to file testimony on July 7, 2010 in response. If Staff fails to publish this section by June 30, 2010, PVSI requests the Committee proceed to evidentiary hearing anyway and rely on the wealth of information provided by PVSI and by Staff in the SA/DEIS.

Staff has also stated that it could not conclude that the BSPP would comply with LORS and could not conclude whether the impacts were mitigated for the areas of Traffic and Transportation and Land Use. PVSI disagrees with Staff that the Committee will need any additional information to make a decision regarding these topic areas. There is no reason for Staff to have not completed its analysis in these topic areas and PVSI is ready to proceed to evidentiary hearing. In essence, Staff's unilateral determination to prepare additional testimony on these subject areas in a Supplemental Staff Assessment is unwarranted. If however, the Committee allows Staff to file additional testimony for these subject areas, PVSI requests that it be granted the ability to file testimony on July 7, 2010 in response.

Staff has also stated that it cannot complete its LORS review of the BSPP without the Phase II transmission study. PVSI disagrees. Staff has included a requirement in Condition of Certification TSE-1 that requires a demonstration of compliance with the study by execution of the Large Generator Interconnection Agreement (LGIA). This will be evidence that the BSPP has complied with all applicable Transmission System Engineering-related LORS and the Committee can rely on this condition to support a finding that the project **will comply** with

such LORS. Therefore, PVSI requests that the Committee proceed to evidentiary hearing and Decision independent of the Cal-ISO studies.

C. Disputed Topic Areas

PVSI characterizes the disputed topic areas into the following three categories.

- Category 1. Topic areas where PVSI agrees with Staff's analysis and ultimate conclusions but offers modifications to analysis or Conditions of Certification for Committee consideration and where live testimony is not warranted
- Category 2. Topic areas where PVSI disagrees with Staff analysis and ultimate conclusions and/or Conditions of Certification where live direct testimony and cross-examination are warranted
- Category 3. Topic areas where PVSI disagrees with CURE where live direct testimony and cross-examination are warranted

Category 1 topics include Alternatives, Air Quality, Hazardous Materials, Public Health, Project Description, Transmission Line Safety and Nuisance, and Transmission System Engineering.

Category 2 topics include Biological Resources, Land Use, Soil & Water, Traffic and Transportation, Visual Resources, and Worker Safety.

Category 3 topics include Biological Resources and Waste Management.

A brief description of the disputes are included in Table 1.

D. Proposed Witnesses and Testimony

Table 1 identifies the witnesses that PVSI intends to call and offer direct testimony including a brief summary of the subject areas of the testimony and an estimate of the amount of time necessary for direct live testimony. The table also identifies those areas where PVSI believes live testimony is not warranted and therefore offers to submit the testimony upon sworn declaration.

E. Cross-Examination

Table 1 identifies those witnesses that PVSI will cross-examine with an estimate of the amount of time necessary. PVSI does not challenge the qualifications of any witness to provide expert testimony in accordance with the testimony received to date. A brief description of the subject areas in dispute that will encompass the scope of cross-examination is included in Table 1.

F. Exhibit List

Table 2 is PVSI's Proposed Exhibit List.

G. Finding of Override

The RSA identified potential unmitigatable impacts in Visual Resources and Land Use. The RSA also did not conclude whether it believes the BSPP will comply with Traffic and Transportation LORS or will result in significant unmitigatable impacts to the Blythe Airport. PVSI disagrees with Staff and believes that the BSPP will not result in unmitigatable significant impacts and will comply with all applicable laws, ordinances, regulations and standards (LORS). The only way that PVSI would request a Finding of Override would be if the Committee did not agree.

H. Scheduling

In order to facilitate the schedule, PVSI request the Committee allow the parties to make a brief closing argument at the end of testimony for each section so that the Committee can decide whether or not briefs are necessary. At this time PVSI would not recommend briefing and if the Committee did require briefing that such briefing would not include closing argument regarding the facts and ultimate conclusions but be limited to well defined legal questions only.

PVSI understands that Staff is preparing a Supplement to the RSA and that such Supplement will be published by June 30, 2010. To allow the parties to proceed to evidentiary hearing and conclude the presentation of evidence for all topic areas, PVSI proposes that all parties file testimony limited to the matters covered in the Supplement on July 7, 2010. Parties could present rebuttal testimony at the evidentiary hearings but would be required to exchange any rebuttal exhibits by July 9, 2010.

I. Proposed Modifications to Conditions of Certification

PVSI has carefully reviewed the RSA and is in general agreement with the substantial majority of its Conditions of Certification. Conditions of Certification where PVSI respectfully requests modifications are presented in our Opening Testimony.

CONCLUSION

PVSI looks forward to a productive and efficient PreHearing Conference and Evidentiary Hearing.

Dated: June 16, 2010

Respectfully Submitted,

// original signed //

Scott A. Galati
Counsel to Palo Verde Solar I, LLC

TABLE 1

**Blythe Solar Power Plant
Proposed Witness List**

TOPIC AREA	DISPUTES BETWEEN PARTIES	WITNESS	TESTIMONY SUMMARY	DIRECT TESTIMONY ESTIMATE	CROSS-EXAM ESTIMATE
ALTERNATIVES	Minor Category 1	DRAKER, Ray PVSI, LLC LUTTRELL, Mark AECOM	PVSI wishes for the Committee to include additional Project Objectives rejected by Staff	Declaration	None
AIR QUALITY	Minor Category 1	HAMEL, Richard HEAD, Sarah AECOM KINGSLEY, Russ AECOM	PVIS disagrees with Staff use of the federal PSD thresholds as CEQA significance thresholds and proposed minor changes to Conditions of Certification	Declaration	None
BIOLOGICAL RESOURCES	Major Dispute, Category II and Category III	KARL, Alice Alice Karl & Associates GRAHAM, Bill AECOM GUIGLIANO, Jennifer AECOM MCMILLAN, Scott AECOM ANGUIANO, Michael AECOM HARBIN-IRELAND, Angie AECOM	Disagreement with Staff on impacts and Conditions of Certification relating to ephemeral washes; characterization of desert tortoise habitat; Couch's Spadefoot Toad; cumulative impacts; decommissioning; effect of steam blows; Bighorn Sheep; plant mitigation; timing of mitigation and preconstruction surveys; Raven Management Plan fees; Burrowing Owl mitigation; plant mitigation; Mojave Fringe Toad Lizard mitigation; and Golden Eagle impacts PVSI also disputes the following areas with CURE	1	Staff – 1 hour Cashen – 0.5 hours Toure – 0.5 hours Bleich – 0.5 hours

TOPIC AREA	DISPUTES BETWEEN PARTIES	WITNESS	TESTIMONY SUMMARY	DIRECT TESTIMONY ESTIMATE	CROSS-EXAM ESTIMATE
			Couch's Spadefoot Toad; ephemeral washes; Gila Woodpecker; Bighorn Sheep; Coachella Valley Milkvetch; drainage design; and mitigation lands		
CULTURAL RESOURCES	None	JORDAN, Stacey AECOM VARGAS, Benjamin AECOM	Proposed Condition of Certification	0.5 hours	None
FACILITY DESIGN	None	DRACKER, Ray PVSI, LLC PETTO, Steve AECOM	Submitted on Declaration	None	None
GEOLOGY AND PALEONTOLOGY	None	FLACK, Mike AECOM CORSETTI, Cara SWCA	Submitted on Declaration	None	None
HAZARDOUS MATERIALS	Minor Category I	DUDASKO, Mike AECOM LUTTRELL, Mark AECOM	Modified Hazardous Materials List, Submitted on Declaration	None	None
LAND USE	Major Category II	INGRAM, Elizabeth SM GRAHAM, Bill AECOM	Disagrees with Staff on ultimate conclusion that the Project results in significant cumulative impacts to loss of open space; Airport Land Use Plan Consistency	0.5 hours	Staff – 0.5 hours

TOPIC AREA	DISPUTES BETWEEN PARTIES	WITNESS	TESTIMONY SUMMARY	DIRECT TESTIMONY ESTIMATE	CROSS-EXAM ESTIMATE
NOISE AND VIBRATION	None	GOODSON, Jeff AECOM PETTO, Steve AECOM LUTTRELL, Mark AECOM	Submitted on Declaration	None	None
POWER PLANT EFFICIENCY	None	DRAKER, Ray PVSI, LLC	Submitted on Declaration	None	None
POWER PLANT RELIABILITY	None	DRACKER, Ray PVSI, LLC	Submitted on Declaration	None	None
PROJECT DESCRIPTION	Minor, Category I	HARRON, Alice SM INGRAM, Elizabeth SM HOLLENBACHER, Ralph SM THOR, Trevor PVSI, LLC KELLY, Shawn AECOM	Minor revisions to reflect the current project description, Submitted on Declaration	None	None
PUBLIC HEALTH	Minor, Category I	HEAD, Sarah AECOM KINGSLEY, Russ AECOM	Minor corrections, Submitted on Declaration	None	None
SOCIOECONOMICS	None	HARRON, Alice SM INGRAM, Elizabeth SM LARSON, Dennis AECOM	Can rely on analysis performed in AFC	None	None

TOPIC AREA	DISPUTES BETWEEN PARTIES	WITNESS	TESTIMONY SUMMARY	DIRECT TESTIMONY ESTIMATE	CROSS-EXAM ESTIMATE
SOIL AND WATER RESOURCES	Major, Category II	FLACK, Mike AECOM HAGMAIER, Bill AECOM THOR, Trevor SM HARVEY, Jeffrey Harvey Consulting Group	Disagree with the Staff's assertion that project will impact Colorado River; groundwater monitoring; groundwater modeling; modifications to Draft Waste Discharge Requirements	1 hour	Staff – 1 hour
TRAFFIC AND TRANSPORTATION	Major, Category II	WILSON, John Wilson Engineering BALENTINE, Howard AECOM KELLY, Shawn AECOM MOSS, Doug Moss, Aeropacific THOR, Trevor SM	Disagree with Staff characterization regarding impacts to airport operations and flight	1 hour	Staff – 0.5 hour
TRANSMISSION LINE SAFETY AND NUISANCE	Minor, Category I	ARDOLINO, Richard, AECOM HOLLENBACHER, Ralph SM	Minor change to Condition of Certification regarding EMF guidelines, Submitted on Declaration	None	None
TRANSMISSION SYSTEM ENGINEERING	Minor, Category I	HOLLENBACHER, SM ARDOLINO, Richard AECOM	Disagrees with Staff conclusion that they cannot make finding of LORS without the Phase II Study, Submitted on Declaration	None	None
VISUAL RESOURCES	Major, Category II	PAULSON, Meryn AECOM BALENTINE, Howard, AECOM	Disagree with Staff Conclusion that BSPP will result in significant visual impacts	0.5 hour	0.5 hour

TABLE 1

**Blythe Solar Power Plant
Proposed Witness List**

TOPIC AREA	DISPUTES BETWEEN PARTIES	WITNESS	TESTIMONY SUMMARY	DIRECT TESTIMONY ESTIMATE	CROSS-EXAM ESTIMATE
ALTERNATIVES	Minor Category 1	DRAKER, Ray PVSI, LLC LUTTRELL, Mark AECOM	PVSI wishes for the Committee to include additional Project Objectives rejected by Staff	Declaration	None
AIR QUALITY	Minor Category 1	HAMEL, Richard HEAD, Sarah AECOM KINGSLEY, Russ AECOM	PVIS disagrees with Staff use of the federal PSD thresholds as CEQA significance thresholds and proposed minor changes to Conditions of Certification	Declaration	None
BIOLOGICAL RESOURCES	Major Dispute, Category II and Category III	KARL, Alice Alice Karl & Associates GRAHAM, Bill AECOM GUIGLIANO, Jennifer AECOM MCMILLAN, Scott AECOM ANGUIANO, Michael AECOM HARBIN-IRELAND, Angie AECOM	Disagreement with Staff on impacts and Conditions of Certification relating to ephemeral washes; characterization of desert tortoise habitat; Couch's Spadefoot Toad; cumulative impacts; decommissioning; effect of steam blows; Bighorn Sheep; plant mitigation; timing of mitigation and preconstruction surveys; Raven Management Plan fees; Burrowing Owl mitigation; plant mitigation; Mojave Fringe Toad Lizard mitigation; and Golden Eagle impacts PVSI also disputes the following areas with CURE	1	Staff – 1 hour Cashen – 0.5 hours Toure – 0.5 hours Bleich – 0.5 hours

TOPIC AREA	DISPUTES BETWEEN PARTIES	WITNESS	TESTIMONY SUMMARY	DIRECT TESTIMONY ESTIMATE	CROSS-EXAM ESTIMATE
			Couch's Spadefoot Toad; ephemeral washes; Gila Woodpecker; Bighorn Sheep; Coachella Valley Milkvetch; drainage design; and mitigation lands		
CULTURAL RESOURCES	None	JORDAN, Stacey AECOM VARGAS, Benjamin AECOM	Proposed Condition of Certification	0.5 hours	None
FACILITY DESIGN	None	DRACKER, Ray PVSI, LLC PETTO, Steve AECOM	Submitted on Declaration	None	None
GEOLOGY AND PALEONTOLOGY	None	FLACK, Mike AECOM CORSETTI, Cara SWCA	Submitted on Declaration	None	None
HAZARDOUS MATERIALS	Minor Category I	DUDASKO, Mike AECOM LUTTRELL, Mark AECOM	Modified Hazardous Materials List, Submitted on Declaration	None	None
LAND USE	Major Category II	INGRAM, Elizabeth SM GRAHAM, Bill AECOM	Disagrees with Staff on ultimate conclusion that the Project results in significant cumulative impacts to loss of open space; Airport Land Use Plan Consistency	0.5 hours	Staff – 0.5 hours

TOPIC AREA	DISPUTES BETWEEN PARTIES	WITNESS	TESTIMONY SUMMARY	DIRECT TESTIMONY ESTIMATE	CROSS-EXAM ESTIMATE
NOISE AND VIBRATION	None	GOODSON, Jeff AECOM PETTO, Steve AECOM LUTTRELL, Mark AECOM	Submitted on Declaration	None	None
POWER PLANT EFFICIENCY	None	DRAKER, Ray PVSI, LLC	Submitted on Declaration	None	None
POWER PLANT RELIABILITY	None	DRACKER, Ray PVSI, LLC	Submitted on Declaration	None	None
PROJECT DESCRIPTION	Minor, Category I	HARRON, Alice SM INGRAM, Elizabeth SM HOLLENBACHER, Ralph SM THOR, Trevor PVSI, LLC KELLY, Shawn AECOM	Minor revisions to reflect the current project description, Submitted on Declaration	None	None
PUBLIC HEALTH	Minor, Category I	HEAD, Sarah AECOM KINGSLEY, Russ AECOM	Minor corrections, Submitted on Declaration	None	None
SOCIOECONOMICS	None	HARRON, Alice SM INGRAM, Elizabeth SM LARSON, Dennis AECOM	Can rely on analysis performed in AFC	None	None

TOPIC AREA	DISPUTES BETWEEN PARTIES	WITNESS	TESTIMONY SUMMARY	DIRECT TESTIMONY ESTIMATE	CROSS-EXAM ESTIMATE
SOIL AND WATER RESOURCES	Major, Category II	FLACK, Mike AECOM HAGMAIER, Bill AECOM THOR, Trevor SM HARVEY, Jeffrey Harvey Consulting Group	Disagree with the Staff's assertion that project will impact Colorado River; groundwater monitoring; groundwater modeling; modifications to Draft Waste Discharge Requirements	1 hour	Staff – 1 hour
TRAFFIC AND TRANSPORTATION	Major, Category II	WILSON, John Wilson Engineering BALENTINE, Howard AECOM KELLY, Shawn AECOM MOSS, Doug Moss, Aeropacific THOR, Trevor SM	Disagree with Staff characterization regarding impacts to airport operations and flight	1 hour	Staff – 0.5 hour
TRANSMISSION LINE SAFETY AND NUISANCE	Minor, Category I	ARDOLINO, Richard, AECOM HOLLENBACHER, Ralph SM	Minor change to Condition of Certification regarding EMF guidelines, Submitted on Declaration	None	None
TRANSMISSION SYSTEM ENGINEERING	Minor, Category I	HOLLENBACHER, SM ARDOLINO, Richard AECOM	Disagrees with Staff conclusion that they cannot make finding of LORS without the Phase II Study, Submitted on Declaration	None	None
VISUAL RESOURCES	Major, Category II	PAULSON, Meryn AECOM BALENTINE, Howard, AECOM	Disagree with Staff Conclusion that BSPP will result in significant visual impacts	0.5 hour	0.5 hour

TOPIC AREA	DISPUTES BETWEEN PARTIES	WITNESS	TESTIMONY SUMMARY	DIRECT TESTIMONY ESTIMATE	CROSS-EXAM ESTIMATE
WASTE MANAGEMENT	Major, Category III	DUDASKO, Mike AECOM SWAHN, Frederick AECOM LUTTRELL, Mark AECOM	Disputes with CURE about UXO	0.5 hour	Hagemann – 0.5 hour
WORKER SAFETY	Major, Category II	HARRON, Alice SM ARVIDSON, Mike AECOM PETTO, Steve AECOM BAK, Daniel	Dispute with Staff about Fire Safety Risk and Mitigation	0.5 hour	0.5 hour

**Blythe Solar Power Project (09-AFC-06)
Exhibit List**

Exhibit	Witness	Brief Description	Topic	Stipulation	Offered	Admitted	Refused	CEC Use Only
Exhibit 1	All	Application for Certification Volumes I & II , dated August 24 2009, and docketed on August 24, 2009.	All					
Exhibit 2	Hamel Head Kingsley	Air Quality Modeling Files , dated August 2009, and docketed on August 31, 2009.	Air Quality					
Exhibit 3	Harron Ingram Hollenbacher Thor Kelley	Letter from Assembly Person V. Manuel Perez (Project Support Letter for PSPP & BSPP) , dated October 21, 2009, and docketed on October 26, 2009.	Project Description					
Exhibit 3	Harron Ingram Larson	Letter from Assembly Person V. Manuel Perez (Project Support Letter for PSPP & BSPP) , dated October 21, 2009, and docketed on October 26, 2009.	Socioeconomics					
Exhibit 4	Hamel Head Kingsley	Data Adequacy Supplement , dated October 26, 2009, and docketed on October 26, 2009.	Air Quality					
Exhibit 4	Graham Guigliano McMillan Anguiano Harbin-Ireland	Data Adequacy Supplement , dated October 26, 2009, and docketed on October 26, 2009.	Biological Resources					
Exhibit 4	Jordan	Data Adequacy	Cultural Resources					

**Blythe Solar Power Project (09-AFC-06)
Exhibit List**

	Vargas	Supplement , dated October 26, 2009, and docketed on October 26, 2009.						
Exhibit 4	Dracker	Data Adequacy Supplement , dated October 26, 2009, and docketed on October 26, 2009.	Power Plant Efficiency					
Exhibit 4	Flack Corsetti	Data Adequacy Supplement , dated October 26, 2009, and docketed on October 26, 2009.	Geology & Paleontology					
Exhibit 4	Harron Ingram Hollenbacher Thor Kelley	Data Adequacy Supplement , dated October 26, 2009, and docketed on October 26, 2009.	Project Description					
Exhibit 4	Dracker	Data Adequacy Supplement , dated October 26, 2009, and docketed on October 26, 2009.	Power Plant Reliability					
Exhibit 4	Flack Hagmaier Thor Harvey	Data Adequacy Supplement , dated October 26, 2009, and docketed on October 26, 2009.	Soil & Water Resources					
Exhibit 4	Hollenbacher Ardolino	Data Adequacy Supplement , dated October 26, 2009, and docketed on October 26, 2009.	Transmission System Engineering					
Exhibit 4	Paulson Balentine	Data Adequacy Supplement , dated October 26, 2009, and docketed on October 26, 2009.	Visual Resources Waste Management					
Exhibit 4	Dudasko	Data Adequacy	Waste					

**Blythe Solar Power Project (09-AFC-06)
Exhibit List**

	Luttrell	Supplement , dated October 26, 2009, and docketed on October 26, 2009.	Management					
Exhibit 5	Graham Guiguliano McMillan Anguiano Harbin-Ireland	Streamed Alteration Agreement Application , dated November 2009, and docketed on November 25, 2009.	Biological Resources					
Exhibit 5	Flack Hagmaier Thor Harvey	Streamed Alteration Agreement Application , dated November 2009, and docketed on November 25, 2009.	Soil & Water Resources					
Exhibit 6	Graham Guiguliano McMillan Anguiano Harbin-Ireland	Pre-Development Drainage Conditions Report , dated November 25, 2009, and docketed on November 30, 2009.	Biological Resources					
Exhibit 6	Flack Hagmaier Thor Harvey	Pre-Development Drainage Conditions Report , dated November 25, 2009, and docketed on November 30, 2009.	Soil & Water Resources					
Exhibit 7	Jordan Vargas	New Alternative Approach to Staff Review for Cultural , dated December 1, 2009, and docketed on December 1, 2009.	Cultural Resources					
Exhibit 8	Jordan Vargas	Selection of Cultural Resources Evaluation Approach , dated December 21, 2009, and docketed on	Cultural Resources					

**Blythe Solar Power Project (09-AFC-06)
Exhibit List**

		December 22, 2009.						
Exhibit 9	Hamel Head Kingsley	Palo Verde Solar I, LLC's Responses to CEC Data Request, Set 1 (1 through 260) , dated January 2010, and docketed on January 22, 2010.	Air Quality (1-29)					
Exhibit 9	Dracker Luttrell	Palo Verde Solar I, LLC's Responses to CEC Data Request, Set 1 (1 through 260) , dated January 2010, and docketed on January 22, 2010.	Alternatives (30-44)					
Exhibit 9	Graham Guigliano McMillan Anguiano Harbin-Ireland	Palo Verde Solar I, LLC's Responses to CEC Data Request, Set 1 (1 through 260) , dated January 2010, and docketed on January 22, 2010.	Biological Resources (45-97)					
Exhibit 9	Jordan Vargas	Palo Verde Solar I, LLC's Responses to CEC Data Request, Set 1 (1 through 260) , dated January 2010, and docketed on January 22, 2010.	Cultural Resources (98-152)					
Exhibit 9	Dracker	Palo Verde Solar I, LLC's Responses to CEC Data Request, Set 1 (1 through 260) , dated January 2010, and docketed on January 22, 2010.	Power Plant Efficiency (153)					
Exhibit 9	Flack Corsetti	Palo Verde Solar I, LLC's Responses to CEC Data Request, Set 1 (1 through	Geology & Paleontology (154-156)					

**Blythe Solar Power Project (09-AFC-06)
Exhibit List**

		260), dated January 2010, and docketed on January 22, 2010.						
Exhibit 9	Head Kinglsey	Palo Verde Solar I, LLC's Responses to CEC Data Request, Set 1 (1 through 260) , dated January 2010, and docketed on January 22, 2010.	Public Health (157-164)					
Exhibit 9	Dracker	Palo Verde Solar I, LLC's Responses to CEC Data Request, Set 1 (1 through 260) , dated January 2010, and docketed on January 22, 2010.	Power Plant Reliability (165)					
Exhibit 9	Flack Hagmaier Thor Harvey	Palo Verde Solar I, LLC's Responses to CEC Data Request, Set 1 (1 through 260) , dated January 2010, and docketed on January 22, 2010.	Soil & Water Resources (166-229)					
Exhibit 9	Hollenbacher Ardolino	Palo Verde Solar I, LLC's Responses to CEC Data Request, Set 1 (1 through 260) , dated January 2010, and docketed on January 22, 2010.	Transmission System Engineering (230-231)					
Exhibit 9	Paulson Balentine	Palo Verde Solar I, LLC's Responses to CEC Data Request, Set 1 (1 through 260) , dated January 2010, and docketed on January 22, 2010.	Visual Resources (232-252)					
Exhibit 9	Dudasko	Palo Verde Solar I, LLC's	Waste					

**Blythe Solar Power Project (09-AFC-06)
Exhibit List**

	Luttrell	Responses to CEC Data Request, Set 1 (1 through 260) , dated January 2010, and docketed on January 22, 2010.	Management (253-258)					
Exhibit 9	Harron Arvidson Petto Bak	Palo Verde Solar I, LLC's Responses to CEC Data Request, Set 1 (1 through 260) , dated January 2010, and docketed on January 22, 2010.	Worker Safety and Fire Protection (259-260)					
Exhibit 10	Graham Guiguliano McMillan Anguiano Harbin-Ireland	Application for the California Endangered Species Act Incidental Take Permit and Revised Desert Tortoise Technical Report , dated January 2010 and docketed on January 13, 2010.	Biological Resources					
Exhibit 11	Flack Hagmaier Thor Harvey	Attachment G WSA, (Attachment G- Water Supply Assessment of Response to DR 206) , dated January 2010 and docketed on January 18, 2010.	Soil & Water Resources					
Exhibit 12	Hamel Head Kingsley	Palo Verde Solar I, LLC's Supplemental Responses to CEC Data Request Set 1 , dated January 2010, and docketed on January 22, 2010.	Air Quality (5, 10, 13, 27, and 28)					
Exhibit 12	Graham Guiguliano McMillan	Palo Verde Solar I, LLC's Supplemental Responses to CEC Data Request Set 1 ,	Biological Resources (69)					

**Blythe Solar Power Project (09-AFC-06)
Exhibit List**

	Anguiano Harbin-Ireland	dated January 2010, and docketed on January 22, 2010.						
Exhibit 12	Paulson Balentine	Palo Verde Solar I, LLC's Supplemental Responses to CEC Data Request Set 1 , dated January 2010, and docketed on January 22, 2010.	Visual Resources (232-252)					
Exhibit 13	Hamel Head Kingsley	Mojave Desert Air Quality Management District's Preliminary Determination of Compliance , dated January 28, 2010 and docketed on January 29, 2010.	Air Quality					
Exhibit 14	Jordan Vargas	Palo Verde Solar I, LLC's Data Responses to CEC Queries & Attachment DR-CR-120a & b (Cultural Resources Impact Blocks) , dated January 2010, and docketed on January 29, 2010.	Cultural Resources					
Exhibit 15	Graham Guigliano McMillan Anguiano Harbin-Ireland	Palo Verde Solar I, LLC's Data Response to DR-BIO-58 (Post Development Drainage Conditions Report) , dated January 29, 2010 and docketed on January 29, 2010.	Biological Resources					
Exhibit 15	Flack Hagmaier Thor	Palo Verde Solar I, LLC's Data Response to DR-BIO-58 (Post Development	Soil & Water Resources					

**Blythe Solar Power Project (09-AFC-06)
Exhibit List**

	Harvey	Drainage Conditions Report), dated January 29, 2010 and docketed on January 29, 2010.						
Exhibit 16	Graham Guigliano McMillan Anguiano Harbin-Ireland	Report of Conversation (Between S. Sanders & J. Mace (United Army Corps of Engineers)) Regarding Status of Jurisdictional Determination , dated January 28, 2010 and docketed on February 1, 2010.	Biological Resources					
Exhibit 17	Hollenbacher Ardolino	Palo Verde Solar I, LLC's Responses to CEC January 15, 2010 and January 20, 2010 E-mail Queries from CEC Staff, Additional Info Regarding Transmission System Engineering , dated February 2010, and docketed on February 3, 2010.	Transmission System Engineering					
Exhibit 18	Graham Guigliano McMillan Anguiano Harbin-Ireland	Palo Verde Solar I, LLC's Response to January 14, 2010 Workshop Query and January 29, 2010 Email Query , dated February 2010, and docketed on February 4, 2010.	Biological Resources					
Exhibit 18	Jordan Vargas	Palo Verde Solar I, LLC's Response to January 14, 2010 Workshop Query and January 29, 2010 Email	Cultural Resources					

**Blythe Solar Power Project (09-AFC-06)
Exhibit List**

		Query , dated February 2010, and docketed on February 4, 2010.						
Exhibit 18	Wilson Balentine Kelly Moss Thor	Palo Verde Solar I, LLC's Response to January 14, 2010 Workshop Query and January 29, 2010 Email Query , dated February 2010, and docketed on February 4, 2010.	Traffic & Transportation					
Exhibit 19	Hamel Head Kingsley	Responses to January 14, 2010 CEC Workshop Queries , dated February 2010, and docketed on February 8, 2010.	Air Quality					
Exhibit 20	Graham Guigliano McMillan Anguiano Harbin-Ireland	Responses to January 28, 2010 CEC Email Queries , dated February 2010, and docketed on February 11, 2010.	Biological Resources					
Exhibit 21	Flack Hagmaier Thor Harvey	Responses to January 14, 2010 CEC Workshop Queries , dated February 2010, and docketed on February 11, 2010.	Soil & Water Resources					
Exhibit 22	Ingram Graham	Letter from Riverside County Planning Department (Re: Comments on AFC and NOI for BSPP & PSPP) , dated February 16, 2010, and docketed on February 17, 2010.	Land Use					

**Blythe Solar Power Project (09-AFC-06)
Exhibit List**

Exhibit 23	Hamel Head Kingsley	Heat Transfer Fluid Emissions Conference Call Record of Conversation (Between W. Walters (Aspen) and CEC, Abengoa Solar, Inc, Abener N. America, Atmospheric Dynamics & Solutia, Inc), dated January 27, 2010, and docketed on February 24, 2010.	Air Quality					
Exhibit 24	Hamel Head Kingsley	Palo Verde Solar I, LLC's Comments on the Preliminary Determination of Compliance, dated February 26, 2010, and docketed on March 3, 2010.	Air Quality					
Exhibit 25	Wilson Balentine Kelly Moss Thor	Riverside County Airport Land Use Commission (RCALUC) Application for Major Land Use Action Review, dated February 2010, and docketed on March 3, 2010.	Traffic & Transportation					
Exhibit 26	Graham Guigliano McMillan Anguiano Harbin-Ireland	Palo Verde Solar I, LLC's Draft Biological Assessment, dated March 2010, and docketed on March 8, 2010.	Biological Resources					
Exhibit 27	Flack Hagmaier Thor Harvey	Palo Verde Solar I, LLC's Responses to January 14, 2010 CEC Workshop Queries (Groundwater),	Soil & Water Resources					

**Blythe Solar Power Project (09-AFC-06)
Exhibit List**

		dated March 2010, and docketed on March 11, 2010.						
Exhibit 28	Graham Guigliano McMillan Anguiano Harbin-Ireland	Palo Verde Solar I, LLC's Issues Statement for April 15, 2010 Status Conference , dated April 12, 2010, and docketed on April 12, 2010.	Biological Resources					
Exhibit 28	Wilson Banentine Kelly Moss Thor	Palo Verde Solar I, LLC's Issues Statement for April 15, 2010 Status Conference , dated April 12, 2010, and docketed on April 12, 2010.	Traffic & Transportation					
Exhibit 28	Paulson Balentine	Palo Verde Solar I, LLC's Issues Statement for April 15, 2010 Status Conference , dated April 12, 2010, and docketed on April 12, 2010.	Visual Resources					
Exhibit 28	Flack Hagmaier Thor Harvey	Palo Verde Solar I, LLC's Issues Statement for April 15, 2010 Status Conference , dated April 12, 2010, and docketed on April 12, 2010.	Soil & Water Resources					
Exhibit 29	Harron Ingram Hollenbacher Thor Kelly	Palo Verde Solar I, LLC's Initial Comments on the SA, DEIS , dated April 19, 2010, and docketed on April 19, 2010.	Project Description					
Exhibit 29	Dracker Luttrell	Palo Verde Solar I, LLC's Initial Comments on the SA, DEIS , dated April 19, 2010, and docketed on April 19,	Alternatives					

**Blythe Solar Power Project (09-AFC-06)
Exhibit List**

		2010.						
Exhibit 29	Hamel Head Kingsley	Palo Verde Solar I, LLC's Initial Comments on the SA, DEIS , dated April 19, 2010, and docketed on April 19, 2010.	Air Quality					
Exhibit 29	Graham Guigliano McMillan Anguiano Harbin-Ireland	Palo Verde Solar I, LLC's Initial Comments on the SA, DEIS , dated April 19, 2010, and docketed on April 19, 2010.	Biological Resources					
Exhibit 29	Jordan Vargas	Palo Verde Solar I, LLC's Initial Comments on the SA, DEIS , dated April 19, 2010, and docketed on April 19, 2010.	Cultural Resources					
Exhibit 29	Dudasko Luttrell	Palo Verde Solar I, LLC's Initial Comments on the SA, DEIS , dated April 19, 2010, and docketed on April 19, 2010.	Hazardous Materials					
Exhibit 29	Ingram Graham	Palo Verde Solar I, LLC's Initial Comments on the SA, DEIS , dated April 19, 2010, and docketed on April 19, 2010.	Land Use					
Exhibit 29	Goodson Petto Luttrell	Palo Verde Solar I, LLC's Initial Comments on the SA, DEIS , dated April 19, 2010, and docketed on April 19, 2010.	Noise & Vibration					
Exhibit 29	Flack Hagmaier	Palo Verde Solar I, LLC's Initial Comments on the SA,	Soil & Water Resources					

**Blythe Solar Power Project (09-AFC-06)
Exhibit List**

	Thor Harvey	DEIS , dated April 19, 2010, and docketed on April 19, 2010.						
Exhibit 29	Wilson Balentine Kelly Moss Thor	Palo Verde Solar I, LLC's Initial Comments on the SA, DEIS , dated April 19, 2010, and docketed on April 19, 2010.	Traffic & Transportation					
Exhibit 29	Paulson Balentine	Palo Verde Solar I, LLC's Initial Comments on the SA, DEIS , dated April 19, 2010, and docketed on April 19, 2010.	Visual Resources					
Exhibit 29	Dudasko Luttrell	Palo Verde Solar I, LLC's Initial Comments on the SA, DEIS , dated April 19, 2010, and docketed on April 19, 2010.	Waste Management					
Exhibit 29	Harron Arvidson Petto Bak	Palo Verde Solar I, LLC's Initial Comments on the SA, DEIS , dated April 19, 2010, and docketed on April 19, 2010.	Worker Safety					
Exhibit 29	Dracker	Palo Verde Solar I, LLC's Initial Comments on the SA, DEIS , dated April 19, 2010, and docketed on April 19, 2010.	Power Plant Reliability					
Exhibit 30	Graham Guigliano McMillan Anguiano Harbin-Ireland	Palo Verde Solar I, LLC's Biological Resources Spring Survey Protocols , dated April 2010, and docketed on June 11, 2010.	Biological Resources					

**Blythe Solar Power Project (09-AFC-06)
Exhibit List**

Exhibit 31	Graham Guigliano McMillan Anguiano Harbin-Ireland	Comments on the Draft Desert Tortoise Relocation/ Translocation Plan , dated April 15, 2010, and docketed on April 29, 2010.	Biological Resources					
Exhibit 32	Wilson Balentine Kelly Moss Thor	County of Riverside County Airport Land Use Commission May 2010 Staff Report , dated May 2010, and docketed on May 10, 2010.	Traffic & Transportation					
Exhibit 33	Graham Guigliano McMillan Anguiano Harbin-Ireland	Palo Verde Solar I, LLC's Draft Summary Preliminary Spring 2010 Survey Results for Desert Tortoise, Rare Plants , and Jurisdictional Waters, dated May 7, 2010, and docketed on May 11, 2010.	Biological Resources					
Exhibit 34	Harron Arvidson Petto Bak	Responses to Questions from CEC April 28, 29 and May 7 Workshops Re: Worker Safety, Hazardous Materials, and Water Resources , dated May 13, 2010, and docketed May 13, 2010.	Worker Safety					
Exhibit 34	Dudasko Luttrell	Responses to Questions from CEC April 28, 29 and May 7 Workshops Re: Worker Safety, Hazardous Materials, and Water	Hazardous Materials					

**Blythe Solar Power Project (09-AFC-06)
Exhibit List**

		Resources , dated May 13, 2010, and docketed May 13, 2010.						
Exhibit 34	Flack Hagmaier Thor Harvey	Responses to Questions from CEC April 28, 29 and May 7 Workshops Re: Worker Safety, Hazardous Materials, and Water Resources , dated May 13, 2010, and docketed May 13, 2010.	Soil & Water Resources					
Exhibit 35	Harron Arvidson Petto Bak	Responses to Questions from CEC April 28, 29 and May 7 Workshops Re: Worker Safety & Hazardous Materials , dated May 14, 2010, and docketed on May 14, 2010.	Worker Safety					
Exhibit 35	Dudasko Luttrell	Responses to Questions from CEC April 28, 29 and May 7 Workshops Re: Worker Safety & Hazardous Materials , dated May 14, 2010, and docketed on May 14, 2010.	Hazardous Materials					
Exhibit 36	Harron Arvidson Petto Bak	Responses to April 28, 29 & May 7 Workshops Re: Operation Phase Fire Protection , dated May 14, 2010, and docketed on May 14, 2010.	Worker Safety					
Exhibit 36	Dudasko Luttrell	Responses to April 28, 29 & May 7 Workshops Re: Operation Phase Fire	Hazardous Materials					

**Blythe Solar Power Project (09-AFC-06)
Exhibit List**

		Protection , dated May 14, 2010, and docketed on May 14, 2010.						
Exhibit 37	Harron Arvidson Petto Bak	Responses to April 28, 29 & May 7 Workshops Re: HTF Fluid (Burn Rate Discussion) , dated May 14, 2010, and docketed on May 14, 2010.	Worker Safety					
Exhibit 37	Dudasko Luttrell	Responses to April 28, 29 & May 7 Workshops Re: HTF Fluid (Burn Rate Discussion) , dated May 14, 2010, and docketed on May 14, 2010.	Hazardous Materials					
Exhibit 38	Graham Guiguliano McMillan Anguiano Harbin-Ireland	Response to CEC April 28, 29 and May 7 Workshop Queries Re: Southern CA Edison Colorado River Substation Project Description , dated April 15, 2010, and docketed on May 17, 2010.	Biological Resources					
Exhibit 38	Hollenbacher Ardolino	Response to CEC April 28, 29 and May 7 Workshop Queries Re: Southern CA Edison Colorado River Substation Project Description , dated April 15, 2010, and docketed on May 17, 2010.	Transmission System					
Exhibit 38	Dracker	Response to CEC April 28, 29 and May 7 Workshop Queries Re: Southern CA	Power Plant Reliability					

**Blythe Solar Power Project (09-AFC-06)
Exhibit List**

		Edison Colorado River Substation Project Description , dated April 15, 2010, and docketed on May 17, 2010.						
Exhibit 39	Flack Hagmaier Thor Harvey	Application/ Report of Waste Discharge -- Proposed Evaporation Ponds , dated May 14, 2010, and docketed on May 17, 2010.	Soil & Water Resources					
Exhibit 39	Harron Ingram Hollenbacher Thor Kelly	Application/ Report of Waste Discharge -- Proposed Evaporation Ponds , dated May 14, 2010, and docketed on May 17, 2010.	Project Description					
Exhibit 40	Flack Hagmaier Thor Harvey	Assessment of Impacts from a Revision in Well Configuration for Proposed Water Supply , dated April 17, 2010, and docketed on May 17, 2010.	Soil & Water Resources					
Exhibit 41	Hamel Head Kingsley	Mojave Desert Air Quality Management District's Revised Preliminary Determination of Compliance , dated May 25, 2010, and docketed on May 26, 2010.	Air Quality					
Exhibit 42	Harron	Notification of Revision	Project Description					

**Blythe Solar Power Project (09-AFC-06)
Exhibit List**

	Ingram Hollenbacher Thor Kelly	Memorandum—Blythe Solar Power Project Gen-Tie , dated May 28, 2010 and docketed on May 28, 2010.						
Exhibit 42	Hollenbacher Ardolino	Notification of Revision Memorandum—Blythe Solar Power Project Gen-Tie , dated May 28, 2010 and docketed on May 28, 2010.	Transmission System Engineering					
Exhibit 43	Graham Guigliano McMillan Anguiano Harbin-Ireland	Responses to CEC April 28, 29 and May 7, 2010 CEC Workshop Queries Re: Biological Resources (Preliminary Spring 2010 Biological Survey Results) , dated May 14, 2010, and docketed on May 20, 2010.	Biological Resources					
Exhibit 44	Hamel Head Kingsley	Revised Health Risk Assessment for the Preliminary Determination of Compliance , dated May 2010, and docketed on May 20, 2010.	Air Quality					
Exhibit 44	Head Kingsley	Revised Health Risk Assessment for the Preliminary Determination of Compliance , dated May 2010, and docketed on May 20, 2010.	Public Health					
Exhibit 45	Ingram Graham	Land Use Consistency Letters , dated June 11, 2010, and docketed on June 11, 2010.	Land Use					

**Blythe Solar Power Project (09-AFC-06)
Exhibit List**

Exhibit 46	Graham Guiguliano McMillan Anguiano Harbin-Ireland	Colorado River Substation Biological Resources Survey Results and Impact Calculations , dated June 14, 2010, and docketed on June 14, 2010.	Biological Resources					
Exhibit 47	Graham Guiguliano McMillan Anguiano Harbin-Ireland	Biological Resources 2010 Surveys Data , dated June 14, 2010, and docketed on June 14, 2010.	Biological Resources					
Exhibit 48	Wilson Balentine Kelly Moss Thor	Responses to RCALUC's March 22, 2010 Comments Re: RCALUC Application, April 13, 2010 Email Correspondence, and May 13, 2010 Meeting Comments , dated May 2010, and docketed on June 15, 2010.	Traffic & Transportation					
Exhibit 49	Wilson Balentine Kelly Moss Thor	Response to RCALUC's June 10, 2010 Request Re: Additional Graphics Depicting GenTie Clearance from 3-Degree Glide Slope for Runway 08 , dated June 15, 2010 and docketed on June 15, 2010.	Traffic & Transportation					
Exhibit 50	Harron Ingram Hollenbacher Thor Kelley	Blythe Solar Power Project Utility Corridors, Preliminary , dated June 16, 2010, and docketed on June 15, 2010.	Project Description					

**Blythe Solar Power Project (09-AFC-06)
Exhibit List**

Exhibit 51	Wilson Balentine Kelly Moss Thor	Public Letters to the ALUC Re: BSPP , dated May 2010 and June 2010, and docketed on June 15, 2010.	Traffic & Transportation					
Exhibit 52	All	PVSI, LLCs Opening Testimony Package , dated June 11, 2010, and docketed on June 11, 2010.	All					
Exhibit 53	All	PVSI, LLCs Rebuttal Testimony Package , dated June 16, 2010, and docketed on June 16, 2010.	All					
Exhibit 54	Wilson Balentine Kelly Moss Thor	Computational Fluid Dynamics Modeling of an Air Cooled Condenser in a Convectively Unstable Boundary Layer , dated June 16, 2010, and docketed on June 16, 2010.	Traffic and Transportation					
Exhibit 55	Graham Guiguliano McMillan Anguiano Harbin-Ireland	Western Burrowing Owl Technical Report , dated June 16, 2010, and docketed on June 16, 2010.	Biological Resources					
Exhibit 56	Graham Guiguliano McMillan Anguiano Harbin-Ireland	BSPP Biological Resources Technical Report , dated June 16, 2010, and docketed on June 16, 2010.	Biological Resources					

**Blythe Solar Power Project (09-AFC-06)
Exhibit List**

Exhibit 57	Hamel Head Kingsley	HTF Fugitive Component Emission Factor Determination , dated June 16, 2010, and docketed on June 16, 2010.	Air Quality					
Exhibit 58	Graham Guiguliano McMillan Anguiano Harbin-Ireland	BSPP Golden Eagle Survey Results , dated June 16, 2010, and docketed on June 16, 2010.	Biological Resources					
Exhibit 59	Wilson Balentine Kelly Moss Thor	Letter from D. Moss to H. Balentine Re: GenTie Location at Blythe Airport , dated June 15, 2010, and docketed on June 16, 2010.	Traffic & Transportation					



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

Docket No. 09-AFC-6

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(Revised 5/3/10)

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DECLARATION OF SERVICE

I, Marie Mills, declare that on June 16, 2010, I served and filed copies of the attached **PALO VERDE SOLAR I, LLC's PREHEARING CONFERENCE STATEMENT**, dated June 16, 2010. 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:
[\[http://www.energy.ca.gov/sitingcases/solar_millennium_blythe\]](http://www.energy.ca.gov/sitingcases/solar_millennium_blythe)

The document has 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 or by depositing in the United States mail at 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. 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.



Marie Mills