<b>Docket Number:</b>	79-AFC-04C
Project Title:	Compliance - Application for Certification of DWR Bottlerock Geotherma Project
TN #:	200724
<b>Document Title:</b>	V.V. & J. Coleman LLC Comments to Staff Analysis
<b>Description:</b>	N/A
Filer:	Mark Peterson
Organization:	Diepenbrock Elkin LLP
<b>Submitter Role:</b>	Other Interested Person
Submission Date:	10/2/2013 3:57:44 PM
<b>Docketed Date:</b>	10/2/2013



JOHN V. "JACK" DIEPENBROCK
KAREN L. DIEPENBROCK
KEITH W. McBRIDE
BRADLEY J. ELKIN
EILEEN M. DIEPENBROCK
GENE K. CHEEVER
JENNIFER L. DAUER
CHRIS A. McCANDLESS
DAVID A. DIEPENBROCK
MARK E. PETERSON
JONATHAN R. MARZ

Mark E. Peterson

mep@diepenbrock.com

916-492-5060 (direct) 916-446-2640 (fax)

www.diepenbrock.com

October 2, 2013

## **VIA E-FILING**

The Honorable Karen Douglas, Presiding Member The Honorable Janea Scott, Associate Member California Energy Commission 1516 Ninth Street Sacramento, CA 95814

Re:

Bottle Rock Geothermal Power Plant Amendment (Docket No. 79-AFC-04C) Project Landowner Comments

**Dear Commissioners:** 

Project Landowner V.V. & J. Coleman, LLC ("Coleman LLC") has reviewed the Staff Analysis of Proposed Modifications filed in the above referenced proceeding on September 6, 2013. Coleman LLC is concerned that the requirement as proposed by staff is arbitrary and does not properly weigh the interests of all concerned. More specifically, for example, the bond amount is not reasonably related to the actual costs that would be incurred in decommissioning the plant and the time frame in which it is to be funded creates an unnecessary burden on Bottle Rock. Coleman LLC intends to attend the Public Workshop scheduled for October 4, 2013 and will present additional oral comments at that time.

Respectfully,

Mark E. Peterson

MEP:mp