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INFEASIBILITY OF PV AND SOLAR TROUGH ALTERNATIVES

- The PV and Solar Trough Alternatives are Infeasible for this Applicant
 - The Commission’s required finding of infeasibility should take into account “specific economic, social, or other considerations” not just economics.
- The PSEGS technology was selected to meet Power Purchase Agreement (PPA) requirements
 - The Alternatives would likely require an amendment to or new PPAs through an annual competitive solicitations, which could take up to 24 months to bid, negotiate, execute and obtain CPUC Approval, if even feasible
- Large Generator Interconnection Agreement (LGIA) pertaining to PSEGS is technology specific
 - Change to technology type would significantly delay financing and construction, due to re-negotiation of LGIA and Material Modification review by CAISO
- Alternatives would require re-initiation of time-intensive permit processes
 - Solar Trough Alternative would need to be redesigned since original PSPP trough design is proprietary and unavailable
 - PV Project could not be processed by CEC as an amendment and would require new permit analysis with County of Riverside
 - Both Alternatives would require new Plans of Development with BLM and would require reissuance of NEPA and Plan Amendment documents