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STATE OF CALIFORNIA

Energy Resources
Conservation and Development Commission

In the Matter of:

DOCKET NO: 09-AFC-7C

Petition For Amendment for the
**PALEN SOLAR ELECTRIC
GENERATING SYSTEM**

**PALEN SOLAR HOLDINGS, LLC'S
PREHEARING CONFERENCE
STATEMENT**

INTRODUCTION

Palen Solar Holdings, LLC (PSH), in accordance with 20 CCR § 1718.5 and the Committee Order dated June 2, 2014, hereby files its Prehearing Conference Statement for its Petition For Amendment for the Palen Solar Electric Generating System (PSEGS). PSH is prepared to proceed to evidentiary hearing on all topic areas identified in the June 2, 2014 Committee Order.

As described in Exhibit 1166, PSH is proposing to construct Phase I now and accept a condition on the filing and approval of a future amendment to incorporate Thermal Energy Storage (TES) into Phase II. Exhibit 1167 is a Revised Phasing Plan which revises the early phasing approach to clearly identify that Phase I includes the westernmost unit and all the linear facilities, construction laydown, and common areas. Phase II will be the easternmost unit. PSH believes that the practical effect of this Revised Phasing Plan and the proposed condition governing construction of Phase II will result in additional project benefits and additional certainty in the area of potential avian impacts. PSH proposes to maintain the \$1.8 Million upfront mitigation funding of Condition of Certification **BIO-16a**.

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

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

PSH believes that all topic areas (and/or disciplines) identified in the June 2, 2014 Committee Order are complete and ready for adjudication at the Evidentiary Hearings.

B. Topic Areas Not Ready to Proceed to Evidentiary Hearing

None.

C. Disputed Topic Areas Requiring Adjudication

PSH characterizes the topic areas into the following four categories:

Category 1. Areas where PSH agrees with Staff's analysis, ultimate conclusions, and Proposed Conditions of Certification.

Category 2. Areas where PSH requested minor modifications to Staff's Proposed Conditions of Certification where PSH believes live testimony is not warranted because the written testimony is clear and no further explanation is necessary.

Category 3. Topic areas where PSH disagrees with Staff's analysis and ultimate conclusions and/or Conditions of Certification where live direct testimony and cross-examination are warranted.

Category 4. Topic areas where PSH disagrees with Interveners' positions where live direct testimony and cross-examination are warranted.

Brief descriptions of the disputes are provided below and are summarized in Table 1.

D. Proposed Witnesses and Testimony

Table 1 identifies the witnesses who PSH intends to call to offer direct testimony, includes a brief summary of the subject areas of the testimony, and provides an estimate of the amount of time necessary for direct live testimony.

E. Cross-Examination

Table 1 identifies those witnesses who PSH would like to cross-examine and includes an estimate of the amount of time necessary for cross-examination. PSH does not challenge the qualifications of any witness to provide expert

testimony in accordance with the testimony received to date, but reserves the right to identify levels of experience and degree of qualification. A brief description of the subject areas in dispute that will encompass the scope of cross-examination is included in Table 1. While PSH understands that the Committee will conduct the proceedings using an informal hearing procedure, PSH strongly objects to such procedure, as it will result in the loss of PSH's due process rights to conduct relevant cross-examination.

F. Exhibit List

Table 2 is PSH's Proposed Exhibit List.

G. Findings of Override

PSH requests Findings of Override in the area of Cultural Resources, Visual Resources, and Biological Resources. For Biological Resources, the request is based solely on the potential that avian impacts may not be mitigated to levels of less than significance, considering the uncertainty surrounding impacts, the effectiveness of deterrent methods, and the results of mitigation efforts.

H. Scheduling

In order to facilitate the schedule, PSH again requests that 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 and, if so, determine the scope of those briefs.

Based on our review of all the Opening and Rebuttal Testimony, PSH believes that the topics can be adjudicated in two days. PSH proposes that the Committee structure the evidentiary hearings in the following order:

Tuesday, July 29, 2014

1. Project Description
 - a. Revised Phasing Plan, Exhibit 1167
 - b. Thermal Energy Storage, if testimony is necessary
 - c. Natural Gas Consumption
 - d. Solar Flux Temperature and Gradient
2. Traffic and Transportation and Visual Resources
 - a. Glint and Glare as it relates to ISEGS Pilot Complaints
3. Cultural Resources
 - a. Condition of Certification **CUL-1**
4. Public Comment

Wednesday, July 30, 2014

1. Biological Resources
 - a. Avian
 - i. Impacts
 - ii. Mitigation
 - iii. Deterrent Methods
 - iv. Curtailment
 - b. Insects
 - c. Condition of Certification **BIO-29** Revisions
2. Alternatives
3. Overriding Considerations
4. Public Comment

I. Proposed Modifications to Conditions of Certification

PSH has proposed revisions to the following Conditions of Certification:

- New Condition **PD-1** which conditions construction of Phase II on the filing and approval of a future amendment to add thermal energy storage to Phase II. This proposed revision is contained in the body of Exhibit 1166.
- Revised Condition of Certification **SOIL&WATER-3** to split the allowable construction and operation groundwater quantities between Phase I and Phase II. No additional water use beyond what the original condition allowed is being requested. This proposed revision is contained in Exhibit 1169.
- Revised Condition of Certification **BIO-29** includes tables of disturbance acreages and mitigation requirements by habitat. The tables and the references in the condition have been revised to reflect the current Revised Phasing Plan, Exhibit 1167. This proposed revision is contained in Exhibit 1170.
- Revised Condition of Certification **CUL-1**, which has been modified to address the Committee's direction provided at the Presiding Member's Proposed Decision Conference and to address the comments provided by tribal representatives at the April 8, 2014 Staff Workshop. This proposed revision is contained in Exhibit 1172.

Staff proposed revisions to Condition of Certification **BIO-16b** which are unwarranted. The specific revision to increase the length of monitoring from 3 years to 5 years is burdensome and unnecessary. When the PSEGS Phase I

becomes operational, there would have been at a minimum multiple years of approved monitoring data collected from ISEGS. The additional 3 years of data that will be collected from 2017 to 2020 from PSEGS, combined with what is learned from the ISEGS data, will be sufficient for the PSEGS Technical Advisory Committee (TAC) to understand the species and circumstances contributing to solar flux avian mortality in order to implement the adaptive management strategy of the Bird and Bat Conservation Strategy (BBCS) and direct the mitigation funds provided under Condition of Certification **BIO-16a**.

At this time, PSH is still considering Staff's modifications to include insect monitoring and is not yet ready to render an opinion. However, PSH will provide such opinion at evidentiary hearings.

Staff proposed revisions to Condition of Certification **TRANS-7** that are too prescriptive and unwarranted. Staff's revisions reduce the flexibility of the condition. The current condition requires the project owner to investigate potential complaints by pilots. Once a legitimate complaint is investigated and the cause is determined, the condition requires development of methods for correction. Staff's revisions specify solutions prior to a finding that any complaint is legitimate or a determination of the specific cause of any legitimate complaint, should one be received. Staff stated that the purpose of the revisions is to address pilot complaints of glare from ISEGS. But Staff's proposed revisions ignore the fact that the complaint resolution process for ISEGS worked under a condition that does not include Staff's currently proposed revisions. As shown in Exhibit 1191, ISEGS received and investigated pilot complaints which resulted in a report by Sandia Corporation making several recommendations specific to ISEGS. We understand that ISEGS is revising its Heliostat Positioning Plan to incorporate those recommendations. The revisions to the PSEGS **TRANS-7** are simply not necessary to achieve a similar result if PSEGS receives pilot complaints. Therefore, the Committee should reject Staff's proposed revisions and need not change the findings of the Presiding Member's Proposed Decision (PMPD) due to the pilot complaints at ISEGS.

No other party has proposed any revisions to Conditions of Certification.

Table 1 summarizes the disputes that require adjudication.

CONCLUSION

PSH has provided significant new information on avian impacts, mitigation and deterrent methods; infeasibility of curtailment and of alternatives; ISEGS pilot complaints; and the many benefits of the PSEGS that warrant overriding any significant cultural, visual and avian impacts. The additional evidence is sufficient to support the revision of the PMPD to recommend approval. PSH urges the Committee to issue the Revised PMPD on a schedule to support an October Final Decision.

Dated: July 21, 2014

Respectfully Submitted,



Scott A. Galati
Counsel to Palen Solar Holdings, LLC

TABLE 1

PALEN SOLAR HOLDINGS, LLC
Proposed Witness List

TOPIC AREA	DISPUTES BETWEEN PARTIES	WITNESS PANEL	TESTIMONY SUMMARY	DIRECT TESTIMONY ESTIMATE	CROSS-EXAM ESTIMATE
PROJECT DESCRIPTION	Category 1	Charles Turlinski, PSH Matthew Stucky, PSH Bruce Kelly, Abengoa Solar	Describe Phasing Plan and Condition; Affirm Additional Natural Gas Not Needed; Thermal Energy Storage; Solar Flux and Temperature Gradient	<u>Total Time</u> 20 minutes	<u>None</u>
BIOLOGICAL RESOURCES		Matthew Stucky, PSH Charles Turlinski, PSH	See Subcategory for description of dispute.	<u>Total Time</u> 2 hours and 45 minutes	<u>Total Time</u> 1 hour and 20 minutes
<u>Mitigation Acreage</u>	Category 2	Chris Morris, Abengoa Solar Gustavo Buhacoff, BrightSource Binyamin Koretz, BrightSource Wally P. Erickson, WEST	<u>Category 2</u> – PSH has proposed modifications to Condition of Certification BIO-29 tables to reflect the Revised Phasing Plan disturbance acreages and mitigation requirements	10 minutes	None
<u>Insects</u>	Categories 3 and 4	Dr. Ken Levenstein, WEST Dr. Richard S. Kaae Andrea Grenier,	<u>Category 3</u> PSH disagrees with Staff's insect monitoring requirements <u>Category 4</u> PSH disagrees with Dr. Pratt's assessment of insect impacts	10 minutes 10 minutes	5 minutes for Staff witnesses 10 minutes for Dr. Pratt

TOPIC AREA	DISPUTES BETWEEN PARTIES	WITNESS PANEL	TESTIMONY SUMMARY	DIRECT TESTIMONY ESTIMATE	CROSS-EXAM ESTIMATE
<u>Avian Impacts and Mitigation</u>	Categories 3 and 4	Grenier & Associates Elwood G. Norris, Turtle Beach Dr. Karen Voltura, DeTect	<u>Category 3</u> PSH disagrees with Staff's: Solar Flux Modeling; Solar Flux Threshold; Characterization of ISEGS mortality data; Increased monitoring requirements (time, frequency and area); Mitigation Opportunities <u>Category 4</u> PSH disagrees with the testimony of Dr. Smallwood	1 hour and 30 minutes	30 minutes for Staff witnesses 15 minutes for Dr. Smallwood
<u>Deterrent Methods</u>	Categories 3 and 4		PSH disagrees with Staff and CBD's contention that deterrent methods cannot be effective	30 minutes	5 minutes for Staff 5 minutes for Dr. Smallwood
<u>Infeasibility of Curtailment</u>	Category 4		PSH disagrees with any contention that curtailment is feasible	15 minutes	10 minutes for Interveners or Staff
TRAFFIC AND TRANSPORTATION	Category 3	Gustavo Buhacoff, BrightSource Matt Binner, Pilot	PSH disagrees with Staff's conclusion that the pilot complaints at ISEGS warrant modifications to Condition of Certification TRANS-7 or that the potential glint and glare impacts to pilots are not mitigated by Condition of	Total Time 30 minutes	Total Time 15 minutes

TOPIC AREA	DISPUTES BETWEEN PARTIES	WITNESS PANEL	TESTIMONY SUMMARY	DIRECT TESTIMONY ESTIMATE	CROSS-EXAM ESTIMATE
			Certification TRANS-7		
CULTURAL RESOURCES	Category 3	Mary Barger, Centerline Fred Nials, Centerline	PSH disagrees with the Staff Proposed Condition of Certification CUL-1 total amount of funding and proposed allocation of funding, which is nonresponsive to tribal comments	Total Time 15 minutes	Total Time 10 minutes
ALTERNATIVES	Categories 3 and 4	Charles Turlinski, PSH Matthew Stucky, PSH Arne Olson, E3	<u>Category 3</u> PSH disagrees with Staff's conclusion regarding the infeasibility of the Alternatives and Staff's Project Objectives. <u>Category 4</u> PSH disagrees with the testimony of Bill Powers regarding infeasibility of Alternatives	Total Time 15 minutes	Total Time 15 minutes 5 minutes for Staff 10 minutes for Bill Powers
OVERRIDING CONSIDERATIONS	Categories 3 and 4	Charles Turlinski, PSH Matt Stucky, PSH David Schlosberg, BrightSource Bruce Kelly, Abengoa Solar	<u>Category 3</u> PSH disagrees with the Staff's opinion that the benefits of the PSEGS do not outweigh the potential significant impacts <u>Category 4</u> PSH disagrees with intervener contentions that	Total Time 30 minutes	Total Time 15 minutes for Staff

TOPIC AREA	DISPUTES BETWEEN PARTIES	WITNESS PANEL	TESTIMONY SUMMARY	DIRECT TESTIMONY ESTIMATE	CROSS-EXAM ESTIMATE
			the benefits of the PSEGS do not outweigh the potential significant impacts.		

TABLE 2

Palen Solar Electric Generating System (09-AFC-7C)
Exhibit List

Exhibit No.	Transaction No.	Document Title	Topic(s)
1124	201713	Palen Solar Holdings, LLC's Alternatives Supplemental Testimony , dated February 10, 2014 and docketed on February 10, 2014.	Alternatives
1125	201704	Palen Solar Holdings, LLC's Overriding Considerations Supplemental Testimony , dated February 10, 2014 and docketed on February 10, 2014.	Overriding Considerations
1126	201700	Palen Solar Holdings, LLC's Proposed Revisions of Staff's Condition of Certification CUL-1 , dated February 10, 2014, and docketed on February 10, 2014.	Cultural Resources

1127	201735	Palen Solar Holdings, LLC's Response to Center for Biological Diversity's Data Request (2:7:14) , dated February 13, 2014, and docketed on February 13, 2014.	Biological Resources
1128	201809	Palen Solar Holdings, LLC's Proposed Revisions to Condition of Certification BIO-16b , dated February 28, 2014, and docketed on February 28, 2014.	Biological Resources
1129	201817	Palen Solar Holdings, LLC's Drawing Showing Potential Future Thermal Storage Equipment , dated November 20, 2012, and docketed March 3, 2014.	Overriding Considerations
1130	201838	Palen Solar Holdings, LLC's Review of Potential Bird Deterrent Strategies for Large Scale Solar Facilities , dated March 6, 2014, and docketed on March 7, 2014.	Biological Resources

1131	202002	Fall 2013 Avian Field Surveys for Palen Solar Electric Generating System , dated February 13, 2014, and docketed on April 10, 2014.	Biological Resources
1132	202000	Fall 2013 Nocturnal Migration Surveys for Palen Solar Electric Generating System , dated February 7, 2014, and docketed on April 10, 2014.	Biological Resources
1133	202481	Revised Ex. 1133 - Updated Avian Comparison Table , dated July 18, 2014, and docketed on July 18, 2014.	Biological Resources
1134	202482	Ex.1134 - Biological Resources Supplemental Opening Testimony of Wally P. Erickson and Dr. Ken Levenstein - Avian Impacts , dated June 23, 2014, and docketed on June 23, 2014.	Biological Resources

1135	202483	Ex.1135 - Biological Resources Supplemental Opening Testimony of Andrea Grenier - Avian Mortality Data , dated June 23, 2014, and docketed on June 23, 2014.	Biological Resources
1136	202484	Ex. 1136 – Bio Supplemental Opening Testimony of Matt Stucky, Chris Morris and Charlie Turlinski – Infeasibility of Curtailment , dated June 23, 2014, and docketed on June 23, 2014.	Biological Resources
1137	202485	Ex.1137 - Biological Resources Supplemental Opening Testimony of Gustavo Buhacoff – Heliostat Operations at ISEGS and PSEGS , dated June 23, 2014, and docketed on June 23, 2014.	Biological Resources
1138	202486	Ex.1138 - Table and Graph – GSEP Labor Hours versus Reported Avian Mortality , dated June 23, 2014, and docketed on June 23, 2014.	Biological Resources

1139	202487	Ex.1139 - Draft Bird and Bat Conservation Strategy , dated June 18, 2014, and docketed on June 23, 2014.	Biological Resources
1140	202488	Ex.1140 - DeTect Testimony on Deterrent Method , dated June 23, 2014, and docketed on June 23, 2014.	Biological Resources
1141	202489	Ex.1141 - Biological Resources Supplemental Opening Testimony of Elwood G. Norris – Description of HyperSound Technology , dated June 23, 2014, and docketed on June 23, 2014.	Biological Resources
1142	202490	Ex.1142 - ISEGS Filed Documents on Pilot Complaints , dated March 10, 2014, and docketed on June 23, 2014.	Visual Resources

1143	202491	Ex.1143 - Comparison of Operational Benefits - PSEGS (Tower) versus PV Alternative, dated June 23, 2014, and docketed on June 23, 2014.	Overriding Considerations
1144	202494	Ex.1144 - Comparison of Operational Benefits - PSEGS (Tower) versus PSPP (Trough), dated June 23, 2014, and docketed on June 23, 2014.	Overriding Considerations
1145	202495	Ex.1145 - CEC 2012 IEPR Update - Important Attributes for California's Energy Future, dated June 23, 2014, and docketed on June 23, 2014.	Overriding Considerations
1146	202502	Ex.1146 - Tower Technology Has Greater Potential in the Intermediate-Term Than Trough, dated June 23, 2014, and docketed on June 23, 2014.	Overriding Considerations

1147	202503	Ex.1147 - Why Not Build TES Now? , dated June 23, 2014, and docketed on June 23, 2014.	Overriding Considerations
1148	202509	Ex. 1148 – Demand for PSEGS with TES Likely to Increase Over Time , dated June 23, 2014, and docketed on June 23, 2014.	Overriding Considerations
1149	202512	Ex. 1149 - CAISO “Duck Curve” Illustrates Potential for PSEGS with Thermal Storage , dated March 31, 2013, and docketed on June 23, 2014.	Overriding Considerations
1150	202515	Ex. 1150 – Infeasibility of Trough and PV Alternatives , dated June 23, 2014 and docketed on June 23, 2014.	Alternatives

1151	202516	Ex. 1151 – Alternatives Supplemental Opening Testimony of David Schlosberg – PPA Deadlines , dated June 23, 2014, and docketed on June 23, 2014.	Alternatives
1152	202519	Ex.1152 - Project Description Supplemental Opening Testimony - Natural Gas Use	Project Description
1153	202520	Ex.1153 - USFWS Letter to Solar Industry on May 12, 2014 , dated May 12, 2014, and docketed on June 23, 2014	Biological Resources
1154	202522	Ex. 1154 - USFWS February 14, 2014 Memo , dated February 14, 2014, and docketed on June 23, 2014.	Biological Resources

1155	202524	Ex.1155 - Table Comparing Solar Project Capacity and Acreage , dated June 19, 2014, and docketed on June 23, 2014.	Biological Resources
1156	202525	Ex.1156 - Bird Mortality at Wind Energy Facilities in Southwestern U.S. , dated June 23, 2014, and docketed on June 23, 2014.	Biological Resources
1157	202506	Ex.1157 - Anthropogenic Sources of Avian Mortality , dated June 23, 2014, and docketed on June 23, 2014.	Biological Resources
1158	202527	Ex.1158 - Pre-construction Field Survey Efforts Conducted at the PSEGS Project , dated June 23, 2014, and docketed on June 23, 2014.	Biological Resources

1159	202529	Ex.1159 - Fall Diurnal Raptor Plot , dated June 23, 2014, and docketed on June 23, 2014.	Biological Resources
1160	202530	Ex.1160 - Flux Projections at PSEGS , dated June 23, 2014, and docketed on June 23, 2014.	Biological Resources
1161	202533	Ex. 1161 - Carcass Distribution Plot , dated June 23, 2014, and docketed on June 23, 2014.	Biological Resources
1162	202534	Ex.1162 - ISEGS Flux Carcass Density Plots , dated June 23, 2014, and docketed on June 23, 2014.	Biological Resources

1163	202536	Ex.1163 - April 12, 2011 Letter from ABC, National Audubon Society and Others Regarding Feral Cats , dated, April 12, 2011, and docketed on June 23, 2014.	Biological Resources
1164	202537	Ex. 1164 – January 28, 2014 Letter from American Bird Conservancy Regarding Feral Cats , dated January 28, 2014, and docketed June 23, 2014.	Biological Resources
1165	202504	Ex. 1165 – Estimated Bird Cat Predation Rates , dated June 23, 2014, and docketed on June 23, 2014.	Biological Resources
1166	202727	Ex. 1166 – Project Description Supplemental Rebuttal Testimony , dated July, 18, 2014, and docketed on July 18, 2014.	Project Description

1167	202726	Ex. 1167 – Revised Phasing Plan , dated July 17, 2014, and docketed on July 18, 2014.	Project Description
1168	202729	Ex. 1168 – Estimated Construction Personnel By Month Phase I , dated July 17, 2014, and docketed on July 18, 2014.	Project Description
1169	202730	Ex. 1169 – Proposed Modifications to Soil & Water-3 , dated July 18, 2014, and docketed on July 18, 2014.	Project Description
1170	202731	Ex. 1170 - Proposed Modifications to BIO-29 , dated July 18, 2014, and docketed on July 18, 2014.	Biological Resources

1171	202732	Ex. 1171 - Cultural Resources Supplemental Rebuttal Testimony , dated July 18, 2014, and docketed on July 18, 2014.	Cultural Resources
1172	202733	Ex. 1172 - Proposed Modifications to CUL-1 , dated July 18, 2014, and docketed on July 18, 2014.	Cultural Resources
1173	202736	Ex. 1173 - Biological Resources Supplemental Rebuttal Testimony – Avian Impacts and Mitigation , dated July 18, 2014, and docketed on July 18, 2014.	Biological Resources
1174	202753	Ex. 1174 - ISEGS Winter Quarterly Avian Report , dated June 23, 2014, and docketed on July 18, 2014.	Biological Resources

1175	202728	Ex. 1175 - ISEGS May TAC Meeting Minutes , dated May 20, 2014, and docketed on July 18, 2014.	Biological Resources
1176	202741	Ex. 1176 - Biological Resources Supplemental Rebuttal Testimony – Insects , dated July 18, 2014, and docketed on July 18, 2014.	Biological Resources
1177	202735	Ex. 1177 - Summary and Analysis of CBD Exhibit 3108 , dated July 18, 2014, and docketed on July 18, 2014.	Biological Resources
1178	202743	Ex.1178 - Biological Resources Supplemental Rebuttal Testimony – Curtailment Infeasibility, Performance Standards and Polarized Light , dated July 18, 2014, and docketed on July 18, 2014.	Biological Resources

1179	202750	Ex.1179 - Alternative Supplemental Rebuttal Testimony , dated July 18, 2014, and docketed on July 18, 2014.	Alternatives
1180	202739	Ex. 1180 - Traffic and Transportation Supplemental Rebuttal Testimony – Glint and Glare – Effectiveness of Conditions , dated July 18, 2014, and docketed on July 18, 2014.	Traffic & Transportation
1181	202744	Ex. 1181 - Overriding Considerations Supplemental Rebuttal Testimony – Thermal Energy Storage , dated July 18, 2014, and docketed on July 18, 2014.	Overriding Consideration
1182	202754	Ex.1182 - Letter from American Bird Conservancy Grant Sizemore to CEC dated July 10, 2014, Avian Mitigation Plan Clarification , dated July 10, 2014, and docketed on July 18, 2014.	Biological Resources

1183	202752	Ex. 1183 - Article April 23, 2104 DOE's Moniz Calls For "Urgency" In Climate Change Action , dated April 23, 2014, and docketed on July 18, 2014.	Overriding Considerations
1184	202749	Ex. 1184 - PBS News Hour Article – World Bank President: Climate Change is Urgent Today Problem , dated April 18, 2013, and docketed on July 18, 2014.	Overriding Considerations
1185	202748	Ex. 1185 - UN Climate Chief: IPCC Press Release , dated April 13, 2014, and docketed on July 18, 2014.	Overriding Considerations
1186	202747	Ex.1186 - Biological Resources Supplemental Rebuttal Testimony – DeTect , dated July 18, 2014, and docketed on July 18, 2014.	Biological Resources

1187	202746	Ex. 1187 - Traffic and Transportation Rebuttal Testimony – Glint and Glare – Pilot Opinion , dated July 18, 2014, and docketed on July 18, 2014.	Traffic and Transportation
1188	202745	Ex.1188 - HyperSound Technical White Paper , dated July 2014, and docketed on July 18, 2014.	Biological Resources
1189	202742	Ex.1189 - NREL Report 40 percent RPS , dated June 9, 2014, and docketed on July 18, 2014.	Overriding Considerations
1190	202740	Ex.1190 - NREL Report 33 Percent RPS , dated April 24, 2013, and docketed on July 18, 2014.	Overriding Considerations

1191	202734	Ex.1191 - Ivanpah SEGS Heliostat Positioning Plan Report , dated July 17, 2014, and docketed on July 18, 2014.	Traffic & Transportation
1192	202737	Ex.1192 - Governor Brown Climate Change Article , dated July 7, 2014, and docketed on July 18, 2014.	Overriding Considerations
1193	202738	Ex.1193 - White House Climate Change Fact Sheet , dated May 6, 2014, and docketed on July 18, 2014.	Overriding Considerations