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Comment Received From: Shaun Gonzales

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Shaun Gonzales comments on 9-AFC-07C

Additional submitted attachment is included below.

California Energy Commission Docket Unit
Docket number: 09-AFC-07C
1516 Ninth Street, MS-4
Sacramento, CA 95614

Re: Docket No. 09-AFC-07C: Palen Solar Electric Generating System

Dear Commissioners;

Testimony and information submitted by BrightSource Energy, California Energy Commission (CEC) staff, Center for Biological Diversity, and Basin & Range Watch suggest that the impacts of the Palen Solar Electric Generating System (PSEGS) may be greater than those cited in the Presiding Members Proposed Decision (PMPD) to deny PSEGS. Furthermore, the natural gas consumption of the PSEGS design also negates any benefit that would be gained from BrightSource Energy's hypothetical molten salt storage application for Unit 2. Given the significant impacts PSEGS would have on cultural, visual and biological resources, and the lack of fossil fuel-free energy storage capacity, the CEC should deny BrightSource Energy's proposal to build the hybrid solar/natural gas PSEGS project.

BrightSource Energy has one semi-operational utility-scale project in California – the Ivanpah Solar Electric Generating System (ISEGS) – and the history of ISEGS suggests BrightSource has a poor record of assessing its technology's operational effectiveness, and its impact on wildlife. This casts doubt on BrightSource Energy's claim that the PSEGS project would deliver the nameplate clean energy output, on BrightSource's claim that PSEGS would only need 728 million standard cubic feet (mmscf) of natural gas annually, and on BrightSource's claim that PSEGS' solar flux impact on avian wildlife is only lethal above 25 kilowatts per square meter.

- According to CEC staff submissions (TN 58716) and CAISO unit status reports, the ISEGS project is prone to unplanned outages and probably under-delivering. From January to March 2014, ISEGS produced less than 20% of its anticipated output, according to CEC staff information derived from CEC-1304. BrightSource has not submitted information that would explain these outages and why PSEGS should be expected to operate more efficiently.
- BrightSource testified to the CEC that ISEGS would only burn 328 mmscf of natural gas per year, according to the final staff assessment for ISEGS. BrightSource in 2013 petitioned to amend the certification to expand natural gas usage at ISEGS to 525 mmscf annually. BrightSource claims PSEGS would include modified technology (eliminating a reheat cycle) that gives the company more confidence regarding anticipated natural gas usage, but BrightSource does not explain how this confidence has been tested or evaluated.

- The Staff Assessment and Final Commission Decision for ISEGS underestimated the impact of solar flux on wildlife, and BrightSource continues to deny or downplay ISEGS' impacts on birds and insects, despite the lack of thorough research. Preliminary data from partial surveys and research at ISEGS suggests solar flux may be responsible for extensive mortality of flying wildlife. BrightSource contends that birds are only at risk in areas of the solar flux field experiencing over 25 kilowatts per square meter of intensity, but USFWS is unable to verify this.

PSEGS' two 750 foot tall towers will constitute some of the tallest structures in California, but would be built in an area of above-average ecological intactness with deep significance to the Native American tribes of the Colorado River region. Glint and glare from the semi-operational ISEGS project has proven to the CEC Staff and intervenors that the impacts on visual resources of such an experimental design and scale are difficult to assess. The project almost certainly will attract, injure and kill sensitive and migratory bird species. The solar power tower design likely has an extensive impact on flying insects based on anecdotal information from ISEGS surveys, although the extent of these impacts remains poorly understood.

PSEGS' estimated – but uncertain - clean energy contribution would not be worth these impacts on California's natural heritage and wildlife. Other solar thermal or photovoltaic solar projects can generate clean energy without burning natural gas, birds, or insects, and preserve our ability to explore and enjoy intact desert wildlands.

Sincerely,
Shaun Gonzales