

DOCKETED

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Project Title:	Palen Solar Power Project - Compliance
TN #:	205748
Document Title:	Public comment from Patrick Donnelly on Opposing Commencement of Construction
Description:	Comment opposing Petition to Extend Deadline for Palen Solar Power Project
Filer:	Patrick Donnelly
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Patrick Donnelly
PO Box 6, Shoshone, CA 92384
donnellypa@gmail.com | 760.428.8653

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California Energy Commission Dockets Unit, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512
via electronic submission

Re: Docket No. 09-AFC-7C, Petition to Extend the Deadline for Commencement of Construction for the Palen Solar Power Project

I'm writing to urge you to reject the petition from Palen SEGS I, LLC ("Project Owner"), a subsidiary of Abengoa, to extend the deadline for commencement of construction at the Palen Solar Power Project (PSPP). The Project Owner's petition is disingenuous, and seeks to obfuscate the tremendous uncertainty continuing to surround PSPP.

PSPP has changed hands numerous times, being swapped about between a "who's who" of solar developers over the past five years. As companies have entered and pulled out, the design has been changed and changed again to meet the organizational priorities of whichever shell the PSPP ball was currently hiding under. In the presently considered Petition, the Project Owner seeks to use this tumult both to reinforce the steadfast effort they have made toward commencing the project (in Basis #1) and to explain how factors outside of their control have prevented success (in Basis #2). The repeated swapping of the project from owner to owner cannot both be demonstrative of a good faith effort toward compliance and be a hindrance toward success. It is indicative that all of those involved with this project have suspected that it cannot possibly succeed as its proponents have claimed.

As to the argument presented in Basis #3, the erstwhile Environmental Impact Statement for PSPP was written so long ago as to be irrelevant. The market for utility-scale solar energy in California has changed drastically since 2010. Perhaps more importantly, the knowledge that both we the public and regulators have about the negative environmental and cultural consequences of these facilities has been enhanced greatly in the intervening five years. We now understand just how destructive these facilities are to endangered species, to connectivity, and to Native American culture. Impacts which were previously unevaluated in Solar EIS's are now more well-known and subject to greater scrutiny.

Given how radically this project has evolved from what was evaluated in the initial EIS, and given how much our knowledge of these facilities has grown in the past five years, it is incumbent upon the Commission to reject this petition and terminate the PSPP. If Abengoa is sufficiently committed to building a solar facility in such a wildly inappropriate place for a large industrial development, they should start over with a new CEC proceeding and a new EIS/EIR.

Thank you for your consideration,

A handwritten signature in black ink that reads "Patrick Donnelly". The signature is written in a cursive, flowing style.

Patrick Donnelly
Shoshone, CA