

DOCKETED

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STATE OF CALIFORNIA
**Energy Resources Conservation
and Development Commission**

In the Matter of:

APPLICATION FOR CERTIFICATION) DOCKET NO. 09-AFC-7C
FOR THE PALEN SOLAR POWER)
PROJECT)
_____)

**OPPOSITION TO PETITION FOR EXTENSION OF DEADLINE FOR
COMMENCEMENT OF CONSTRUCTION, INTERVENER BASIN AND RANGE WATCH**

August 19th, 2015

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The Palen solar project in its many forms has had so many changes in technology and footprint, that we ask the Commission to deny the extension for commencement of construction.

The Palen solar project has gone from CSP parabolic trough design to steam power tower, and now may need to integrate to thermal storage molten salt tanks, which might mean a different heat transfer fluid needs to be used.

The commission has determined that the deadline for construction should be 5 years after a decision is made. The Commission can extend an order if “good cause” is shown.

The applicant failed to show good cause. There has been little effort by the applicant to come up with a good construction plan and provide an adequate thermal storage plan. There is no evidence that their technology will deliver.

The applicant, Abengoa, along with former owners, BrightSource and Solar Millennium, have never completed their Bureau of Land Management permitting process for obtaining a Right of Way and Notice to Proceed. A BLM ROW was issued for Solar Millennium and was stalled because Solar Millennium went bankrupt. The project was later acquired by BrightSource and Abengoa and stalled later because the applicants could not come up with a feasible storage plan or adequate mitigation for bird kills or impacts to Native American cultural values.

Both the California Energy Commission and the Bureau of Land Management have confirmed that CEC staff as well as Abengoa have made trips to the Crescent Dunes Solar Project, a solar thermal power tower located 13 miles north of Tonopah, Nevada last winter. The reason for the trips as explained to us was to examine the molten salt, thermal storage design. It should be noted that the Bureau of Land Management’s Public Relations officer for Nevada has stated that the Crescent Dunes Project will not go on line until December of 2015. Their on line date has been bumped up to almost two years after their original target date. Are these technological issues?

During the hearings just over one year ago for the Palen Solar Project, both applicants had a very weak, incomplete thermal storage plan that they seemed to add at the 11th hour. Because of the falling prices of PV, the California Public Utilities Commission and California Energy Commission have urged solar thermal projects to integrate storage so that they can compete in the renewable energy mix providing generation during times when PV cannot generate.

The technology of large solar power towers is now being scrutinized. While the Crescent Dunes Project seems to be undergoing unexpected delays, there are some revealing reports out there now about how the Ivanpah Solar Electric Generating System is failing to deliver their promised capacity. In June, the Wall Street Journal printed the following article: “High-Tech Solar Projects Fail to Deliver” .. <http://www.wsj.com/articles/high-tech-solar-projects-fail-to-deliver-1434138485>

“Turns out, there is a lot more to go wrong with the new technology. Replacing broken equipment and learning better ways to operate the complex assortment of machinery has stalled Ivanpah’s ability to reach full potential, said Randy Hickok, a senior vice president at NRG. New solar-thermal technology isn’t as simple as traditional solar panel installations. Since older solar photovoltaic panels have been around for decades, they improve in efficiency and price every year, he said.”

And

“One big miscalculation was that the power plant requires far more steam to run smoothly and efficiently than originally thought, according to a document filed with the California Energy Commission. Instead of ramping up the plant each day before sunrise by burning one hour’s worth of natural gas to generate steam, Ivanpah needs more than four times that much help from fossil fuels to get the plant humming every morning. Another unexpected problem: not enough sun. Weather predictions for the area underestimated the amount of cloud cover that has blanketed Ivanpah since it went into service in 2013.”

And finally on Abengoa:

Ivanpah isn’t the only new solar-thermal project struggling to energize the grid. A large mirror-powered plant built in Arizona almost two years ago by [Abengoa](#) SA of Spain has also had its share of hiccups. Designed to deliver a million megawatt hours of power annually, the plant is putting out roughly half that, federal data show.

These are large changes and we ask that the petitioner be required to start a new application so that full environmental review can be undertaken to analyze these uncertain technological changes and these and new impacts to vital desert resources in the area, such as cultural concerns, avian mortality, Mojave fringe-toed lizard populations, sand transport, rare plants, air quality, Colorado River groundwater connections, visual impacts, glint and glare dangers to air and highway traffic, and potential hazardous heat transfer fluids that might need to be used.

An amendment would not analyze in sufficient detail to allow the public to understand the large changes to the project that the petitioner is proposing. A new application should be required.

We believe that time and resources of Energy Commission staff would be more efficiently spent with a new application, instead of this complex series of amendments on an out-dated application that has had so many changes. Therefore we ask that the CEC deny an extension of this old application.

Sincerely,

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