

**DOCKETED**

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<b>Project Title:</b>	Compliance - Application for Certification for LUZ Solar Electric Generating Systems Cogeneration Unit VIII
<b>TN #:</b>	234219
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*Comment Received From: Luz Solar Partners, VIII, Ltd.  
Submitted On: 8/3/2020  
Docket Number: 88-AFC-01C*

## **Comments on Staff Analysis for SEGS VIII Final Decommissioning Plan**

Project Owner Luz Solar Partners, VIII, Ltd., herein provides the attached letter requesting their revisions be incorporated into the California Energy Commission Staff Analysis for the Solar Energy Generating System (SEGS) VIII (88-AFC-01C) Final Decommissioning Plan that was docketed on July 23, 2020. Luz Solar Partners, VIII, Ltd., appreciates Staff's attention to and processing of the Final Decommissioning Plan and respectfully requests the above noted revisions be incorporated into Staff's Order approving the Decommissioning Plan at the August 12, 2020 Business Meeting.

*Additional submitted attachment is included below.*

# LUZ Solar Project SEGS VIII

August 3, 2020

John Heiser  
California Energy Commission  
Siting, Transmission & Environmental Protection Division 1516 Ninth Street, MS 15  
Sacramento, CA 95814

Re: Solar Energy Generating System (SEGS) VIII (88-AFC-01C) Final Decommissioning Plan – Comments on Staff Analysis

Dear Mr. Heiser:

Project Owner Luz Solar Partners, VIII, Ltd., herein provides this letter requesting their revisions be incorporated into the California Energy Commission Staff Analysis for the Solar Energy Generating System (SEGS) VIII (88-AFC-01C) Final Decommissioning Plan that was docketed on July 23, 2020. Requested revisions include the following:

- Noise Section, Page 61 of the Staff Analysis:** The Staff Analysis incorrectly states that the listed three applicable Conditions of Certification (COCs) in the CEC Commission Decision are applicable to decommissioning and demolition. The three conditions listed in this subsection are actually the additional COCs proposed by Luz Solar Partners, VIII, Ltd. (the Petitioner) in the Final Decommissioning Plan. None of the existing COCs in the Decision would apply to decommissioning and demolition. We respectfully request to please make the correction to move the three conditions listed in the *Applicable Conditions of Certification in Decision* subsection of the Staff Analysis to the *Additional Proposed Conditions of Certification* subsection. Also, please state that “None of the existing Noise COCs would apply during decommissioning” in the *Applicable Conditions of Certification in Decision* subsection.
- Transportation Section, Page 84 of the Staff Analysis:** We respectfully request the removal of existing Transportation COC #7, related to monitoring and reporting of traffic accidents, from the list of COCs in the *Applicable Conditions of Certification in Decision*. This COC was applicable to the original construction of the SEGS VIII project (completed in 1989) and is not applicable to decommissioning or demolition activities. The requirements listed in this COC were not listed in the Conditions of Approval from the County of San Bernardino Conditional Use Permit (CUP) (approved on October 3, 2019) for the decommissioning and demolition of the existing SEGS VIII and IX solar thermal facilities and redevelopment at the same location, of a new PV solar facility and BESS. Appendix B of the Final Decommissioning Plan contains the County of San Bernardino’s Planning Commission Final Staff Report with the adopted findings, approval of the CUP based on the recommended findings and Conditions of Approval, and Notice of Exemption (posted January 8, 2020).

- 3. Waste Management, Page 101 of the Staff Analysis:** We respectfully request the removal of existing Waste Management COC #8, related to Heat Transfer Fluid (HTF) shipments to SEGS VIII, from the list of COCs in the *Applicable Conditions of Certification in Decision*. HTF will not be shipped to the SEGS VIII site during decommissioning. HTF will only be shipped off site during decommissioning and will be managed for proper containerization, profiling, and shipment off site for disposal or recycling. Existing COCs Waste Management #1 and #6, as noted in the Staff Analysis, would apply to decommissioning and demolition activities for the proper handling of hazardous waste, including HTF. Therefore, COC #8 is not necessary.

Luz Solar Partners, Ltd., VIII appreciates Staff's attention to and processing of the Final Decommissioning Plan and respectfully requests the above noted revisions be incorporated into Staff's Order approving the Decommissioning Plan at the August 12, 2020 Business Meeting.

Respectfully submitted,



Simon Day  
VP and Head of Solar Development