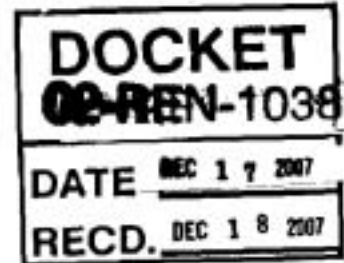


December 17, 2007

Commissioner John L. Geesman  
Commissioner Jackalyne Pfannenstiel, Chair  
Renewables Committee  
California Energy Commission  
Docket Unit, MS-4  
1516 Ninth Street  
Sacramento, CA 95814-5504

RE: Docket 02-REN-1038



**Comments of Luz Solar Partners, Ltd. III-IX on  
Guideline Revisions for the Existing Renewable Facilities Program**

These Comments are submitted on behalf of Luz Solar Partners, Ltd. III-IX ("Solar Partners" collectively) addressing the issues raised in the *Notice of Committee Workshop on Guideline Revisions for the Existing Renewable Facilities Program*. Solar Partners owns and operates 310 MWs, the largest amount of concentrated solar thermal generation in the world today. Solar Partners has relied on funding from the California Energy Commission's ("Commission") Existing Renewable Facilities Program ("Existing Account") to support the continued operation of those facilities and to provide a platform for investment to continue the delivery of the maximum electricity from the solar field. Consequently, the funds in the Existing Account have proven essential for the continued operation, with associated maintenance and investment, to maintain the highest output.

In the Guidebook revisions, as part of its review of funding applications, the Commission should support the investments of existing facilities that enhance operations and upgrade equipment to produce the maximum renewable output to support California in reaching its Renewable Portfolio Standard and Climate Change program goals. Solar Partners endorses the comments of the California Biomass Energy Alliance and, in particular, recommend amending the last sentence in Question 11 to include *maintains* generation as a result of using Existing Account funds. Doing so underscores the value of keeping current renewable generation in California's supply mix as well as the addition of new facilities.

Thank you for consideration of these comments.

Sincerely,

Luz Partners, Ltd. III-IX

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