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October 10, 2008

SACRAMENTO OFFICE

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CALIFORNIA ENERGY COMMISSION DOCKET UNIT Attn: Docket No. 07-AFC-05 1516 Ninth Street, MS-4 Sacramento, CA 95814-5512

Re: Ivanpah Solar Electric Generating System; Docket No. 07-AFC-05

Dear Docket Clerk:

Enclosed are an original and 2 copies of California Unions for Reliable Energy Response to Applicant's Proposed Schedule and Request for Revised Scheduling Order. Please process and return a conformed copy in the envelope provided. The document has previously been sent to the docket office via email.

Thank you for your assistance.

Sincerely,

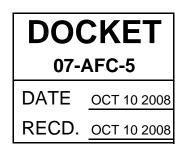
Laya a. Gulerice

Tanya A. Gulesserian

TAG:bh Enclosures

STATE OF CALIFORNIA

Energy Resources Conservation and Development Commission



In the Matter of:

The Application for Certification for the IVANPAH SOLAR ELECTRIC GENERATING SYSTEM Docket No. 07-AFC-05

CALIFORNIA UNIONS FOR RELIABLE ENERGY RESPONSE TO APPLICANT'S PROPOSED SCHEDULE AND REQUEST FOR REVISED SCHEDULING ORDER

October 10, 2008

Tanya A. Gulesserian Marc D. Joseph Adams Broadwell Joseph & Cardozo 601 Gateway Boulevard, Suite 1000 South San Francisco, CA 94080 (650) 589-1660 Voice (650) 589-5062 Facsimile tgulesserian@adamsbroadwell.com

Attorneys for the CALIFORNIA UNIONS FOR RELIABLE ENERGY

California Unions for Reliable Energy ("CURE") submits this response to the Applicant's proposed schedule and request for a revised scheduling order in this proceeding.

In an effort to meet both the intent of the Memorandum of Understanding ("MOU") between the Bureau of Land Management and the California Energy Commission and the desire of the Applicant to take steps to advance the schedule in this proceeding, CURE proposes that Commission staff release a working draft of the Preliminary Staff Assessment ("PSA") in early November. Since the Energy Commission's rules and regulations permit any number of workshops, a working draft PSA workshop could be held in early December. This compromise would enable the parties to more thoroughly evaluate the issues before the Joint PSA/Draft Environmental Impact Statement ("EIS") is released without violating the terms of the MOU.

Dated: October 10, 2008

Respectfully submitted,

/s/

Tanya A. Gulesserian Marc D. Joseph Adams Broadwell Joseph & Cardozo 601 Gateway Boulevard, Suite 1000 South San Francisco, CA 94080 (650) 589-1660 Voice (650) 589-5062 Facsimile tgulesserian@adamsbroadwell.com

Attorneys for the CALIFORNIA UNIONS FOR RELIABLE ENERGY

STATE OF CALIFORNIA

Energy Resources Conservation and Development Commission

In the Matter of:

The Application for Certification for the IVANPAH SOLAR ELECTRIC GENERATING SYSTEM Docket No. 07-AFC-05

PROOF OF SERVICE

I, Bonnie Heeley, declare that on October 10, 2008, I emailed copies of the attached CALIFORNIA UNIONS FOR RELIABLE ENERGY RESPONSE TO APPLICANT'S PROPOESD SCHEDULE AND REQUEST FOR REVISED SCHEDULING ORDER to the following. Transmission via electronic mail was consistent with the requirements of California Code of Regulations, title 20, sections 1209, 1209.5 and 1210.

Via email to: docket@energy.state.ca.us Atorre@BrightSourceEnergy.com sdevoung@brightsourceenergy.com jcarrier@ch2m.com idh@eslawfirm.com e-recipient@caiso.com tom hurshman@blm.gov Sterling_White@blm.gov dfgpalm@adelphia.net tgulesserian@adamsbroadwell.com Jbryon@energy.state.ca.us jboyd@energy.state.ca.us pkramer@energy.state.ca.us cmcfarli@energy.state.ca.us dratliff@energy.state.ca.us pao@energy.state.ca.us

I declare under penalty of perjury that the foregoing is true and correct. Executed at South San Francisco, CA on October 10, 2008

> ____/s/___ Bonnie Heeley