

Memorandum

Date: November 17, 2008

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File: 08-AFC-5

To: Karen Douglas, Presiding Member
Arthur H. Rosenfeld, Associate Member

From: California Energy Commission - Christopher Meyer
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Subject: **STIRLING ENERGY SYSTEMS SOLAR TWO PROJECT (08-AFC-5)
ISSUES IDENTIFICATION REPORT**

DOCKET**08-AFC-5**

DATE NOV 17 2008

RECD. NOV 18 2008

Attached is the U.S. Bureau of Land Management (BLM) and California Energy Commission staff's Issues Identification Report for the Stirling Energy Systems Solar Two (SES Solar Two) Project (08-AFC-5). This report serves as a preliminary scoping document that identifies any potential issues that U.S. Bureau of Land Management and California Energy Commission staff believe will require careful attention and consideration. Energy Commission staff will present the issues report at the Informational Hearing and Site Visit to be held on November 24, 2008.

The SES Solar Two Project is being reviewed under a joint state and federal process by the BLM and Energy Commission. Although the project qualifies for and will be conducted according to the Energy Commission's 12-month process, the joint agency review will require additional steps and time in order to integrate the federal review process under the National Environmental Policy Act (NEPA) with the Energy Commission's process according to the California Environmental Quality Act (CEQA). A discussion on the joint agency process and scheduling issues is provided in the body of this document. Meeting the proposed schedule will require resolving issues expeditiously and working closely and efficiently with the BLM as co-lead agency. The agencies intend to develop a joint document that will ensure that the Final Staff Assessment (FSA)/Final Environmental Impact Statement (FEIS) fully addresses the issues and responsibilities of both agencies.

cc: Docket (08-AFC-5)
Proof of Service List

Attachment

**STIRLING ENERGY SYSTEMS
SOLAR TWO PROJECT
(08-AFC-5)**

November 17, 2008

ISSUES IDENTIFICATION REPORT

CALIFORNIA ENERGY COMMISSION

Siting, Transmission and Environmental Protection Division

ISSUES IDENTIFICATION REPORT STIRLING ENERGY SYSTEMS SOLAR TWO PROJECT

(08-AFC-5)

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ISSUES IDENTIFICATION REPORT

The purpose of this U.S. Bureau of Land Management (BLM) and California Energy Commission staff report is to inform the Committee and all interested parties of any potential issues that have been identified in the case thus far. Issues are identified as a result of our discussions with federal, state, and local agencies, and our review of the Stirling Energy Systems Solar Two (SES Solar Two) Project Application for Certification (AFC), Docket Number 08-AFC-5. The Issues Identification Report contains a project description, summary of any potentially significant environmental and engineering issues, and a discussion of the proposed project schedule. The staff will address the identification of any issues and progress towards their resolution in periodic status reports to the Committee.

PROJECT LOCATION

The SES Solar Two Project site is located primarily on federal land managed by the BLM. The project site is approximately 100 miles east of San Diego, 14 miles west of El Centro, and 4 miles east of Ocotillo. The following sections or portions of sections in Township 16 of the San Bernardino Meridian identify the project site and the planned boundary for development of the SES Solar Two Project.

Within Township 16 South, Range 11 East of the San Bernardino Meridian defined by:

- the portion of Section 7 south of the railroad right-of-way (ROW),
- the portion of the southwest quarter section and the north half of the southeast quarter section of Section 9 south of the railroad ROW,
- the southeast quarter-quarter section of the northeast quarter section and the east half of the southeast quarter section of Section 14 north of the I-8 ROW and east of Dunaway Road,
- the southwest, northwest, and southeast quarter-quarter sections of the southwest quarter section of Section 15, and the southwest quarter-quarter of the southeast quarter section of Section 15,
- the northwest quarter and southeast quarter of Section 16,
- all of Section 17,
- Section 18, excluding the southwest and southeast quarter-quarter sections of the northeast quarter section,
- the northwest quarter and the portion of the west half of the southwest quarter of Section 19 north of the I-8 ROW,
- the portion of Sections 20 and 21 north of the I-8 ROW, and
- the portion of the north half of the northwest quarter section and the northwest quarter-quarter section of the northeast quarter section of Section 22 north of the I-8 ROW.

Township 16 South, Range 10 East defined by:

- the portions of Sections 12, 13, and 14 south of the railroad ROW,
- the portions of Section 22 south of the railroad ROW,
- all of Sections 23 and 24, and
- the portions of Sections 25, 26, and 27 north of the I-8 ROW.

The proposed SES Solar Two Project also includes an electrical transmission line, water supply pipeline, and a site access road. The off-site 6-inch-diameter water supply pipeline would be constructed a distance of approximately 3.40 miles from the Imperial Irrigation District (IID) Westside Main Canal to the project boundary. The water supply pipeline would be routed in the Union Pacific Railroad ROW, or adjacent to this ROW on federal and private lands. Approximately 7.56 miles of the 10.3-mile double-circuit generation interconnection transmission line would be constructed off-site. The transmission line would connect the proposed SES Solar Two substation to the existing San Diego Gas & Electric (SDG&E) Imperial Valley Substation. A site access road would be constructed from Dunaway Road to the eastern boundary of the project site, generally following an existing BLM road.

PROJECT DESCRIPTION

The proposed SES Solar Two project would be a nominal 750-megawatt (MW) Solar Stirling Engine project, with construction planned to begin in either late 2009 or early 2010. Although construction would take approximately 40 months to complete, power would be available to the grid as each 60-unit group of Stirling Engine modules is completed. The primary equipment for the generating facility would include approximately 30,000, 25-kilowatt solar dish Stirling systems (referred to as SunCatchers), their associated equipment and systems, and their support infrastructure. Each SunCatcher consists of a solar receiver heat exchanger and a closed-cycle, high-efficiency Solar Stirling Engine specifically designed to convert solar power to rotary power then driving an electrical generator to produce electricity. The 6,500-acre project site is located on approximately 6,140 acres of federal land managed by the Bureau of Land Management (BLM) and approximately 360 acres of privately owned land.

The project will be constructed in two phases. Phase I of the project will consist of up to 12,000 SunCatchers configured in 200 1.5-MW solar groups of 60 SunCatchers per group and have a net nominal generating capacity of 300 MW. Phase II will add approximately 18,000 SunCatchers, expanding the project to a total of approximately 30,000 SunCatchers configured in 500-1.5-MW solar groups with a total net generating capacity of 750 MW.

The Applicant has applied for a ROW grant for the project site from the Bureau of Land Management (BLM) California Desert District. Although the project is phased, it is being analyzed in this Application for Certification as if all phases will be operational at the same time.

Within the project boundary, the SunCatchers in Phase I require approximately 2,600 acres and those in Phase II require approximately 3,500 acres. The total area required for both phases, including the area for the operation and administration building, the maintenance building, and the substation building, is approximately 6,500 acres. The

230-kV transmission line required for Phase I would parallel SDG&E's existing Southwest Powerlink transmission line within the designated ROW. A water supply pipeline for the project would be built on the approved Union Pacific Railroad ROW.

PROCESS DESCRIPTION

The SunCatcher is a 25-kilowatt-electrical (kWe) solar dish Stirling system designed to automatically track the sun and collect and focus solar energy onto a power conversion unit (PCU), which generates electricity. The system consists of a 38-foot-high by 40-foot-wide solar concentrator in a dish structure that supports an array of curved glass mirror facets. These mirrors collect and concentrate solar energy onto the solar receiver of the PCU.

The PCU converts the focused solar thermal energy into grid-quality electricity. The conversion process in the PCU involves a closed-cycle, four-cylinder, 35-horsepower reciprocating Solar Stirling Engine utilizing an internal working fluid of hydrogen gas that is recycled through the engine. The Solar Stirling Engine operates with heat input from the sun that is focused by the SunCatcher's dish assembly mirrors onto the PCU's solar receiver tubes, which contain hydrogen gas. The PCU solar receiver is an external heat exchanger that absorbs the incoming solar thermal energy. This heats and pressurizes the hydrogen gas in the heat exchanger tubing, and this gas in turn powers the Solar Stirling Engine.

A generator is connected to the Solar Stirling Engine; this generator produces the electrical output of the SunCatcher. Each generator is capable of producing 25 kWe at 575 volts alternating current (VAC)/60 hertz (Hz) of grid-quality electricity when operating with rated solar input. Waste heat from the engine is transferred to the ambient air via a radiator system similar to those used in automobiles.

The hydrogen gas is cooled by a standard glycol-water radiator system and is continually recycled within the engine during the power cycle. The conversion process does not consume water. The only water consumed by the SunCatcher is for washing of the mirrors to remove accumulated dust and replenishing small losses to the cooling system radiator in a 50-50 glycol-water coolant.

TRANSMISSION

The project would include the construction of a new 230-kV substation approximately in the center of the project site. This new substation would be connected to the existing SDG&E Imperial Valley Substation via an approximately 10.3-mile, double-circuit, 230-kV transmission line. Other than this interconnection transmission line, no new transmission lines or off-site substations would be required for the 300-MW Phase I construction. The full Phase II expansion of the project, and delivery of the additional renewable power to the San Diego regional load center, would require the construction of the 500-kV Sunrise Powerlink transmission line project proposed by SDG&E.

WATER USE AND DISCHARGE

When completed, the Solar Two Project would require a total of approximately 32.7 acre-feet of raw water per year. SunCatcher mirror washing and operations dust control under regular maintenance routines would require an average of approximately 23.3 gallons of raw water per minute, with a daily maximum requirement of approximately

39.2 gallons of raw water per minute during the summer peak months each year, when each SunCatcher receives a single mechanical wash.

Water for Solar Two Project SunCatcher mirror washing, fire water, and domestic use would be provided by the Imperial Irrigation District (IID) via the existing Westside Main Canal. SunCatcher mirror washing requires the water to be demineralized to prevent mineral deposits forming on the SunCatcher mirrors. Processes available for demineralization are reverse osmosis (RO) and ion exchange, with RO being the preferred process. The appropriate technological process will be determined during the environmental review process.

The water treatment wastewater generated by the RO unit contains relatively high concentrations of total dissolved solids (TSD). Wastewater or brine generated by the RO unit would be discharged to a concrete-lined evaporation pond, or equivalent. After the brine has gone through the evaporation process, the solids that settle at the bottom of the evaporation pond would be tested by the applicant and disposed of in an appropriate non hazardous waste disposal facility.

ENERGY COMMISSION AND BUREAU OF LAND MANAGEMENT JOINT REVIEW PROCESS

The BLM and Energy Commission have executed a Memorandum of Understanding for conducting a joint environmental review of thermal generating projects such as the SES Solar Two Project proposed on BLM managed federal lands. The joint document will be a single document that addresses both the National Environmental Policy Act (NEPA) and California Environmental Quality Act (CEQA) review procedures. The state and federal agencies coordination for the development of a joint environmental analysis of the proposed project avoids duplication of staff efforts, shares staff expertise and information, promotes intergovernmental coordination at the local, state, and federal levels, and facilitates public review by providing a joint document in an efficient environmental review process.

Under federal law, the BLM is responsible for processing requests for rights-of-way to authorize the proposed project and associated transmission lines and other facilities to be constructed and operated on land it manages. In processing applications, the BLM must comply with the requirements of NEPA, which requires that federal agencies reviewing projects under their jurisdiction consider the environmental impacts associated with the proposed project's construction and operation.

As the lead agency under CEQA, the Energy Commission is responsible for reviewing and ultimately approving or denying all applications to construct and operate thermal electric power plants, 50 MW and greater, in California. The Energy Commission's facility certification process carefully examines public health and safety, environmental impacts and engineering aspects of proposed power plants and all related facilities such as electric transmission lines and natural gas and water pipelines.

The first step in the Energy Commission's process was for the Commission to determine whether or not the AFC contained all the information required to meet its data adequacy regulations, at which point the staff analysis process can proceed. On October 10, 2008, the Energy Commission determined that the AFC was complete, thus beginning the joint agency staff's data discovery and issue analysis phases of the review process.

POTENTIAL MAJOR ISSUES

This portion of the report contains a discussion of the potential issues the Energy Commission and BLM staffs have identified to date. This report may not include all the significant issues that may arise during the case, as discovery is not yet complete, and other parties have not had an opportunity to identify their concerns. The identification of the potential issues contained in this report was based on our judgement of whether any of the following circumstances will occur:

- Significant impacts may result from the project which may be difficult to mitigate;
- The project as proposed may not comply with applicable laws, ordinances, regulations or standards (LORS);
- Conflicts may arise between the parties about the appropriate findings or conditions of certification for the Commission decision that could result in a delay to the schedule.

BUREAU OF LAND MANAGEMENT SCHEDULING ISSUES

There are several potential scheduling issues that must be resolved in order for the SES Solar Two Project to meet the proposed licensing process schedule. The BLM has notified the Energy Commission that the requirements and mandates established under NEPA for completing an Environmental Impact Statement (EIS) for the project may result in a longer time period to process than one year. Several components of the BLM NEPA process are not within the direct control of the agency. For example, BLM is required to publish Notices of Availability for the Draft Environmental Impact Statement (DEIS) and FEIS in the Federal Register (FR). Departmental policy requires all FR Notices to be reviewed and approved by the Assistant Secretary for Lands and Minerals (ASLM). BLM does not control the timing of reviews outside the agency. BLM also is required to have a 90-day comment period on a DEIS after which all comments must be addressed in the FEIS and Decision. The time necessary to respond to comments and incorporate responses into a FEIS is a function of the number and complexity of comments. Because of the extent of the area affected by the project, BLM anticipates a high level of interest in the project. Although the BLM has consulted with the US Fish & Wildlife Service (USFWS) and it has been determined that no threatened or endangered species are on the project site and a Biological Opinion (BO) will not be necessary, BLM may not be able to complete its portions of a Preliminary Staff Assessment (PSA)/DEIS and FSA/FEIS within estimated time frames due to the other requirements identified above.

As a result of the BLM noticing requirements, the Energy Commission and BLM staffs have developed a schedule that meets the minimum BLM noticing requirements and is as close to the Energy Commission's standard 12-month schedule as reasonably possible. It should be noted that BLM has significant concerns regarding their ability to thoroughly address NEPA requirements in a compressed schedule. We share their concerns and believe that additional time may be required to address and resolve all issues and ensure adequate participation by all parties from the perspective of both the BLM and Energy Commission staff. However, notwithstanding these reservations, the

staffs of both agencies recommend adoption of this schedule, recognizing the challenges presented by this review period. We will provide the required periodic status reports to report any future delays in the proceeding.

SUMMARY OF ISSUES AND DATA REQUESTS

The following table lists all the subject areas evaluated and notes those areas where critical or significant issues have been identified in this Issues Identification Report and if data requests have been prepared. Even though an area is identified as having no significant issues, it does not mean that an issue will not arise related to the subject area. For example, disagreements regarding the appropriate conditions of certification may arise between staff and applicant that will require discussion at workshops or even subsequent hearings. Staff currently believes such issues are likely to have an impact on the schedule.

Issues Report	Data Req.	Technical Subject Area	Issues Report	Data Req.	Technical Subject Area
No	No	Alternatives	No	No	Socioeconomics
No	Yes	Air Quality	No	Yes	Soils and Water
No	Yes	Biological Resources	No	Yes	Traffic & Transportation
Yes	Yes	Cultural Resources	No	No	Transmission Safety
No	No	Geo/Paleo Resources	No	No	Transmission Sys. Eng.
No	No	Hazardous Material	Yes	Yes	Visual Resources
Yes	Yes	Land Use	No	Yes	Waste Management
No	No	Noise	No	No	Worker Safety & Fire Protection

ISSUES DISCUSSION

CULTURAL RESOURCES

Due to the undisturbed nature of the area, the extremely high frequency of identified cultural resources on or adjacent to the proposed project site, and the potential for unidentified cultural resource sites, the BLM and Energy Commission staff are engaged in developing resolutions to the impacts that the proposed SES Solar Two Project would have on cultural resources. It is the intent of the BLM and Energy Commission to gather the additional information necessary to construct an adequate picture of the cultural environment of the project area, and to enable the BLM and the Energy Commission to formulate substantive resolutions to the issues identified.

Staff is still analyzing the potential impacts of the installation of 30,000 SunCatchers and associated facilities over the 6,500-acre project site, with 254 known archaeological sites, and is endeavoring to draw conclusions on how the impacts would be mitigated. Although the nature of the installation of the SunCatcher technology allows for reduced ground disturbance and flexibility in the location of the individual units, the construction of the project would, nonetheless, lead to the whole and partial destruction of a number of cultural resources.

The BLM and Energy Commission staff will continue to work together, and with local Native American communities, to fully address the potential impacts to cultural resources on the proposed SES Solar Two Project in an expeditious manner. Nonetheless, the sheer volume of information involved in a project that spans 10 square miles will require additional time for analysis.

LAND USE

The BLM and Energy Commission staff are concerned about the allocation of federal lands and the development of private lands for the proposed SES Solar Two Project. It is the intent of the BLM and Energy Commission to find resolution to the issues identified.

Approximately 6,075 acres of the Solar Two Project site would be developed with 30,000 SunCatchers and associated ancillary facilities and linears, which would result in approximately 2,747 acres of total permanent surface disturbance. Construction would result in temporary surface disturbance of approximately 3,000 acres (AFC page 5.9-7).

The BLM-administered public portions of the Project site are composed primarily of 6,140 acres of undeveloped desert that are managed under the U.S. BLM's California Desert Conservation Area Plan. Land within the 360-acre portion of the Project site that are under Imperial County jurisdiction are designated as S-2 (Recreation/Open Space).

The following issues need to be addressed in the Land Use section of the joint Staff Assessment /Environmental Impact Statement:

- The land use impacts of the Solar Two Project arise primarily from the conversion of 6,140 acres in the Government Special Public zone of the Ocotillo/Nomirage Planning Area from BLM-administered public land Open Space land use, to solar energy capture and energy conversion apparatus, attendant outbuildings, supporting structures, roadways, and parking lots.
- The Project will affect both private lands within the jurisdiction of Imperial County, and BLM-administered public lands under the jurisdiction of the BLM.
- The Project would permanently change the nature of land use at the Project site from Government Special Public Limited Use interspersed with private parcels that are zoned for Open Space, to an intensive utility for the generation of power (AFC page 5.9-12).
- Other proposals for land uses in the vicinity must be considered and analyzed from a cumulative impact basis.
- In addition, there would be a loss of recreational use at the Project site, which is moderately used for dispersed camping and associated off-highway vehicle (OHV) use.

VISUAL RESOURCES

The BLM and Energy Commission staff have expressed concerns with the potential visual impacts. These include impacts to recreational visitors in nearby recreational destinations. A visual analysis that conforms to BLM regulations, including development of Interim Visual Resource Management (VRM) classifications for the viewshed is being developed by the BLM and Energy Commission staffs. It is the intent of Energy

Commission staff to work closely with BLM staff to develop the Interim VRM mapping needed to evaluate the project under the BLM VRM methodology.

This process of developing interim VRM mapping together with BLM staff must be completed prior to preparation of the Preliminary Staff Assessment/Draft Environmental Impact Statement (PSA/DEIS) visual analysis and be consistent with both the Energy Commission and BLM visual assessment methodologies. It is our intent to develop conditions of certification to address both BLM and Energy Commission approval and monitoring procedures. The agency staffs are scheduled to meet on November 24, 2008, and have already begun this coordinated effort. Energy Commission staff will participate in any workshop where visual resources will be discussed and will work with BLM staff to incorporate the Visual Resource Management classification within staff's visual resource methodology.

Given the size and location of the project, staff is analyzing several issues related to visual resources. The project envisions the construction of 30,000 SunCatchers, the associated facilities, and linears on 6,140 acres on land administered by the BLM and an additional 360 acres of private property. These would be new intrusions on what is primarily undeveloped desert landscape and could affect the visual quality and character of the area.

SCHEDULING ISSUES

The schedule on page 12 requires additional days beyond the Energy Commission staff's standard review process schedule for key events. This schedule focuses on Energy Commission and Bureau of Land Management staff document publications and event noticing requirements. Meeting this ambitious schedule will require: resolving issues expeditiously, working closely and efficiently with the Bureau of Land Management as co-lead federal agency, and the applicant providing timely and comprehensive responses to staff's information requests.

BUREAU OF LAND MANAGEMENT INFORMATION

BLM noticing requirements and the associated dates are in Blue in the following proposed project schedule.

BLM Schedule Acronyms:

ASLM - Assistant Secretary for Lands and Minerals
BA - Biological Assessment
BLM - Bureau of Land Management
BO - Biological Opinion
EIS - Environmental Impact Statement
DEIS –Draft Environmental Impact Statement
FEIS - Final Environmental Impact Statement
FR - Federal Register
IBLA - United States Interior Board of Land Appeals
NOA - Notice of Availability
NOI - Notice of Intent
ROD - Record of Decision
USFWS - United States Fish and Wildlife Service
WO - BLM Washington Office

STAFF'S PROPOSED SCHEDULE – SES SOLAR TWO PROJECT

Activity	Date
Petition filed by project owner	Jun 30, 2008
Project Deemed Data Inadequate	Aug 13, 2008
Project Deemed Data Adequate	Oct 10, 2008
Energy Commission Committee assigned to oversee petition AFC process	Oct 10, 2008
BLM publishes NOI in FR (45-day scoping)	Oct 10, 2008
CEC/BLM staff files data requests	Nov 14, 2008
CEC/BLM staff files Issues Identification Report	Nov 17, 2008
Informational hearing and site visit/BLM scoping meeting	Nov 24, 2008
Applicant provides data responses	Dec 08, 2008
Data response and issue resolution workshop	Dec 18, 2008
CEC/BLM Staff files data requests (round 2, if necessary)	Jan 15, 2009
BLM NOA on PSA/DEIS to WO and ASLM (6-8 wks)	Jan 15, 2009
Applicant provides data responses (round 2, if necessary)	Feb 15, 2009
Local, state, and federal agency determinations	Feb 27, 2009
Data response and issue resolution workshop (round 2, if necessary)	Feb 27, 2009
PSA/DEIS filed (90-day comment period required)	Mar 05, 2009
PSA Workshop/DEIS public mtgs	Mar 26, 2009
Close BLM comment period	Jun 05, 2009
Local, state and federal agency final determination	Jul 21, 2009
NOA FEIS to WO and ASLM (6-8 wks)	Sep 01, 2009
Prepare responses to comments and add to FSA/FEIS	Jul 23, 2009
NOA of FSA/FEIS in FR	Oct 01, 2009
Final Staff Assessment/FEIS filed	Oct 01, 2009
Prehearing/Evidentiary hearings start	*TBD
Energy Commission Committee files proposed decision	*TBD
Hearing on the proposed decision	*TBD
BLM ROD (start 60-day federal review, 30-day protest, IBLA appeal)	*TBD
Close of public comments on the proposed decision	*TBD
Addendum/revised proposed decision	*TBD
Commission Decision	*TBD

*To Be Determined (TBD)



BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT
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1516 NINTH STREET, SACRAMENTO, CA 95814
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**APPLICATION FOR CERTIFICATION
For the SES SOLAR TWO PROJECT**

Docket No. 08-AFC-5

PROOF OF SERVICE

Revised 11/12/08

INSTRUCTIONS: All parties shall either (1) send an original signed document plus 12 copies or (2) mail one original signed copy AND e-mail the document to the address for the Docket as shown below, AND (3) all parties shall also send a printed or electronic copy of the document, which includes a proof of service declaration to each of the individuals on the proof of service list shown below:

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DECLARATION OF SERVICE

I, April Albright, declare that on November 18, 2008, I deposited copies of the attached Stirling Energy System Solar Two Project (08-AFC-5)- Issues Identifications Report, in the United States mail at Sacramento, CA with first-class postage thereon fully prepaid and addressed to those identified on the Proof of Service list above.

OR

Transmission via electronic mail was consistent with the requirements of California Code of Regulations, title 20, sections 1209, 1209.5, and 1210. All electronic copies were sent to all those identified on the Proof of Service list above.

I declare under penalty of perjury that the foregoing is true and correct.

Original Signature in Dockets
April Albright

Attachments