

## CALIFORNIA ENERGY COMMISSION

1516 NINTH STREET  
SACRAMENTO, CA 95814-5512  
www.energy.ca.gov

**DOCKET****09-AFC-7**DATE JUL 09 2010RECD JUL 12 2010

July 9, 2010

Solar Millennium, LLC  
Attention: Alice Harron  
1625 Shattuck Avenue, Suite 270  
Berkeley, CA 94709

Dear Ms. Harron:

Thank you for filing Solar Millennium's alternatives 2 and 3, which were docketed July 2, 2010. In response to your filing, Energy Commission staff have the following questions that they would like clarified so that the Energy Commission can complete its analysis of the Palen Solar Power Project.

In order to publish the Revised Staff Assessment by August 11, 2010, I would appreciate if you could docket this information by July 19, 2010.

Please feel free to call me directly at 916-653-8236 if you have any questions.

Sincerely,

Alan H. Solomon  
Project Manager

PROOF OF SERVICE (REVISED 7/2/10) FILED WITH  
ORIGINAL MAILED FROM SACRAMENTO ON 7/12/10

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## **Technical Area: Air Quality**

### **Background**

The project reconfiguration alternatives documentation noted that project impacts would not significantly increase but did not provide any specific technical documentation to confirm that assertion. In order to evaluate the air quality impacts from operation of the project alternatives staff needs additional information regarding site control or additional modeling analyses to assess the worst-case impacts for these project alternatives.

### **Information Requests**

1. Please provide a discussion and comparison of the minimum distance to controlled fence line from the stationary sources and the other site property controls that would be used to demonstrate why the offsite pollutant impacts from project operation, which were determined for the original proposed project configuration, would not increase for the two project alternatives.
2. Please provide revised UTM coordinates for the revised locations for the controlled site boundary and stationary sources for each of the two alternatives.
3. Please identify whether SCAQMD is or is not requiring a revised air quality impact analysis, whether performed by the applicant or by SCAQMD, for the reconfigured project alternatives.
4. Please provide a revised modeling analysis for short-term NO<sub>2</sub> (1-hour), and PM<sub>10</sub> and PM<sub>2.5</sub> (24-hour) impacts for each of the two alternatives: 1) where the site property controls will not maintain a controlled fence line distance from the project's stationary sources that is in all directions as great or greater than that of the modeled proposed project layout; and 2) if SCAQMD is requiring a revised air quality impact analysis for these project alternatives.

## **Technical Area: Biological Resources**

### **Information Request**

For Reconfigured Alternatives 2 and 3 please provide the following:

1. An analysis of impacts to the sand transport corridor and Mojave fringe-toed lizard habitat, including direct and indirect impact acreages (by Zone and also overall MFTL habitat). If sand management activities such as clearing accumulated sand from the base of the wind fencing are proposed (please provide as much detail as possible on those proposed activities, including information about the anticipated frequency and volume of sand removal, the kind of equipment that would be used to excavate and transport the sand, measures that would be taken to protect surrounding habitat and wildlife, and a figure depicting the location proposed for depositing the sand.
2. Number of acres within DT Critical Habitat
3. The following files, in both GIS (shapefile) and Google earth (kml) formats for:
  - a. Project disturbance area boundary

- b. Wind fence (if different from disturbance boundary)
- c. 2009 and 2010 MFTL observations points (from applicant's Figure 19)
- d. For Alternatives 2 and 3, please provide calculations for indirect impacts to the sand transport corridor/MFTL habitat

For the Proposed Project (and Reconfigured Alternatives 2 & 3 where applicable):

1. The updated Biological Resources Technical Report (mentioned in the Spring 2010 survey results memo dated June 15, 2010, on the first page of the AECOM memo dated May 27, 2010). This report should contain:
  - a. Temporary and permanent impact acreages by habitat type (or species if appropriate) broken down by power plant footprint, transmission line, etc. Please use the same table response format that was submitted for the June 23, 2010 Blythe filing.
  - b. Please include updated buffer and Biological Resources Survey Area numbers, if applicable
2. If phasing is proposed for Palen as for Blythe, we would need detailed phasing information including a figure depicting the boundaries of each phase and acreages disturbed for each phase. For each phase area please also include the acreage of habitat types (for example, desert wash woodland and other waters of the state, Mojave fringe-toed lizard habitat, stabilized and partially stabilized sand dunes, critical habitat, etc.).

## **Technical Area: Hazardous Materials Management**

### **Background**

The Supplementary Information on Alternatives 2 and 3 (docketed July 2, 2010) states that for Field 1 (the eastern solar field) "the entire power block has been shifted south by approximately 2700 feet" but that no changes to the equipment layout have been made. This means that the propane tank has been moved 2700 feet nearer to Interstate-10 (I-10). Furthermore, the southern solar arrays of Field 1 have been moved closer to the I-10 right-of-way (ROW). Staff needs additional information to ensure that blast effects from an explosion of the propane tank, thermal radiation effects from a propane fire, and thermal radiation effects from a HTF fire will not impact the public traveling on I-10. When conducting the thermal impacts modeling, the applicant must use the level of 1.5 KW/m<sup>2</sup> (450 Btu/hr-ft<sup>2</sup>) as the acceptable level of thermal radiation flux for human exposure.

### **Information Requests**

1. Please provide a remodeling of blast impacts on off-site receptors, and in particular traffic on I-10, from the new location of the Field 1 propane tank.
2. Please provide a modeling of thermal radiation effects on off-site receptors, and in particular traffic on I-10, from a fire at the new location of the Field 1 propane tank.

3. Please provide a modeling of thermal radiation effects on off-site receptors, and in particular traffic on I-10, from a fire at the new location of the Field 1 solar array closest to I-10.
4. Please state the shortest distance from the Field 1 propane tank to the I-10 ROW and the shortest distance from a solar array to the I-10 ROW.

### **Background**

The AFC and a Data Response indicate that the use of propane instead of tapping into an existing natural gas pipeline was an economic decision. Given the proximity of the reconfigured Field 1, staff needs to know if the use of natural gas instead of propane remains uneconomical.

### **Information Request**

5. Please provide a rationale for the use of propane instead of natural gas.

### **Technical Area: Soil and Water**

#### **Information Request**

Staff is concerned that water demands and the well locations have changed. Please verify the water demands and provide the locations of proposed wells and their proposed capacity if they have changed.

### **Technical Area: Worker Safety/Fire Protection**

#### **Background**

The Supplementary Information on Reconfigured Alternatives 2 and 3 (docketed July 2, 2010) provided maps for the different alternative reconfigurations but the maps do not clearly show the second emergency access road, the second access gate onto the site, and the roads around the inside and outside of the perimeter. Staff needs this information to ensure that adequate emergency response access will be provided.

#### **Information Request**

Please provide a new map for each of the two reconfigured site alternatives that clearly show the second emergency access road, the second access gate onto the site, the roads around the inside of the site from one field to the next, and the roads on the outside of the perimeter fence.

### **Technical Area: Transmission System Engineering**

#### **Background**

Staff understands that a redundant transmission telecommunication fiber optic line is required for interconnection. Staff also understands that the future Southern California Edison Red Bluff substation, where the Palen Solar Power Project will terminate, has been reconfigured.

## **Information Request**

1. For each Alternative 2 and 3, please describe the redundant fiber optic line facility and routing.
2. For each Alternative 2 and 3, please provide maps for each alternative that show the routing for the transmission tap line, the redundant fiber optic line and the termination location in the reconfigured Red Bluff substation.



BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT  
COMMISSION OF THE STATE OF CALIFORNIA  
1516 NINTH STREET, SACRAMENTO, CA 95814  
1-800-822-6228 – [WWW.ENERGY.CA.GOV](http://WWW.ENERGY.CA.GOV)

**APPLICATION FOR CERTIFICATION  
FOR THE PALEN SOLAR POWER  
PLANT PROJECT**

**Docket No. 09-AFC-7**

**PROOF OF SERVICE  
(Revised 7/2/10)**

**APPLICANT**

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**DECLARATION OF SERVICE**

I, Hilarie Anderson, declare that on July 12, 2010, I served and filed copies of the attached Letter to Alice Herron Regarding Information Requests. The original document, filed with the Docket Unit, is accompanied by a copy of the most recent Proof of Service list, located on the web page for this project at: [\[http://www.energy.ca.gov/sitingcases/solar\\_millennium\\_palen\]](http://www.energy.ca.gov/sitingcases/solar_millennium_palen)

The documents have been sent to both the other parties in this proceeding (as shown on the Proof of Service list) and to the Commission's Docket Unit, in the following manner:

**(Check all that Apply)**

**FOR SERVICE TO ALL OTHER PARTIES:**

- sent electronically to all email addresses on the Proof of Service list;
- by personal delivery;
- by delivering on this date, for mailing with the United States Postal Service with first-class postage thereon fully prepaid, to the name and address of the person served, for mailing that same day in the ordinary course of business; that the envelope was sealed and placed for collection and mailing on that date to those addresses **NOT** marked "email preferred."

**AND**

**FOR FILING WITH THE ENERGY COMMISSION:**

- sending an original paper copy and one electronic copy, mailed and emailed respectively, to the address below (***preferred method***);

**OR**

- depositing in the mail an original and 12 paper copies, as follows:

**CALIFORNIA ENERGY COMMISSION**

Attn: Docket No. 09-AFC-7  
1516 Ninth Street, MS-4  
Sacramento, CA 95814-5512  
[docket@energy.state.ca.us](mailto:docket@energy.state.ca.us)

I declare under penalty of perjury that the foregoing is true and correct, that I am employed in the county where this mailing occurred, and that I am over the age of 18 years and not a party to the proceeding.

**Original Signature in Dockets**  
**Hilarie Anderson**