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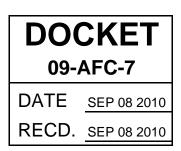
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September 8, 2010

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California Energy Commission Attn: Docket No. 09AFC7 1516 Ninth Street, MS-4 Sacramento, CA 95814-5512

Re: 09-AFC-7 Palen Solar Power Project

Dear Docket Clerk:

Enclosed are an original and one copy of CALIFORNIA UNIONS FOR RELIABLE ENERGY ISSUES STATEMENT THREE. Please process the document and provide us with a conformed copy in the envelope enclosed.

Thank you.

Sincerely,

/s/

Jason W. Holder

JWH:cnh Enclosures

STATE OF CALIFORNIA

Energy Resources Conservation and Development Commission

In the Matter of:

The Application for Certification for the Palen Solar Power Plant Project Docket No. 09-AFC-7

CALIFORNIA UNIONS FOR RELIABLE ENERGY ISSUES STATEMENT THREE

September 8, 2010

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Attorneys for the CALIFORNIA UNIONS FOR RELIABLE ENERGY California Unions for Reliable Energy ("CURE") submits this issues statement pursuant to the Committee's August 30, 2010, Notice of Mandatory Status Conference for the Palen Solar Power Project ("Project").

On September 1, 2010, Energy Commission Staff distributed a portion of its Revised Staff Assessment ("RSA") for the Project. CURE is currently reviewing Part 1 of the RSA.

Notably, Part 1 of the RSA does not include Staff's analysis in several resource areas, including Biological Resources, Cultural Resources, Land Use, Visual Resources and Soil & Water Resources. The analysis in these resource areas will be covered in Part 2 of the RSA. Until that analysis is released, CURE cannot identify whether any obstacles would hinder completion of this proceeding by December, 2010.

In its issue statement for this Status Conference, Staff recommended bifurcated evidentiary hearings for Parts 1 and 2 of the RSA. CURE does not oppose Staff's recommendation, as long as the adopted schedule allows sufficient time to review and, if necessary, prepare testimony on Part 2 of the RSA. CURE has reviewed the schedule proposed by Staff and, based on information currently available and in the spirit of cooperation, concurs with Staff's proposed schedule.

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Dated: September 8, 2010

Respectfully submitted,

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Attorneys for the CALIFORNIA UNIONS FOR RELIABLE ENERGY

DECLARATION OF SERVICE PALEN SOLAR POWER PROJECT Docket No. 09-AFC-7

I, Carol N. Horton, declare that on September 8, 2010, I served and filed copies of the attached **CALIFORNIA UNIONS FOR RELIABLE ENERGY ISSUES STATEMENT THREE** dated September 8, 2010. The original document, filed with the Docket Office, is accompanied by a copy of the most recent Proof of Service list, located on the web page for this project at: <u>http://www.energy.ca.gov/sitingcases/solar_millennium_palen/index.html</u>

The document has been sent to both the other parties in this proceeding (as shown on the Proof of Service list) and to the Commission's Docket Office via email and U.S. Mail as addressed below.

I declare under penalty of perjury that the foregoing is true and correct. Executed at Sacramento, CA on September 8, 2010.

/s/ Carol N. Horton

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