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California Energy Commission
Dockets Office, MS-4
Docket No. 09-RENEW EO-01
1516 Ninth Street
Sacramento, CA 95814-5512
Submitted in hard copy and electronically via docket@energy.state.ca.us

RE: Request for Postponement of Commission's Consideration of the Best Management Practices and Guidance Manual

Dear Chair Douglas and Energy Commissioners,

The Large-scale Solar Association¹ (LSA) and the Center for Energy Efficiency & Renewable Technologies (CEERT) respectfully request that the Energy Commission postpone consideration of the Renewable Energy Action Team's (REAT) Best Management Practices and Guidance Manual: Desert Renewable Energy Projects (Manual) until at least November. While we applaud all of the efforts of the REAT members in putting together this important guidance document, we are concerned about the lack of time for stakeholders to review and comment on this document. The 248 page Manual was released on September 14, 2010, giving stakeholders a week to both review and comment on the document before its scheduled hearing at the September 22nd Commission meeting. This simply does not provide enough time for stakeholders to provide the careful review and constructive feedback that this document merits.

Adopting appropriate policies and guidance for the siting and permitting of renewable projects is critical to the future of California's renewable industry. The guidance in the Manual could govern the development of renewable generation for many years to come. Given the significance and wide ranging effects of this Manual on the development of renewables in California, LSA and CEERT request the Commission provide sufficient time for the stakeholders to thoroughly review and comment on this document before adoption.

¹ LSA represents 10 of the nation's largest developers and providers of utility-scale solar generating resources. Collectively, LSA's members have contracted with utilities in California and the West to provide more than 6.5 gigawatts ("GW") of clean, sustainable solar power. Our members develop, own and operate various types of utility-scale solar technologies, including photovoltaic and solar thermal system designs. LSA and its individual member companies are leaders in the renewable energy industry, advancing solar generation technologies and advocating competitive market structures that facilitate significant integration of renewable energy throughout the western United States. LSA actively represents the interests of utility-scale solar development in California, Arizona, and Nevada, and also works to shape regional and federal policies that affect solar market development.

Thank you for considering this request. We look forward to providing the Commission with constructive feedback on the Manual.

Sincerely,



Shannon Eddy
Executive Director of the Large-scale Solar Association



V. John White
Executive Director of the Center for Energy Efficiency & Renewable Technologies

cc: Karen Douglas
James D. Boyd
Jeffrey D. Byron
Anthony Eggert
Robert B. Weisenmiller
Manal Yamout
Michael Picker
Janea Scott
Steve Black
Kevin Hunting
Jim Abbott