



455 Capitol Mall Suite 350  
Sacramento CA 95814  
Tel: 916.441.6575  
Fax: 916.441.6553

**DOCKET**

**09-AFC-10**

DATE OCT 28 2010

RECD. OCT 28 2010

October 27, 2010

California Energy Commission  
Dockets Unit  
1516 Ninth Street  
Sacramento, CA 95814-5512

**Subject: RICE SOLAR ENERGY, LLC'S PREHEARING CONFERENCE STATEMENT  
RICE SOLAR ENERGY PROJECT  
DOCKET NO. (09-AFC-10)**

Enclosed for filing with the California Energy Commission is the original of  
**RICE SOLAR ENERGY, LLC'S PREHEARING CONFERENCE STATEMENT** for the  
Rice Solar Energy Project (09-AFC-10).

Sincerely,

A handwritten signature in blue ink that reads "Marie Mills". The signature is fluid and cursive, with the first name "Marie" and last name "Mills" clearly distinguishable.

Marie Mills

Scott A. Galati  
**GALATIBLEK LLP**  
455 Capitol Mall  
Suite 350  
Sacramento, CA 95814  
(916) 441-6575

STATE OF CALIFORNIA

Energy Resources  
Conservation and Development Commission

In the Matter of:

Application for Certification for the  
**RICE SOLAR ENERGY PROJECT**

**DOCKET NO: 09-AFC-10**

**RICE SOLAR ENERGY, LLC'S  
PREHEARING CONFERENCE  
STATEMENT**

---

**INTRODUCTION**

Rice Solar Energy, LLC (RSE), a wholly owned subsidiary of Solar Reserve LLC, in accordance with 20 CCR § 1718.5 and the Committee Order dated October 13, 2010, hereby files its Prehearing Conference Statement for the Rice Solar Energy Project (RSEP). RSE is prepared to proceed to evidentiary hearing on all topic areas contained in the Staff Assessment / Draft Environmental Impact Statement (SA/DEIS).

In accordance with the above referenced order, RSE presents its Prehearing Conference Statement, as follows:

**A. Topic Areas Complete and Ready to Proceed To Evidentiary Hearing**

RSE believes that all topic areas (and/or disciplines) are complete and ready for adjudication at the Evidentiary Hearing. We believe the Committee has ample evidence to conclude that the RSEP will not result in significant environmental impacts and will comply with all applicable laws, ordinances, regulations and standards (LORS).

**B. Disputed Topic Areas**

RSE believes that there are very few disputed topic areas and most of them are minor. Some matters have been resolved at workshops since publication of the SA/DEIS and are expressed here to indicate the area of change and/or attention needed by the Committee. The particular topics are:

Agreed Upon Changes: Submitted on Declaration, no live testimony needed

- 1) Traffic and Transportation - RSE proposes agreed upon changes to TRANS-6 and TRANS-7; submitted by declaration.
- 2) Transmission System Engineering - RSE proposes agreed upon minor changes to analysis and TSE-5; submitted by declaration.

Minor Disputes: live testimony may be needed

- 3) Biological Resources - RSE is proposing clarifications to the Staff analysis and conditions related to mitigation acreage determination as well as minor changes to several conditions:
  - **BIO-10** – relating to requirements for revegetation;
  - **BIO-12** – modified to reflect that the Fall surveys have been completed; and,
  - **BIO-18** – modified to reflect USFWS prior recommendations for other CEC approved solar projects.
- 4) Cultural Resources – RSE is proposing miscellaneous minor clarifications and changes to several Conditions:
  - **CUL-9** - relating to methods of data collection and recording;
  - **CUL-11** - relating to public access and information; and,
  - **CUL-13** and **CUL-14** – relating to the funding of an exhibit at the General George S. Patton Memorial Museum in Indio, CA.

Substantive Disputes: live testimony needed

- 5) Visual Resources (and Land Use) – RSE submitted Opening Testimony under the impression that Staff would recommend Findings of Override in the area of Visual Resources. Since receiving the Testimony of Terry O'Brien recommending that the Commission not grant a Finding of Override, RSE contests the findings and conclusions of the SA/DEIS relating to the significance of the visual impacts Staff attributes to the RSEP. Based solely on the significance of the visual impacts, Staff then concludes in the Land Use analysis that the RSEP does not comply with certain policies contained in the Riverside County General Plan, deeming this a noncompliance with LORS and thereby requiring a Finding of Override. RSE does not agree that such a Finding is necessary.

RSE will file rebuttal testimony in the areas of Visual Resources and Land Use contesting Staff's methodology, assumptions, findings and conclusions. If the Committee does agree with RSE that no Finding of Override is necessary, RSE has included testimony in its Project Description Opening Testimony sufficient to support such a finding. Additionally, RSE has requested minor Changes to VIS-1 and VIS-3.

- 6) Worker Safety and Fire Protection – RSE disagrees with Staff’s evaluation methodology and Riverside County Fire Department’s (RCFD) contention that RSE causes impacts related to “draw down” of its resources. RSE has commissioned an independent expert analysis which was presented in a Fire Need Assessment (FNA) and Revised Fire Need Assessment (RFNA). This analysis developed recommendations to minimize and in some cases completely eliminate the need for RCFD to respond to the RSEP. RSE has accepted each of these recommendations and has presented in its Opening Testimony support for a finding that the mitigation incorporated into the RSEP is sufficient such that there are no remaining significant impacts on the RCFD that require the mitigation proposed by Staff in Conditions of Certification **WORKER SAFETY-7** and **-8**. RSE also proposes minor modifications to **WORKER SAFETY-10** and **WORKER SAFETY-11**

**C. Proposed Witnesses and Testimony**

Table 1 identifies the RSE witnesses including a brief summary of the subject areas of the testimony and an estimate of the amount of time necessary for direct live testimony. The table also identifies those areas where RSE believes live testimony is not warranted and therefore offers to submit the testimony upon sworn declaration.

**D. Cross-Examination**

Table 1 also identifies those witnesses (topic areas) that RSE will cross-examine, with an estimate of the amount of time necessary. RSE does not challenge the qualifications of any witness to provide expert testimony in accordance with the testimony received to date. A brief description of the subject areas in dispute that will encompass the scope of cross-examination is included in Table 1.

**E. Exhibit List**

Table 2 is RSE’s Proposed Exhibit List.

**F. Public Benefit and Need: Finding of Override**

As discussed above, the SA/DEIS identified potential unmitigatable impacts in Visual Resources (and Land Use as it relates to the consistency of the visual components of the Riverside County General Plan). RSE disagrees with Staff and believes that the RSEP will not result in unmitigatable significant impacts and that it will comply with all applicable laws, ordinances, regulations and standards (LORS). Should the Committee find that an Override is needed, we have incorporated into our Project Description testimony those project objectives, needs and public benefits that would support a Finding of Override by the Committee. Specifically the RSEP is on private previously disturbed land, has most if not all of its habitat compensation land in place, has no significant impacts in any technical areas, has a relatively short transmission line, has been located in an area that the Riverside County Planning Director believes was a great location for a solar facility,

produces renewable energy without the use of flammable materials, and most importantly is the only project in California that will provide energy storage.

**G. Scheduling**

In order to facilitate the current schedule, RSE requests that the Committee allow the parties to make a brief closing argument at the end of testimony for each section so that the Committee can decide whether or not briefs are necessary. At this time, RSE would not recommend briefing and if the Committee did require briefing that such briefing would not include closing argument regarding the facts and ultimate conclusions but be limited to well defined legal questions only.

RSE does not believe that it will be necessary for the Staff to prepare any Addendum, Supplement, or Errata to the SA/DEIS. For those areas of agreement that failed to make it into the SA/DEIS, RSE has included them in its written testimony so that Staff will only need to confirm (or disagree) at evidentiary hearing; doing so without any need to publish a supplemental assessment.

**H. Proposed Modifications to Conditions of Certification**

RSE has carefully reviewed the SA/DEIS and is in general agreement with the substantial majority of the Conditions of Certification. Conditions of Certification where RSE respectfully requests modifications are presented in our Opening and Rebuttal Testimony.

**CONCLUSION**

RSE is prepared to proceed to evidentiary hearing and believes that all of the evidence can be received and the record closed at the end of the evidentiary hearing scheduled for October 29, 2010. RSE appreciates the Committee's dedication to move the RSEP to a Decision by the end of the year.

Dated: October 27, 2010

Respectfully Submitted,

// original signed //

---

Scott A. Galati  
Counsel to Rice Solar Energy, LLC

**TABLE 1**

**Rice Solar Energy Project**  
**Proposed Witness List**

<b>TOPIC AREA</b>	<b>DISPUTES BETWEEN PARTIES</b>	<b>WITNESS</b>	<b>TESTIMONY SUMMARY</b>	<b>DIRECT TESTIMONY ESTIMATE</b>	<b>CROSS-EXAM ESTIMATE</b>
<b>ALTERNATIVES</b>	None	Doug Davy	Submitted on Declaration	None	None
<b>AIR QUALITY</b>	None	Jerry Salamy	Submitted on Declaration	None	None
<b>BIOLOGICAL RESOURCES</b>	Minor	Doug Davy	Proposed changes to Conditions of Certification relating to:  A global change reflecting a refined mitigation acreage matrix to be incorporated into the analysis and conditions; BIO-10: conforming revegetation language to other solar project language; BIO-12: modified to reflect fall survey completed; BIO-18: modified to reflect prior guidance by USFWS	1 hour, (if needed)	0.5 hours
<b>CULTURAL RESOURCES</b>	Minor	Doug Davy	Agreement on most changes made in Staff's testimony filed 10-21; but disagreement on Staff's CUL-13 and CUL14 which impose new burdens on RSE (videography, publications and financial); proposes new CUL-13	1 hour	0.5 hours

TOPIC AREA	DISPUTES BETWEEN PARTIES	WITNESS	TESTIMONY SUMMARY	DIRECT TESTIMONY ESTIMATE	CROSS-EXAM ESTIMATE
<b>FACILITY DESIGN</b>	None	Bob Anders Charles Diep Scott Kaminski	Submitted on Declaration	None	None
<b>GEOLOGY AND PALEONTOLOGY</b>	None	Doug Davy	Submitted on Declaration	None	None
<b>HAZARDOUS MATERIALS</b>	None	Doug Davy Scott Kaminski	Submitted on Declaration	None	None
<b>LAND USE</b>	Major	Bob Anders Debbie Builder	RSE is in Agreement with Conditions of Certification. Disagreement with General Plan policy inconsistency findings will be addressed in Rebuttal Testimony	0.5 hours For efficiency, anticipated to be part of combined Visual and Land Use panel testimony	0.5 hours
<b>NOISE AND VIBRATION</b>	None	Doug Davy	Submitted on Declaration	None	None
<b>POWER PLANT EFFICIENCY</b>	None	Bob Anders Scott Kaminski Charles Diep	Submitted on Declaration	None	None
<b>POWER PLANT RELIABILITY</b>	None	Bob Anders Scott Kaminski Charles Diep	Submitted on Declaration	None	None
<b>PROJECT DESCRIPTION</b>	None	Scott Kaminski Bob Anders	RSE agrees with Conditions of Certification. Additional information is submitted to reflect project objectives and benefits, Submitted on Declaration	None	None

TOPIC AREA	DISPUTES BETWEEN PARTIES	WITNESS	TESTIMONY SUMMARY	DIRECT TESTIMONY ESTIMATE	CROSS-EXAM ESTIMATE
PUBLIC HEALTH	None	Doug Davy	Submitted on Declaration	None	None
SOCIOECONOMICS	None	Doug Davy	Can rely on analysis performed in AFC	None	None
SOIL AND WATER RESOURCES	None	Bob Anders Mike Tietze	Submitted on Declaration	None	None
TRAFFIC AND TRANSPORTATION	None	Charles Diep Doug Davy	Minor change to Condition of Certification, TRANS-6 and TRANS-7. Submitted on Declaration	None	None
TRANSMISSION LINE SAFETY AND NUISANCE	None	Scott Kaminski	Submitted on Declaration	None	None
TRANSMISSION SYSTEM ENGINEERING	None	Scott Kaminski	Submitted on Declaration. Agreed upon changes to analysis and related condition.	None	None
VISUAL RESOURCES	Major	Charles Diep Doug Davy Thomas Priestley	Agree with Conditions of Certification; minor clarifications in VIS-1 and VIS-3. Disagreement with finding of significant unmitigatable impact will be addressed in Rebuttal Testimony	1 hour  For efficiency, anticipated to be part of combined Visual and Land Use panel testimony	1
WASTE MANAGEMENT	None	Doug Davy	Submit on Declaration	None	None



TOPIC AREA	DISPUTES BETWEEN PARTIES	WITNESS	TESTIMONY SUMMARY	DIRECT TESTIMONY ESTIMATE	CROSS-EXAM ESTIMATE
<b>WORKER SAFETY and FIRE PROTECTION</b>	Major	Bob Anders Wes Alston John Snell Scott Kaminski	Dispute with Staff and RCFD analysis and mitigation requests relating to WORKER SAFETY-7 and -8 which relate to amount of mitigation costs / fees required to be paid to RCFD. Staff has agreed to changes to WORKER SAFETY-10 and 11	2 hours	1 hour
<b>GENERAL CONDITIONS: COMPLIANCE</b>	None	Andrea Grenier	Submit on Declaration	None	None



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

Docket Number: 09-AFC-10

Date: \_\_\_\_\_

Project Name: Rice Solar Energy Project

**TABLE 2**  
**TENTATIVE EXHIBIT LIST**

Exhibit	Brief Description	Stipulation	Offered	Admitted	Refused	CEC Use Only
Exhibit 1	<b>Application for Certification Volumes I and II</b> , dated October 2009, and docketed on October 21, 2009.					
Exhibit 2	<b>Rice Solar Energy, LLC's Data Adequacy Supplement</b> , dated November 2009, and docketed on November 20, 2009.					
Exhibit 3	<b>Plan of Development Completion Letter</b> , dated February 9, 2010, and docketed on February 18, 2010.					
Exhibit 4	<b>Rice Solar Energy, LLC's Response to CEC Staff Data Requests 1 to 168</b> , dated March 2010, and docketed March 9, 2010.					
Exhibit 5	<b>Rice Solar Energy, LLC's Response to CEC Staff Water Resources Data Requests 130, 139 - 141, 143 - 144</b> , dated March 2010 and docketed on March 16, 2010.					

Exhibit 6	<b>Rice Solar Energy, LLC's Application for Authority to Construct General Form</b> , dated March 15, 2010, and docketed on March 26, 2010.					
Exhibit 7	<b>Rice Solar Energy, LLC's Draft Biological Assessment in Response to CEC Staff Data Requests 45, 47, and 48</b> , dated March 2010, and docketed April 1, 2010.					
Exhibit 8	<b>Rice Solar Energy, LLC's Response to CEC Workshop Queries 9 &amp; 10</b> , dated April 2010 and docketed on April 7, 2010.					
Exhibit 9	<b>Rice Solar Energy, LLC's Response to CEC Staff Workshop Queries 4, 6 - 8 &amp; 11</b> , dated April 2010, and docketed on April 12, 2010.					
Exhibit 10	<b>Rice Solar Energy, LLC's Response to CEC Staff Workshop Queries 1 - 3</b> , dated April 2010, and docketed on April 19, 2010.					
Exhibit 11	<b>Rice Solar Energy, LLC's Application for Authority to Construct &amp; Permit to Operate</b> , dated April 21, 2010 and docketed on April 21, 2010.					

Exhibit 12	<b>Rice Solar Energy, LLC's Response to CEC Staff Biological Resources, Data Requests 49-51, 54, 56, 58, 75 &amp; Response to CEC Staff Soil &amp; Water Resources Data Request 121</b> , dated April 2010 and docketed on April 27, 2010.					
Exhibit 13	<b>Riverside County Planning Department Consistency Letter</b> , dated _____, and docketed on April 27, 2010.					
Exhibit 14	<b>Rice Solar Energy, LLC's Response to CEC Staff Workshop Query 12</b> , dated April 2010, and docketed on April 29, 2010.					
Exhibit 15	<b>Rice Solar Energy, LLC's Response to CEC Data Request 61</b> , dated May 2010, and docketed on May 5, 2010.					
Exhibit 16	<b>Rice Solar Energy, LLC's Response to CEC Staff Data Request 46</b> , dated May 2010, and docketed on May 7, 2010.					
Exhibit 17	<b>Rice Solar Energy, LLC's Application for Authority to Construct - Wet Surface Air Cooler</b> , dated May 7, 2010, and docketed on May 7, 2010.					

Exhibit 18	<b>Rice Solar Energy, LLC's Mojave Fringe-toed Lizard Habitat Assessment</b> , dated May 2010, and docketed on May 14, 2010.					
Exhibit 19	<b>Rice Solar Energy, LLC's Interim Report on Avian Point Count &amp; Burrowing Owl Phase 2 Surveys</b> , dated May 9, 2010, and docketed on May 14, 2010.					
Exhibit 20	<b>Archival Search on Rice Army Airfield and Camp Rice</b> , dated May 14, 2010, and docketed on May 27, 2010.					
Exhibit 21	<b>Email from U.S. Army Corps of Engineers to the U.S. Environmental Protection Agency Documenting Non-Jurisdictional Status of RSEP</b> , dated May 27, 2010, and docketed on June 9, 2010.					
Exhibit 22	<b>Rice Solar Energy, LLC's System Impact Report</b> , dated May 14, 2010, and docketed on June 14, 2010.					
Exhibit 23	<b>Rice Solar Energy, LLC's Response to CEC Staff Workshop Query 13</b> , dated June 2010, and docketed on June 14, 2010.					
Exhibit 24	<b>Mojave Desert Air Quality Management District's Preliminary Determination of Compliance</b> , dated June 10, 2010, and docketed on June 15, 2010.					

Exhibit 25	<b>Rice Solar Energy, LLC's Project Letter Re: Federal Aviation Administration Process</b> , dated June 10, 2010 and docketed on June 15, 2010.					
Exhibit 26	<b>Rice Solar Energy, LLC's Supplementary Informational Item 1</b> , dated June 16, 2010, and docketed on June 16, 2010.					
Exhibit 27	<b>Rice Solar Energy, LLC's Supplemental Information Item 2 (Materials for Air Quality &amp; Public Health)</b> , dated June 2010, and docketed June 17, 2010.					
Exhibit 28	<b>Rice Solar Energy, LLC's Supplementary Information Item 3 - Draft Historic Property Treatment Plan</b> , dated June 2010, and docketed June 18, 2010.					
Exhibit 29	<b>Supplementary Information Item 4 - Preliminary Results of the Golden Eagle Aerial Surveys</b> , dated June 13, 2010, and docketed June 23, 2010.					
Exhibit 30	<b>Rice Solar Energy, LLC's Letter Regarding Riverside County Impact Fees &amp; Fire Department Requirements</b> , dated July 6, 2010, and docketed on July 6, 2010.					
Exhibit 31	<b>Rice Solar Energy, LLC's Supplementary Information Item 6, Revised General Arrangement</b> , dated June 11, 2010, and docketed on July 13, 2010.					

Exhibit 32	<b>Rice Solar Energy, LLC's Supplementary Information Items 7-11, Additional Information Regarding the Archaeological Features at Rice Army Airfield</b> , dated July 16, 2010, and docketed on July 16, 2010.					
Exhibit 33	<b>Rice Solar Energy, LLC's Comments on the Preliminary Determination of Compliance</b> , dated July 15, 2010, and docketed on July 19, 2010.					
Exhibit 34	<b>Rice Solar Energy, LLC's Proposed Conditions: Land Use &amp; Worker Safety</b> , dated July 16, 2010, and docketed on July 19, 2010.					
Exhibit 35	<b>Rice Solar Energy, LLC's Response to CEC Staff Data Request 72 - Spring 2010 Supplemental Botanical Inventory Report</b> , dated July 20, 2010, and docketed on July 21, 2010.					
Exhibit 36	<b>Letter from Western Area Power Administration to the California Office of Historic Preservation Regarding Plans to Construct the 150 Megawatt Rice Solar Energy Project</b> , dated July 13, 2010, and docketed on July 23, 2010.					
Exhibit 37	<b>Golden Eagle Survey Report</b> , dated July 21, 2010, and docketed on July 27, 2010.					

Exhibit 38	<b>Letter from U.S. Army Corps of Engineers to Sycamore Environmental Consultants, Inc.</b> , dated July 27, 2010 and docketed on August 2, 2010.					
Exhibit 39	<b>Mojave Desert Air Quality Management District's Final Determination of Compliance</b> , dated July 30, 2010, and docketed on August 5, 2010.					
Exhibit 40	<b>Rice Army Airfield Cultural Features Mapbook &amp; Index Map</b> , dated August 10, 2010, and docketed on August 16, 2010.					
Exhibit 41	<b>Rice Solar Energy, LLC's Supplementary Information Item 8, Biological Resources Vegetation &amp; Wash Channel Acreages</b> , dated August 23, 2010, and docketed on August 23, 2010.					
Exhibit 42	<b>Email from Rice Solar Energy, LLC Regarding Description of Heliostat Power &amp; Control Cables</b> , dated August 18, 2010, and docketed September 7, 2010.					
Exhibit 43	<b>Rice Solar Energy LLC's Fire Needs Assessment</b> , dated October 1, 2010, and docketed on October 1, 2010.					



Exhibit 44	<b>Rice Solar Energy, LLC's Full Load Rejection Stability Plots</b> , dated July 16, 2010, and docketed on October 12, 2010.					
Exhibit 45	<b>Rice Solar Energy, LLC's Responses to Supplemental Data Requests</b> , dated August 6, 2010, and docketed on October 12, 2010.					
Exhibit 46	<b>Rice Solar Energy, LLC's Fall 2010 Supplemental Botanical Inventory Report</b> , dated October 12, 2010, and docketed on October 13, 2010.					
Exhibit 47	<b>Rice Solar Energy, LLC's, Supplementary Information Item 9, Biological Mitigation Acreage Table and Map</b> , dated October 15, 2010, and docketed on October 15, 2010.					
Exhibit 48	<b>Rice Solar Energy, LLC's Opening Testimony Package Part 1</b> , dated October 18, 2010 and docketed on October 18, 2010.					
Exhibit 49	<b>Rice Solar Energy, LLC's Opening Testimony Package Part 2</b> , dated October 21, 2010, and docketed on October 21, 2010.					
Exhibit 50	<b>Rice Solar Energy, LLC's Revised Fire Needs Assessment</b> , dated October 25, 2010, and docketed on October 25, 2010.					
Exhibit 51	<b>Riverside County's Review of Rice Solar Energy Project for LORS Conformance</b> , dated August 31, 2010, and docketed on September 21, 2010.					

Exhibit 52	<b>Rice Solar Energy, LLC's Rebuttal Testimony Package</b> , dated October 27, 2010, and docketed on October 27, 2010.					
------------	---	--	--	--	--	--



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 *RICE SOLAR ENERGY POWER  
PLANT PROJECT***

**Docket No. 09-AFC-10**

***PROOF OF SERVICE***  
**(Revised 8/5/2010)**

**APPLICANT**

Jeffrey Benoit  
Project Manager  
Solar Reserve  
2425 Olympic Boulevard, Ste. 500 East  
Santa Monica, CA 90404  
[Jeffrey.Benoit@solarreserve.com](mailto:Jeffrey.Benoit@solarreserve.com)

**APPLICANT'S CONSULTANTS**

Andrea Grenier  
Grenier and Associates  
1420 East Roseville Parkway, Ste. 140-377  
Roseville, CA 95661  
[andrea@agrenier.com](mailto:andrea@agrenier.com)

Douglas Davy  
CH2MHILL  
2485 Natomas Park Drive, Ste. 600  
Sacramento, CA 95833  
[ddavy@ch2m.com](mailto:ddavy@ch2m.com)

**COUNSEL FOR APPLICANT**

\*Scott Galati  
Marie Mills  
Galati & Blek, LLP  
455 Capitol Mall, Suite 350  
Sacramento, CA 95814  
[sgalati@gb-llp.com](mailto:sgalati@gb-llp.com)  
[mmills@gb-llp.com](mailto:mmills@gb-llp.com)

**INTERESTED AGENCIES**

California ISO  
E-mail Preferred  
[e-recipient@caiso.com](mailto:e-recipient@caiso.com)

Liana Reilly  
Western Area Power Administration  
PO Box 281213  
Lakewood CO 80228-8213  
[reilly@wapa.gov](mailto:reilly@wapa.gov)

Allison Shaffer  
Bureau of Land Management  
Palm Springs/South Coast Field Office  
1201 Bird Center Drive  
Palm Springs, Ca 92262  
[allison\\_shaffer@blm.gov](mailto:allison_shaffer@blm.gov)

**INTERVENORS**

**ENERGY COMMISSION**

ROBERT WEISENMILLER  
Commissioner and Presiding Member  
[rweisenm@energy.state.ca.us](mailto:rweisenm@energy.state.ca.us)

KAREN DOUGLAS  
Chairman and Associate Member  
[kldougl@energy.state.ca.us](mailto:kldougl@energy.state.ca.us)

Kourtney Vaccaro  
Hearing Officer  
[kvaccaro@energy.state.ca.us](mailto:kvaccaro@energy.state.ca.us)

John Kessler  
Siting Project Manager  
[jkessler@energy.state.ca.us](mailto:jkessler@energy.state.ca.us)

Deborah Dyer  
Staff Counsel  
[ddyer@energy.state.ca.us](mailto:ddyer@energy.state.ca.us)

\*Jennifer Jennings  
Public Adviser's Office  
E-mail preferred  
[publicadviser@energy.state.ca.us](mailto:publicadviser@energy.state.ca.us)

**DECLARATION OF SERVICE**

I, Marie Mills, declare that on October 27, 2010, I served and filed copies of the attached, **RICE SOLAR ENERGY, LLC'S PREHEARING CONFERENCE STATEMENT, dated October 27, 2010**. 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/ricesolar>].

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-10**

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.



\_\_\_\_\_  
Marie Mills