

# ROCKLAND CAPITAL

24 WATERWAY AVENUE, SUITE 800

THE WOODLANDS, TX 77380

PHONE: 281.863.9000

FAX: 281.298.8733

July 29, 2011

California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814

Attention: Mary Dyas  
Compliance Project Manager

Subject: La Paloma Generating Plant (98-AFC02C)  
Staff Analysis of Proposed SunGen 1 Gen-Tie Interconnection

<b>DOCKET</b>	
<b>98-AFC-2C</b>	
DATE	JUL 29 2011
RECD.	AUG 18 2011

Dear Mrs. Dyas:

The California Energy Commission (the "Commission") sent Mr. Zenis Walley, EHS Manager at the La Paloma Generating Plant ("LPGP"), a letter dated June 1, 2009 whereby the Commission approved the proposed SunGen 1 Gen-tie interconnection within the LPGP boundaries.

The Commission's letter was in response to a submittal received by the Commission on March 23, 2009 from CEH Ventures, LLC. In April of 2010, CEH Ventures, LLC lost all rights to the property where their SunGen I solar project was to be located.

In April 2010, Rockland Capital, LLC ("Rockland") became an equity owner of La Paloma Generating Company, LLC ("LPGC"), the direct owner of LPGP, and replaced Complete Energy Holdings, LLC, the direct owner of CEH Ventures, LLC, as the manager of LPGP. During this time, Complete Energy Holdings, LLC relinquished all equity ownership and rights in LPGC.

In August 2010, Rockland started a new solar development project on the subject property and its affiliate has since entered into a Land Option Purchase Agreement with LPGC for the exclusive rights to the property.

Rockland is proposing the SunGen Solar PV Generating Project ("SunGen"), a 30 megawatt ("MW") solar photovoltaic ("PV") facility to be located within the same approximately 398-acre parcel of private land, which is adjacent to the existing LPGP. Both the subject land and LPGP are owned by LPGC.

SunGen is proposing to interconnect into the existing Midway-La Paloma 230 kV transmission line after the line exits the LPGP's high voltage switchyard. As the Commission is aware, LPGP is a 1,048 MW power plant located near McKittrick, in Kern County, California. LPGP, including the transmission line, was certified by the Commission in October 1999.

The proposed SunGen PV facility located on private land will be addressed by the Kern County Planning Department's Conditional Use Permit ("CUP") and related California Environmental Quality Act review

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processes. Rockland submitted a CUP with the County on March 10, 2011. The County deemed the CUP application complete on April 8, 2011. A copy of the CUP application is enclosed.

The proposed SunGen Gen-tie line will be located on private and federal land to supply power to the California power grid at the nearest point of interconnection. It will cross a small private land parcel west of LPGP that was previously approved by the Commission for use as a laydown area; however, it will not enter the LPGP plant site. Thus, construction and operation of the proposed Gen-tie will not impact the LPGP facilities and operations.


A portion of the proposed Gen-tie line, the SunGen substation and the Gen-tie interconnection will be located on federal land. A Standard Form 299 Application for Transportation and Utility Systems and Facilities on Federal Land (Right-of-Way) was submitted to the Bureau of Land Management ("BLM") on April 11, 2011. The BLM deemed the Right-of-Way application complete on June 21, 2011. A copy of the Right-of-Way application is enclosed.

Rockland filed an interconnection request with the CAISO on September 28, 2010 to have SunGen studied through the CAISO's Small Generator Interconnection Process. The CAISO deemed the interconnection request complete and is currently studying the interconnection. The results of the CAISO study are expected by the end of August 2011.

The main difference between Rockland's proposed SunGen solar PV project and CEH Ventures, LLC's proposed project is that the Gen-tie interconnection point has been relocated onto BLM land and the SunGen substation has been located near the Gen-tie interconnection point. These two changes were made to 1) reduce project costs by having a shorter and lower voltage Gen-tie line, 2) reduce the amount of disturbance and environmental impacts, 3) to remove the Gen-tie interconnection off of LPGP property, and 4) to reduce potential safety concerns.

Rockland is requesting input whether the Commission has a jurisdictional interest in the proposed SunGen Gen-tie interconnection to the Midway-La Paloma transmission line, and if so Rockland hereby requests the Commission's approval of the proposed Gen-tie interconnection.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Shane Litts', with a stylized flourish at the end.

Shane Litts  
Partner