

## CALIFORNIA ENERGY COMMISSION

1516 NINTH STREET  
SACRAMENTO, CA 95814-5512



August 19, 2011

Shane Lattis  
Partner  
Rockland Capital  
24 Waterway Avenue, Suite 800  
The Woodlands, TX 77380

**DOCKET****98-AFC-2C**DATE AUG 19 2011RECD. AUG 19 2011

**SUBJECT: LA PALOMA GENERATING PLANT (98-AFC-2C) – STAFF REVIEW OF  
ENERGY COMMISSION JURISDICTIONAL INTEREST IN PROPOSED  
SUNGEN GEN-TIE INTERCONNECTION**

Dear Mr. Lattis:

On August 3, 2011, the California Energy Commission (Energy Commission) received your letter requesting input whether the Energy Commission has a jurisdictional interest in the proposed SunGen Gen-tie interconnection to the Midway-La Paloma transmission line. Energy Commission staff reviewed the proposed SunGen 1 Gen-tie interconnection submitted by CEH Ventures, LLC in 2009, and approved the proposed Gen-tie interconnection within the La Paloma Generating Plant (LPGP) boundaries. However, staff did note, in a letter dated June 1, 2009 (enclosed), that the proposal was not a modification to the existing La Paloma Generating Plant and did not fall under the Energy Commission's jurisdiction.

Energy Commission staff reviewed your letter which pertains to the relocation of the Gen-tie interconnection point to the Midway-La Paloma transmission line. Staff has determined that the proposed Gen-tie will not impact the LPGP facilities and operations and that the portion of the project previously located on LPGP property has been moved to federal land under the Bureau of Land Management jurisdiction. Staff has concluded that the project interconnection proposed by Rockland Capital, equity owner of La Paloma Generating Company, LLC, is not a modification to the existing LPGP and does not fall under the Energy Commission's jurisdiction.

Sincerely,

A handwritten signature in black ink, appearing to read "Mary Dyas".

Mary Dyas  
Compliance Project Manager

Enclosure

cc: Dockets

# ROCKLAND CAPITAL

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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

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,



Shane Litts  
Partner