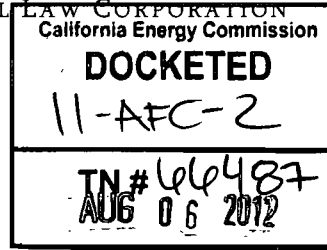


# BRIGGS ALEXANDER

A PROFESSIONAL LAW CORPORATION  
California Energy Commission

ROBERT W. BRIGGS, RET.  
LEON C. ALEXANDER  
SUE ANN IBRAHIM  
PETER SUNUKJIAN  
NATHALIE ADOURIAN  
JEFFREY WEBER

OF COUNSEL  
BRIAN C. OSTLER, SR.  
ANDREW H. DO



## **\*URGENT RESPONSE REQUESTED IN REGARD TO THE HIDDEN HILLS SOLAR PROJECT\***

July 31, 2012

### **Sent Via U.S. Mail**

Mike Monasmith  
Project Manager  
Siting, Transmission and Environmental Protection (STEP) Division  
California Energy Commission  
1516 Ninth Street, MS-2000  
Sacramento, CA 95814

**Re: Hidden Hills Solar Electric Generating System**  
**Application Docket Number: 11-AFC-2**  
**Parcel No.: 048-690-08**

Dear Mr Monasmith:

This office serves as legal counsel for Peggy Tsiamis and her parents who are owners of a twenty acre parcel located in Hidden Hills, Section 27, Inyo County, APN# 048-690-08. ("Tsiamis Parcel") The Tsiamis family has owned the parcel for almost fifty years. On June 6, 2011 BrightSource approached our client in an attempt to purchase the Tsiamis parcel in conjunction with the solar energy project they are attempting to construct in Hidden Hills, California. The application for this project is currently before your commission for approval.

This correspondence is to inform you that we are of the option that BrightSource is not dealing in good faith with property owners in the area. We are informing your office because as the civil agency responsible for approving the proposed project you should be aware of the tactics being implemented by your applicant in an attempt to strong arm the citizens of the area out of their property at unfair prices. In a brief review of their proposal to your office it is apparent that BrightSource has included the Tsiamis parcel in their application in advance of coming to any type of agreement with the property owners. Further, BrightSource has threatened to remove our clients parcel from their application if we do not accept their unreasonable offer. With this large project in the area pending, and the prospect of solar panels being directly adjacent to the Tsiamis parcel, we feel the parcel will be almost useless unless it is sold to BrightSource. This dilemma has led our client to explore their legal options, including but not limited to an inverse condemnation lawsuit.

It seems BrightSource is attempting to low-ball the individual property owners in the area of the project and gain a monopoly on all of the surrounding real estate. We are of the opinion that at this point the California Energy Commission is inadvertently supporting BrightSource's coercive strategy to monopolize real estate in the area and provide an artificial market place for the purchase of property, by ignoring the tactics used by BrightSource to obtain the necessary property for their proposed project.

Again, this letter is merely to update you on the position that BrightSource is placing citizens of the area surrounding the project in with a hope you will choose to take action to remedy the situation. Please respond within fifteen days with any feedback and if necessary we are open to an informal meeting to go over the situation.

If you have any questions feel free to contact my office.

Sincerely yours,

Law Offices of Briggs & Alexander  
A Professional Law Corporation  
**DICATED BUT NOT READ**  
Leon Alexander, Esq.