



AMARGOSA CONSERVANCY

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February 4, 2013

California Energy Commission

DOCKETED
11-AFC-02

TN # 69374

FEB. 04 2013

Mike Monasmith
Senior Project Manager
Systems Assessment & Facility Siting Division
California Energy Commission
1516 Ninth Street, MS-15
Sacramento, CA 95814
Subject: Opening Testimony of Proposed Intervenor Amargosa Conservancy
Hidden Hills Solar Electric Generating System (11-AFC-2)

Dear Mr. Monasmith:

On behalf of the proposed intervenor, Amargosa Conservancy, please find attached a copy of the Opening Testimony of Brian Brown and Andrew Zdon.

Sincerely,

Donna Lamm
Executive Director

The mission of the Amargosa Conservancy is to protect the land, water, and beauty of the
Amargosa

STATE OF CALIFORNIA

Energy Resources Conservation and Development Commission

In the Matter of:

APPLICATION FOR CERTIFICATION
FOR THE HIDDEN HILLS SOLAR
ENERGY GENERATION PROJECT

DOCKET NO. 11-AFC-2

INTERVENOR AMARGOSA CONSERVANCY

Testimony of Brian Brown

Re: the Proposed hidden Hills Solar Electric Generation System

Docket No. 11-AFC-2

Summary of Testimony

The Amargosa Conservancy (AC) was incorporated in 2005 to preserve the land, water and beauty of the Amargosa region. Maintaining the region's water resources, largely dependent on groundwater, is crucially important for the AC, for me personally, and for the entire region. I am aware that groundwater pumping in the Pahrump Basin Nevada has exceeded sustainable yields in the past, and that water levels have been steadily dropping in both the Nevada and California portions of the Basin. The Amargosa Wild and Scenic River as well as our small local communities in California are dependent on perennial sources of water. The Amargosa Conservancy has supported water studies that are as yet incomplete, and we simply do not know the extent to which HHSEGS pumping will affect water resources in the nearby Amargosa basin. Absent that understanding, the CEC should impose very conservative conditions on incremental water use. We are concerned about the long term effects of water use by the HHSEGS project, as well as the cumulative impacts of additional water use by other renewables projects slated for Nevada and development that will follow in the wake of these projects. The Final Staff Assessment (FSA) Water Supply (WS) conditions seem well designed to protect water dependent resources and groundwater levels in the immediate vicinity of the project, and we support these conditions as written, with two exceptions. 1. Additional protection for the Amargosa Basin and river system in the form of additional monitoring wells and water level trigger conditions is needed. 2. Compensatory mitigation conditions for project water use are insufficient and would not assure that water use would not increase as a result of project pumping.

Qualifications

My family has owned property and operated small businesses in the Amargosa region of the Mojave Desert for four generations. My wife Bonnie and I have owned and operated China Ranch in Tecopa, California since 1984. We grow and market dates, operate a gift shop and bakery, cultivate and sell date palms and cactus, and live in an adobe house that we built ourselves on the Ranch. I also work part time for the Amargosa Conservancy, and am currently responsible for watershed coordination and protection. I have been involved in the successful inclusion of local reaches of the Amargosa River in the national Wild and Scenic River system, in the AC's support for and results from the conduct of extensive regional water studies, and in community activities in the Tecopa and Shoshone area for much of my life.

Statement

As a local landowner and businessman, I am dependent on the region's water resources to support my livelihood—my agricultural business, my family and China Ranch's beautiful riparian corridor. The Amargosa's unique desert aquatic system also is the source of ecotourism here and in Death Valley that is almost the sole source of economic activity sustaining our local communities. We all depend here on groundwater.

As part of my staff work for the Amargosa Conservancy, I have been involved in the long standing informal partnership between the US Geological Survey, the Bureau of Land Management, the AC, The Nature Conservancy, to fund and conduct studies on the hydrology of the Amargosa River, to determine its sources and protect the perennial flow in the local streams and springs. Those studies will be described in the testimony of Andrew Zdon, a hydrological consultant for the Amargosa Conservancy and The Nature Conservancy. Existing data and studies have not resolved the uncertainty over where our water comes from.

I am aware that the Amargosa Conservancy, The Nature Conservancy, and public agencies have made significant, long-term conservation investments in the Amargosa region, with federal, state, and local grant funds. These investments, include not only water studies, but embrace extensive habitat acquisition and restoration in both California and Nevada, trail and passive recreational development, and public education.

I have helped to educate local communities on our groundwater-based system, and conducted many field trips to show people Willow Creek, the Amargosa River, and the amazing fresh water springs that help supply perennial flow to the river.

If that water were to disappear, life here would dry up and go away. The CEC should limit any additional withdrawals of groundwater from wells in the Pahrump Valley basin in California and should very carefully regulate and condition pumping to avoid the long term desiccation of this vital groundwater-dependent system.

I have made the trip from China Ranch to Las Vegas along the Old Spanish Trail Highway countless times, passing by the proposed site of the HHSEGS. I believe that the HHSEGS facilities would change the existing area from one that has long been treasured as a desert wilderness expanse to an industrial appearance. I believe that the enormous towers with hundreds of thousands of mirrors would adversely affect appreciation of a largely intact segment of the Old Spanish Trail and Native American cultural sites.

A more important concern is development that would likely follow the installation of the proposed new natural gas pipeline and electrical transmission line to the Pahrump vicinity that will service the HHSEGS project—and what that development would mean for further decline of the regional aquifers, which are already overused.

Based on my life and experience here, I do not believe that the local communities in California support the construction of the HHSEGS. In fact, I think that many residents and business strongly oppose this development.

The Amargosa Conservancy and The Nature Conservancy previously supplied comments on the HHSEGS project to the Commission. These comments were included in the record, and we ask that the Commission include those comments be adopted as part of my testimony in this manner.

In addition, the Bureau of Land Management sent a letter to the Commission regarding water resources, signed by the California and Nevada state directors, dated March 12, 2012. That letter, which was also previously included in the record, recommends monitoring and mitigation measures for the Amargosa resources similar to those I have outlined above, and we ask that the content of that letter be made part of my testimony.

DECLARATION OF:

Brian Brown

I, Brian Brown, declare as follows:

1. I am presently employed, part time, by the Amargosa Conservancy as watershed coordinator, and am a local businessman, proprietor of China Ranch Date Farm in Tecopa, California, and long time resident of the Amargosa region.
2. I prepared the testimony on behalf of the Amargosa Conservancy based on my work with the Conservancy on water and other matters discussed therein, my long residency and familiarity with the area, and my community and work experience.
3. It is my opinion that the prepared testimony is valid and accurate with respect to the issues addressed in it.
4. I am personally familiar with the facts and conclusions related in the testimony and if called as a witness could testify competently thereto.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: February 4, 2013

Signed: Brian Brown

At: Tecopa, California

STATE OF CALIFORNIA

Energy Resources Conservation and Development Commission

In the Matter of:

APPLICATION FOR CERTIFICATION
FOR THE HIDDEN HILLS SOLAR
ENERGY GENERATION PROJECT

DOCKET NO. 11-AFC-2

INTERVENOR AMARGOSA CONSERVANCY

Testimony of Andrew Zdon, P.G., C.E.G., C.Hg.

**Re: Water Resources Effects from the Proposed Hidden Hills Solar Electric
Generation System**

Docket No. 11-AFC-2

Summary of Testimony

The Water Supply (WS) and Biological Resources (BR) conditions proposed by CEC staff in the Final Staff Assessment (FSA), would not adequately protect the Amargosa Wild and Scenic River and its stream and spring tributaries. Additional wells and monitoring conditions would be necessary to ensure that Amargosa river system and its groundwater dependent resources will not be adversely affected.

The hydrology of the area is not well known. The project's groundwater pumping in the currently overdrafted Pahrump Valley Groundwater Basin will remove water from storage that could propagate impacts to the Amargosa River and its tributaries in the coming decades. The connection between the Pahrump Valley Groundwater Basin and the Amargosa Basin, particularly in the California Valley area, is poorly understood. To assume either a connection or lack of connection in groundwater flow between the two valleys would be speculative. Groundwater level trigger conditions, coupled with appropriate monitoring and predictive modeling should be added by the Commission--much as those proposed by the Commission to protect resources (Stump Springs) located in Nevada. The most recent report for the Amargosa Conservancy outlines the most recent findings from Johnson Wright field work and outlines proposed additional conditions. These conditions would protect those resources, and a similar model should be extended to protect water and water-dependent resources in the Amargosa. The conditions outlined are similar to those proposed in a March 2012 BLM letter from the

California and Nevada state directors to the Commission, which is part of the HHSEGS record.

In sum, the Applicant's hydrology reports and aquifer tests do not support the conclusions, and revisions to FSA, that the Applicant has proposed. My attached report on the FSA and the Applicant's testimony in response to the FSA outline my conclusions on these issues. That report supplements an earlier Johnson Wright report on HHSEGS hydrology issues that was made part of the HHSEGS record as an attachment to comments offered on the Preliminary Staff Assessment by The Nature Conservancy docketed July 25, 2012. Adoption of the Applicant's changes would likely have a significant adverse impact to water resources in the Pahrump Basin and potentially on the Amargosa resources further to the southwest in California Valley and beyond. My most recent work in the Amargosa suggests that the amount of water in the Amargosa basin is more limited than earlier thought. This underlies the need for the Commission to impose very conservative conditions for any new, steady use of water in the basin.

This proposed HHSEGS project groundwater pumping, especially in conjunction with other renewables projects and development associated with a new natural gas pipeline and transmission line in the area, would significantly impact groundwater resources and cause far larger drawdown and far reaching effects in this already overdrafted aquifer than acknowledged in either the FSA or the applicant's analyses.

Qualifications

My qualifications are provided on my attached resume and as outlined below.

I have more than 25 years of experience as a geologist and hydrogeologist in California and Nevada. I have specialized in Mojave and Great Basin desert hydrology, and, in particular, over the last 3 years, in active studies focused on the Amargosa watershed. I am a Principal Hydrogeologist with Johnson Wright, Inc., based in California.

I have a Bachelor of Science in Geology from Northern Arizona University, and am a California Professional Geologist, Certified Hydrogeologist and Certified Engineering Geologist.

MEMORANDUM

Date: February 1, 2013

To: Donna Lamm, Amargosa Conservancy

From: Andy Zdon, PG, CEG, CHg, Johnson Wright, Inc.

Subject: Comments re: California Energy Commission (CEC) Staff Assessment, Water Supply, Proposed Hidden Hills Solar Electric Generating System (HHSEGS)

Johnson Wright, Inc. is pleased to provide the following comments regarding the CEC Staff Assessment (Assessment) regarding the water supply for the proposed HHSEGS. CEC staff has prepared a thoughtful and thorough review of the project's water supply and related impacts. JWI also believes that the conservative mitigation proposed for the project is generally protective of the environment - particularly key receptors such as Stump Springs and local wells. However, we also believe that more thorough consideration of potential impacts to the Amargosa River basin should be addressed.

On behalf of the Amargosa Conservancy (AC) and The Nature Conservancy (TNC), JWI's staff have been conducting hydrogeologic investigations and monitoring in the Amargosa Basin with an emphasis on the Shoshone-Tecopa area. The findings to date have been discussed in the 2011 and 2012 AC State of the Basin Reports, and in JWI's report to TNC regarding two new monitoring wells installed north of Shoshone and at Willow Creek. These findings demonstrate that both the conceptual model of the Amargosa Basin and the character of the Amargosa River itself are substantially different from what was previously thought. This difference results from the lack of hydrologic data over large areas of the basin prior to our activities. It follows that substantial uncertainty is associated with the conceptual model of the Amargosa River, and particularly with respect to groundwater movement from Pahrump Valley to the Amargosa Basin.

Uncertainty associated with a basin conceptual model leads to greater risk associated with groundwater management decision-making. In the case of the proposed HHSEGS, the risks to the groundwater system and receptors such as Stump Springs and the Amargosa River are demonstrated by the uncertainty associated with underflow from Pahrump Valley to the Amargosa River via California Valley.

There are also known conditions of the basin that are indicative of risks to the groundwater system and receptors. Geochemical sampling of springs in the Amargosa Basin and of the

Amargosa River indicate mixed sources of water and suggest alluvial origins for much of the spring flow seen. Further, given the extensive fine-grained lakebed deposits that are observable both on the surface, and as seen in borings for monitoring wells in the Shoshone-Tecopa area and Chicago Valley, the volume of water moving through the Amargosa Basin, which feeds the springs within, could be significantly less than previously thought. If the volume of water is less than previously thought, small changes to the Amargosa groundwater system could result in substantial impacts to spring flow and the river itself. Spring flow supplies municipal, domestic, agricultural, wildlife, stock watering and recreational uses in the Shoshone-Tecopa area. A minor lowering of the groundwater surface in the area could have a substantial impact to the springs, seeps and wells that supply human and natural communities and the local economy.

The Assessment identifies a link between the water supply in the project area and the Amargosa Basin as being speculative. However, a direct flow path from the project area toward California Valley in the Amargosa Basin is presented in Figure 2 of the Assessment. Ultimately, there is inadequate data available to have any confidence of underflow, or the lack of underflow, between the project area and California Valley. JWI has recommended a modest scope of work (three monitoring wells with geochemical sampling) to evaluate groundwater geochemical signatures in the California Valley in comparison to project wells, and to evaluate hydraulic gradients from the project area to California Valley. While that scope of work would substantially address this uncertainty, it has not been funded. Given the uncertainty, conservative mitigation related to potential impacts to the Amargosa Basin is recommended.

Known conditions also illustrate the risk attached to the project's water supply. It is noted in the Assessment, and particularly in Figure 3, that groundwater levels across the Pahrump Valley and in the proposed project area have been substantially drawn down over the past several decades. Groundwater levels generally have not recovered from the drawdown observed. CEC staff's statistical analysis of groundwater levels in the project area indicate that they continue to decline. Whether this is due to the limited pumping in the project area, such as from Charleston View, or represents a lagging drawdown response from more substantial drawdown east of the Pahrump-Stewart Valley Fault Zone is unclear. However, what can be extrapolated is that potential impacts that do occur from project pumping, for instance to Stump Spring, will not be easily rectified by decreasing or stopping pumping.

Another known condition that illustrates the risk is attached to Stump Spring itself. CEC staff recognize that the hydraulics of the spring are poorly understood, but may be related to the presence of an aquitard as presented on Figure 17 of the Assessment. JWI's review of the Stiff diagrams presented as Figure 4 of the Cardno Entrix response to the Assessment demonstrate waters of similar source for all samples above and below the aquitard, but with the Stump Spring sample impacted by evapotranspiration. This "known" information leads to the risk that groundwater level declines in the Stump Spring Well may only become observable after substantial declines in deeper aquifers beneath Stump Spring. The lagged

effect of these observations being caused by the presence of the aquitard. JWI recommends that a monitoring well be completed in the same zone as pumping, in the immediately vicinity of the Stump Spring Well, to further reduce risk to this resource.

As stated earlier, JWI believes that the conservative water supply mitigation recommendations by CEC staff are warranted and should be adopted assuming the project is approved.

- The 0.5-ft trigger, with the modification described in this memorandum
 - Relaxing the mitigation recommendations could be possible with further reliable hydrogeologic investigation and long-term monitoring. The 0.5-ft trigger is the only mitigation that is truly protective of Stump Spring.
- In addition,
 - A monitoring well at the head of California Valley would also be prudent.
 - A monitoring well should be completed in the same zone as pumping, in the immediately vicinity of the Stump Spring Well, to further reduce risk to this resource.
 - Three monitoring wells should be installed for geochemical sampling to evaluate groundwater geochemical signatures in the California Valley in comparison to project wells, and to evaluate hydraulic gradients from the project area to California Valley.
- While an effort to regain water through off-sets in basin-wide water usage through retiring water rights is prudent water policy, it should be recognized that retiring water rights and reducing pumping 20 miles north of the project area will have little effect on protecting the sensitive resources in the local area of the proposed project.
- We also believe that attempting to recharge occasional runoff from the alluvial fans would be of limited benefit, if any to mitigating potential project impacts.

ANDREW ZDON, P.G., C.HG., C.E.G.
Principal Hydrogeologist

SUMMARY

Mr. Zdon is a Principal Hydrogeologist with more than 24 years of hydrogeological experience in a variety of hydrogeology-related projects. He is a California Professional Geologist, Certified Hydrogeologist and Certified Engineering Geologist. Mr. Zdon is a recognized subject matter expert in the area of numerical groundwater flow modeling and has been an instructor at California State University, Los Angeles in Groundwater Models and Management. His specialties in numerical groundwater modeling including, flow and groundwater/surface water interactions, contaminant transport and dual-phase flow in a both unconsolidated sediment and fractured rock environments. Investigations in these areas can be in support of CEQA/NEPA analyses, water resource development evaluations, or providing third party review. As an expert hydrogeologist he has evaluated and modeled complex hydrogeologic conditions. He has been retained as an expert related to litigation on seven cases and has provided one declaration, been deposed twice, and testified in court on one occasion. These cases have involved a 70+ year old leaking oil pipeline, a 7,000-gallon fuel release in fractured volcanic rock above a town water supply system, well failure of two production wells. He is currently serving as an expert witness regarding hydrogeologic conditions associated with the shallow, principal and deep aquifers of the Orange County Groundwater Basin.

Mr. Zdon was appointed to serve on the first Technical Advisory Committee for the newly combined California Board for Engineers, Land Surveyors and Geologists. He also received Certificates of Commendation and Appreciation for his volunteer service as a Subject Matter Expert for the former California Board for Geologists and Geophysicists.

REGISTRATIONS / CERTIFICATIONS

State of California, Professional Geologist (No. 6006)
State of California, Certified Engineering Geologist (No. 1974)
State of California, Certified Hydrogeologist (No. 348)
State of Arizona, Registered Geologist (No. 33683)

EDUCATION

B.S., Geology, Northern Arizona University, 1984

REPRESENTATIVE PROJECTS

Water Resource Assessments, Mono County, California

Served as consultant to Mono County conducting groundwater availability assessments for several Mono County communities including: Antelope Valley (West Walker River); Mono City and Lee Vining (Mono Basin), Crowley and the Tri-Valley areas (Owens River). Work included conducting field reconnaissance activities, developing groundwater recharge estimates, evaluating local groundwater budgets, identifying potential future impacts due to regional growth, water quality issues, etc. He has also provided hydrogeologic support to the County of Mono with respect to reviewing and evaluating groundwater

modeling conducted to evaluate potential impacts caused by expansion of a geothermal plant in Mono County.

Hydrogeologic Evaluation, Amargosa River Basin, California and Nevada

Principal in Charge and project manager for ongoing basin-wide investigation of the water resources of the California-portion of the Amargosa River basin. Investigations have ranged from baseline data collection efforts to wide-ranging geochemical investigations (including isotope studies) of groundwater issuing from springs, from the Amargosa River, and from existing wells. Results have been groundbreaking, and have resulted in ongoing reevaluation of the conceptual model of this part of the basin (more than 2,000 square miles) that had been held for nearly 50 years. Being a spring-fed river, the investigations along the Amargosa River highlight the evaluation interactions between surface water and groundwater.

Numerical Flow Modeling, Owens Valley, Inyo County, California

Hydrogeologic consultant for the Owens Valley Indian Water Commission through the development of hydrogeologic data gathering, development of conceptual models for the Lone Pine Reservation, Big Pine Reservation and Bishop Reservation areas of the Owens Valley, and development of numerical groundwater models for each of these areas. The models developed provide these Paiute/Shoshone tribes with tools to evaluate the impacts on local reservations of water resource activities conducted by outside agencies.

Hydrogeology Expert, Orange County Groundwater Basin, California

currently serving as an expert witness regarding hydrogeologic conditions associated with the shallow, principal and deep aquifers of the Orange County Groundwater Basin with a focus on groundwater flow, Irvine Ranch Water District wellfield-caused hydraulic gradient changes, and the potential for shallow contamination to reach the principal and deep aquifers.

Geologic and Hydrogeologic Evaluation for Mine Reclamation Plan and associated Environmental Documentation, Sand and Gravel Mine, Mono County, California

Provided hydrogeologic analysis to evaluate the effects of mining on groundwater and nearby Rush Creek at the Mono Rock Sand & Gravel Mine within the Mono Basin, Mono County, California. Activities included defining baseline stream flow and water quality conditions, evaluating the potential for impacts from fuel spills and erosion from the mining operations on Rush Creek. In addition to this work contributing to the development of the mine reclamation plan for this operation, the results were used in the development of the environmental review documentation (CEQA) for the newly proposed mining operation.

Evaluation of Calcines at Closed Mercury Mine, Humboldt County, Nevada

Conducted historic and technical evaluations regarding calcines disposition at the former Cordero Mercury Mine in Humboldt County, Nevada. Activities included identifying areas where calcines had been used as fill in nearby community, and an evaluation of the geologic characteristics of waste rock and calcines present at the Cordero and nearby mines, along with developing a chronology of operations and land ownership of the mine to evaluate cost allocation scenarios associated with adjacent and on-site mine operations.

Watershed Assessment, Flow Modeling and Impact Analysis for Increased Pumping, Sierra Nevada, Mono County, California

Consultant to Mammoth Mountain Ski Area in a joint project with the Mammoth Community Water District regarding water resources issues associated with a proposed land transfer with the Inyo National Forest. Work involved developing conceptual model and associated preliminary numerical groundwater flow model of an eastern Sierra watershed, conducting field investigations to evaluate hydrogeologic parameters identified to be sensitive in the numerical model, and finalizing the numerical groundwater flow model through updating parameters and boundary conditions based on data obtained from the field investigations and performing a transient calibration. The final numerical model was used to evaluate potential groundwater impacts of the proposed project.

Hydrogeologic Characterization and Flow and Transport Modeling in Volcanic Terrain, Mono County, California

Served as expert witness and manager of environmental activities at 7,000-gallon gasoline release that occurred in faulted, volcanic terrain upgradient of a town water-supply well field. Work conducted at the site also included characterization of rock units including the use of rotary drilling and oriented-core drilling, surface and down-hole geophysical surveys, and extensive vapor and groundwater sampling. Developed a conceptual model and follow-up numerical groundwater flow and transport model to evaluate potential timing and magnitude of impacts to down-gradient town water-supply wells and associated remediation scenarios both to evaluate on-site remedial effectiveness and risk reduction associated with water supply.

Flow and Transport Modeling, Proposed Artificial Recharge Project, Santa Clara River, Ventura County, California

Groundwater flow and solute transport modeling (MODFLOW and MT3D) to evaluate potential effects of solvent, petroleum hydrocarbons, insecticide and/or herbicide spillage in planned artificial recharge facility along the Santa Clara River in Ventura County, California.

Effluent Seepage Modeling, Proposed Winery, San Luis Obispo County, California

Finite element modeling (SEEP-2D) of groundwater seepage with respect to evaporation ponds for a proposed winery, San Luis Obispo County, California. Results were used to evaluate pond-sizing, potential effects of seepage with respect to the stability of nearby slopes, and to evaluate the volume of effluent that would reach the water table at that location.

Seepage Modeling, Mine Tailings Mitigation, New Zealand

Provided technical oversight for finite element groundwater seepage modeling (SEEP/W) and hydrogeologic evaluation of tailings mitigation, Coeur Gold Golden Cross Mine Tailings Impoundment, New Zealand. Modeling was conducted to evaluate practicability of tailings dam dewatering schemes.

PROFESSIONAL ORGANIZATIONS

National Groundwater Association (NGWA)
Groundwater Resources Association of California (GRAC)
Nevada Water Resources Association (NWRA)
Society for Mining, Metallurgy and Exploration (SME)

DECLARATION OF:

Andrew Zdon

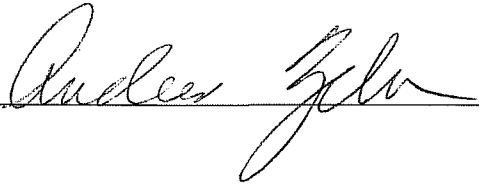
I, Andrew Zdon, declare as follows:

1. I am presently employed as a Principal Hydrogeologist by Johnson Wright, Inc., a hydrogeological consulting firm headquartered in Lafayette, California. I have been working professionally on hydrology in the Amargosa area of the Mojave Desert for more than five years. My resume is attached.
2. I prepared testimony for the intervenor Amargosa Conservancy based on my work under contract with with the Amargosa Conservancy and The Nature Conservancy on water and other matters discussed therein, my long experience and familiarity with the area, and my professional background.
3. It is my opinion that the prepared testimony is valid and accurate with respect to the issues addressed in it.
4. I am personally familiar with the facts and conclusions related in the testimony and if called as a witness could testify competently thereto.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: February 4, 2013

Signed: _____



At: Lafayette, California

DECLARATION OF SERVICE

I, Donna Lamm, declare that on February 4, 2013, I served and filed copies of the attached, dated February 4, 2013. This document is accompanied by the most recent Proof of Service.

The document has been sent to the other persons on the Service List above in the following manner: **(Check one)**

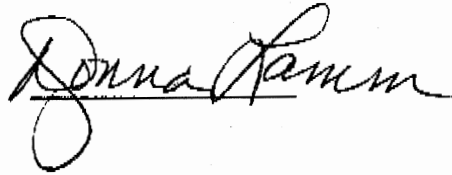
For service to all other parties and filing with the Docket Unit at the Energy Commission:

☒ I e-mailed the document to all e-mail addresses on the attached Service List and personally delivered it or deposited it in the US mail with first class postage to the Docket Unit at the Energy Commission and to the addresses list on the Service List for the Applicant; **OR**

☐ Instead of e-mailing the document, I personally delivered it or deposited it in the US mail with first class postage to all of the persons on the Service List for whom a mailing address is given.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that I am over the age of 18 years.

Dated: 2-4-2013

A handwritten signature in cursive script, appearing to read "Donna Lamm", written over a horizontal line.



**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**

***APPLICATION FOR CERTIFICATION FOR THE
HIDDEN HILLS SOLAR ELECTRIC
GENERATING SYSTEM***

Docket No. 11-AFC-02

**PROOF OF SERVICE
(Revised 1/16/13)**

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**ENERGY COMMISSION –
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COMMISSION DOCKET UNIT

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**OTHER ENERGY COMMISSION
PARTICIPANTS (LISTED FOR
CONVENIENCE ONLY):**

*After docketing, the Docket Unit
will provide a copy to the persons listed
below. Do not send copies of
documents to these persons
unless specifically directed to do
so.*

KAREN DOUGLAS
Commissioner and Presiding Member

TBD
Commissioner and Associate Member

Ken Celli
Hearing Adviser

Galen Lemei
Adviser to Commissioner Douglas

Jennifer Nelson
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