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February 6, 2013

Raoul Renaud, Hearing Officer
Christine Stora, Project Manager
CALIFORNIA ENERGY COMMISSION
1516 Ninth Street
Sacramento, CA 95814

California Energy Commission

DOCKETED
09-AFC-7C

TN # 69412

FEB. 06 2013

RE: Palen Solar Electric Generating System Amendment (Docket No. 09-AFC-7C)

Dear Hearing Officer Renaud and Ms. Stora:

The County of Riverside ("County") received the Petition to Amend the Energy Commission Decision for the Palen Solar Electric Generating System (Docket No. 09-AFC-7C) ("Petition") submitted by Palen Solar Holdings, LLC. The Petition proposes to eliminate the use of solar parabolic trough technology and replace it with BrightSource Energy, Inc.'s solar power tower technology. County staff is currently reviewing the Petition and the County anticipates providing further comments on the Petition in the coming months. However, we wanted to take a moment to highlight a potential concern regarding the change in technology and its possible interference on the County's Public Safety Enterprise Communication System Project ("PSEC") prior to Commission Staff's filing of an Issues Identification Report. The change from a parabolic trough technology to a heliostats-elevated mirror design with solar power towers represents a significant change in the County's initial review.

The County has invested \$178 million in PSEC, a new regional public safety voice and data communication network. When fully implemented in December of 2013, the PSEC system will provide voice and data communication for law enforcement and other public safety first responders. The PSEC system will deliver enhanced interoperability between public safety agencies through a network of seventy-seven radio sites throughout the County. Since the PSEC sites are secure sites, the County can only provide general locations in a public document.

Riverside County Information Technology ("RCIT") is concerned that the height of the two proposed 750 foot solar power towers may obstruct the PSEC microwave network. Microwave functions on a direct line of sight to the various connection points, and is the backbone of the PSEC network. Microwave provides the link to every site and a path back to the master site. If the proposed solar power towers are positioned between our microwave paths, then they will disrupt mission-critical PSEC communications, including those of law enforcement and other public safety first responders.

After a preliminary review, RCIT does not believe that the two solar power towers proposed in the Petition will block our current microwave paths. If the tower locations change, or after an A1 study for aircraft has been completed, RCIT would like the opportunity to re-run our microwave path profiles using the A1 coordinates to make a final determination on whether or not a line of sight issue exist.

Second, RCIT is concerned about the potential impact the large heliostat fields may have on the PSEC microwave network. Our microwave vendor confirmed our concerns. RCIT is concerned that the proximity of the heliostats to the County's communications tower located on the south side of Interstate

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10 at the Corn Springs exit could create reflections into the microwave dish. If this were to occur, our microwave network could be rendered inoperable from the Corn Springs exit. This microwave path supports public safety communications and any potential down time would be devastating to public safety and initial response times for emergencies.

Thank you for taking the County's concerns into consideration as Commission Staff prepares its Issues Identification Report. The County looks forward to working with Commission Staff and Palen Solar Holdings, LLC to resolve this issue. Should you have any questions about the contents of this correspondence, please contact Chuck Rushing, Radio Engineer II, RCIT, at (951) 955-3775 or Tiffany North, Deputy County Counsel at (951) 955-6300.

Sincerely,

PAMELA J. WALLS

County Counsel



TIFFANY N. NORTH

Deputy County Counsel



**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**

AMENDMENT

**FOR THE PALEN SOLAR ELECTRIC
GENERATING SYSTEM**

Docket No. 09-AFC-7C

**PROOF OF SERVICE
(EST. 1/30/13)**

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Christine Stora
Project Manager

Jennifer Martin-Gallardo
Staff Counsel

DECLARATION OF SERVICE

I, Maria Dusek, declare that on February 6, 2013, I served and filed copies of the attached letter from the County of Riverside, dated February 6, 2013. This document is accompanied by the most recent Proof of Service, which I copied from the web page for this project at: <http://www.energy.ca.gov/sitingcases/palen/compliance/>.

The document has been sent to the other parties in this proceeding (as shown on the Proof of Service) and to the Commission's Docket Unit, as appropriate, 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 Service List above and personally delivered it or deposited it in the US mail with first class postage to those parties noted above as "hard copy required"; **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: February 6, 2013


Maria Dusek
Maria Dusek