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09-AFC-5	
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April 15, 2010

Mr. Craig Hoffman
Project Manager
Siting, Transmission and Environmental Protection Division
California Energy Commission
1516 Ninth Street, MS-15
Sacramento, CA 95814

RE: REQUEST FOR AGENCY COMMENTS ON THE STAFF ASSESSMENT FOR THE PROPOSED ABENGOA MOJAVE SOLAR PROJECT (09-AFC-5)

Dear Mr. Hoffman:

Southern California Edison (SCE) appreciates the opportunity to review and provide comment on the Staff Assessment (SA) for the proposed Abengoa Mojave Solar Project. The project is described as a proposal to develop a 250-megawatt (MW) solar parabolic trough power generating facility and associated infrastructure on a total of approximately 1,765 acres of land within unincorporated San Bernardino County. The project is stated to be located approximately nine miles northwest of the town of Hinckley, approximately halfway between the City of Barstow and Kramer Junction (Highway 395/58 junction).

The SA indicates the power produced by the proposed project would connect to SCE's Kramer-Cool Water No. 1 230-kV transmission line, which is located adjacent to the southern border of the proposed project site. The SA also indicates that a new substation would be needed to interconnect the project into the existing Kramer-Cool Water No.1 230 kV transmission line.

Abengoa Solar Inc. (Abengoa) applied to the California Independent System Operator (CAISO) for interconnection, and requested and paid for Interconnection Studies in accordance with the CAISO Large Generation Interconnect Procedures (LGIP) Tariff. All applicable interconnection studies have been completed, and Abengoa is currently negotiating the execution of the Large Generator Interconnection Agreement (LGIA).

SCE proposes to construct the Lockhart Substation and associated transmission, distribution and telecommunication facilities to interconnect the Abengoa project to SCE's existing Cool Water-Kramer No.1 220 kV transmission line. SCE prepared a detailed description of these interconnection facilities, which has been provided to Abengoa. This description differs from the description contained in the SA.

When interconnection studies indicate the need for SCE to build new or relocate existing electrical facilities that operate at or above 50 kV, SCE construction may have environmental consequences subject to CEQA review as required by the California Public Utilities Commission (CPUC). If those environmental consequences are identified and addressed in the CEQA process for the larger project, SCE may not be required to pursue a later, separate, mandatory CEQA review through the CPUC's General Order 131-D (GO 131-D) process. If the SCE facilities are not adequately addressed in the CEQA review for the larger project and the new facilities could result in significant environmental impacts, additional CEQA review could delay approval of the SCE portion of the project for two years or longer.

We request that the description of interconnection facilities, and environmental analysis of those facilities, be included in the Supplemental Staff Assessment for the Abengoa project, because these facilities are

an integral part of the overall project which should be considered part of the whole action being evaluated by the CEC pursuant to CEQA.

Please note that portions of SCE's proposed interconnection facilities may cross Federal lands, potentially requiring additional environmental regulatory compliance pursuant to NEPA.

We look forward to working closely with the Abengoa and the CEC to support interconnection of this project into the CAISO grid. If you have any questions regarding this letter, please do not hesitate to contact me at (626) 302-7151 or via email at hamid.arshadi@sce.com.

Sincerely,

Hamid Arshadi, CPM
Licensing Project Manager
Transmission Projects Licensing, Renewables and Generator Interconnections
Southern California Edison Company

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