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August 14, 2007

### VIA FEDEX

CALIFORNIA ENERGY COMMISSION  
Attn: Docket No. 07-AFC-3  
1516 Ninth Street, MS-4  
Sacramento, California 95814-5512

File No. 020127-0012

<b>DOCKET</b> <b>07-AFC-3</b>
DATE <u>AUG 14 2007</u>
RECD. <u>AUG 14 2007</u>

Re: CPV Sentinel Energy Project: Docket No. 07-AFC-3

Dear Sir/Madam:

Pursuant to California Code of Regulations, title 20, sections 1209, 1209.5, and 1210, enclosed herewith for filing please find a copy of a letter from California ISO to CEC re Data Adequacy Determination for the above-referenced project.

Please note that the enclosed submittal was also filed today via electronic mail to your attention.

Very truly yours,



Paul E. Kihm  
Senior Paralegal

Enclosure

cc: Michael J. Carroll, Esq. (w/ encl.)



August 8, 2007

Mark Hesters  
California Energy Commission, MS-46  
1516 Ninth Street  
Sacramento, CA 95814

**Re: Data Adequacy Determination for CPV Sentinel Project, Docket No. 07-AFC-03**

Dear Mr. Hesters:

The California Energy Commission ("Commission") recently issued a data adequacy determination for the CPV Sentinel Project, Docket No. 07-AFC-03 ("the Project"). It has been brought to my attention that the application has not been found to be data adequate with respect to two transmission-related items. First, the Commission has questioned whether the System Impact Study ("SIS") submitted for the Project is adequate because it does not examine projected system conditions as of the current June 2010 on-line date. See Data Adequacy Determination at page 72. Second, the Commission has asked for "the expected dates when the preliminary and final interconnection approvals will be received from the Independent System Operator." See Data Adequacy Determination at page 73.

I am writing to provide further information which may assist the Commission in making its data adequacy determination. With respect to the SIS, the study provided to the Commission as part of the Project's Application for Certification ("AFC") is the current SIS. The California Independent System Operator ("CAISO") expects to execute the Large Generator Interconnection Agreement ("LGIA") before the end of this month. Pursuant to Section 12.2.4 of the Large Generator Interconnection Procedures included in the CAISO Tariff, additional studies can be required prior to the in-service date. The CAISO routinely requires an operational study examining the impact of adding the proposed project as of the in-service date; the LGIA for the Project will require such a study.

Southern California Edison has indicated it expects to commence the operational study for the Project roughly sixty days after the LGIA is signed and that it will take roughly sixty days to complete. Consequently, the operational study should be concluded by some time early next year. In short, projected system conditions as of the June 2010 in-service date will be studied prior to interconnection of the Project. Consequently, the CAISO does not believe it would be necessary or appropriate to defer the data adequacy determination pending completion of the study given the delay this could cause to the Project.

With respect to the expected dates of "preliminary and final interconnection approvals," the CAISO provided preliminary approval to the Project on July 5, 2001. Since that date, with the transition to the Large Generation Interconnection Procedure, the CAISO no longer issues preliminary and final

interconnection "approvals." Rather, once an interconnection customer has met the requirements specified in the CAISO tariff, the interconnection customer receives a draft LGIA. The CAISO tendered a draft LGIA for the Project in February of this year. The AFC includes in Appendix H a January 12, 2007 letter from the CAISO. As this letter implies, the project has the approval of the CAISO to interconnect to the grid. The terms upon which interconnection will occur will be specified in the LGIA.

Please let me know if you need further information.

Sincerely,



Judy Nickel  
Project Manager  
California ISO

Cc: Yi Zhang (via email ISO)  
David Le (via email ISO)  
Dennis Peters (via email ISO)

John Tucker (via email SCE)

Bill Kissinger (via email)

**STATE OF CALIFORNIA  
ENERGY RESOURCES  
CONSERVATION AND DEVELOPMENT COMMISSION**

In the Matter of:	)	Docket No. 07-AFC-3
	)	
Application for Certification, for the CPV SENTINEL ENERGY PROJECT	)	<b>ELECTRONIC PROOF OF SERVICE LIST</b>
	)	
	)	(August 14, 2007]
	)	

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Transmission via electronic mail and by depositing one original signed document with FedEx overnight mail delivery service at Costa Mesa, California with delivery fees thereon fully prepaid and addressed to the following:

DOCKET UNIT

**CALIFORNIA ENERGY COMMISSION**  
Attn: DOCKET NO. 07-AFC-3  
1516 Ninth Street, MS-4  
Sacramento, California 95814-5512  
[docket@energy.state.ca.us](mailto:docket@energy.state.ca.us)

Transmission via electronic mail addressed to the following:

APPLICANT

**Mark Turner**  
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55 Second Street, Suite 525  
San Francisco, California 94105  
[mturner@cpv.com](mailto:mturner@cpv.com)

**Dale Shileikis**  
Vice President  
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San Francisco, CA 94105-1917  
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CPV SENTINEL ENERGY PROJECT  
CEC Docket No. 07-AFC-3

**Kathy Rushmore**  
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Kathy\_Rushmore@URSCorp.com

ENERGY COMMISSION

**Bill Pfanner**  
Siting Project Manager  
bpfanner@energy.state.ca.us

**Public Adviser**  
pao@energy.state.ca.us

DECLARATION OF SERVICE

I, Paul Kihm, declare that on August 14, 2007, I deposited a copy of the attached:

**LETTER FROM CALIFORNIA ISO TO CEC RE DATA ADEQUACY DETERMINATION**

with FedEx overnight mail delivery service at Costa Mesa, California with delivery fees thereon fully prepaid and addressed to the California Energy Commission. I further declare that transmission via electronic mail was consistent with the requirements of California Code of Regulations, title 20, sections 1209, 1209.5, and 1210. All electronic copies were sent to all those identified on the Proof of Service List above.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 14, 2007, at Costa Mesa, California.

  
\_\_\_\_\_  
Paul Kihm