January 7, 2010

Risk Services Associates
Shon Greenberg
121 Paul Drive
San Rafel, CA

**RE: Blythe, Genesis, and Palen Solar Projects**

The following information includes responses to your questions identified in your letter dated December 7, 2009.

1. *Please provide the name and location (distance from site) of the two nearest fire stations to each proposed site and the response time from a moment a call is made to arrival on site. Please also provide the number of staff per shift and the type of equipment (vehicles) at these stations.*

The two closest Riverside County Fire stations that would respond to an incident at the proposed Blythe Solar Power Project (BSPP), located approximately eight miles west of the City of Blythe are:

RCO Station # 45, Blythe Air Base, 17280 W HOBSON WAY, Blythe, CA 92225
RCO Station # 44, Ripley, 13987 MAIN ST, Blythe, CA 92225

From the above listed fire stations, the first unit should arrive within 2-3 minutes after dispatch, the second within 11-12 minutes. Riverside County Fire Department Fire Stations are staffed full-time, 24 hours/7 days a week, with a minimum 3 person crew, including Paramedics, operating a “Type-1” structural fire fighting apparatus.

The two closest Riverside County Fire stations that would respond to an incident at the proposed Genesis Solar Energy Project (GSEP), located approximately 25 miles west of the City of Blythe and 27 miles east of Desert Center are:

RCO Station # 45, Blythe Air Base, 17280 W HOBSON WAY, Blythe, CA 92225
RCO Station # 49, Lake Tamarisk, 43880 Lake Tamarisk, Desert Center, CA 92239
From the above listed fire stations, the first unit should arrive within 23 minutes after dispatch, the second within 35 minutes. Riverside County Fire Department Fire Stations are staffed full-time, 24 hours/7 days a week, with a minimum 3 person crew, including Paramedics, operating a “Type-1” structural fire fighting apparatus.

The two closest Riverside County Fire stations that would respond to an incident at the proposed Palen Solar Power Project (PSPP), located off Interstate 10 approximately 10 miles east of Desert Center.

RCO Station # 49, Lake Tamarisk, 43880 Lake Tamarisk, Desert Center, CA 92239
RCO Station # 87, Terra Lago, 42900 Golf Center Parkway, Indio, CA 92201

From the above listed fire stations, the first unit should arrive within 14 minutes after dispatch, the second within 45 minutes. Riverside County Fire Department Fire Stations are staffed full-time, 24 hours/7 days a week, with a minimum 3 person crew, including Paramedics, operating a “Type-1” structural fire fighting apparatus.

2 The applicant for the Genesis project stated that the Chuckwalla Prison fire team would also respond to the GSEP site through a mutual aid agreement they have with the RCFD, and that due to their location they would be the first to arrive on site. Please confirm this information.

The Riverside County Fire Department is the Authority Having Jurisdiction and will provide the primary response to the three project areas.

3 The applicant for the Blythe project stated that the Ehrenberg Fire Dept in Arizona would also respond to the BSPP site through a mutual aid agreement they have with the RCFD. They stated that the Ehrenberg Fire Department has a hazmat response unit that is capable of responding to any incident at the proposed facility and that their response time would be 10 minutes. If possible, please confirm this information.

The Riverside County Fire Department does not have a Mutual Aid Agreement with agencies in the state of Arizona. In addition, Ehrenberg Fire Department does not have a dedicated Hazardous Materials Response Team. The Arizona Department of Transportation handles hazardous materials incidents in the Ehrenberg area. The closest Haz Mat teams are located in Phoenix and Yuma, AZ. The estimated response time to La Paz County, Arizona and the state line is approximately 2 hours. The Riverside County Fire Department is the Authority Having Jurisdiction and will respond to hazardous materials incidents to the three project areas.

4 Please indicate how many firefighters at the RCFD are trained to at least Emergency Medical Technician Level 1 (EMT-1) and how many are trained paramedics. Also indicate how many personnel at the RCFD are trained as first responders to hazardous materials incidents and weather any of the nearby RCFD stations have a Hazardous Materials Response Team. If the RCFD has a local hazmat team, please provide its location and the estimated response times to the three sites. The applicants for these projects indicated that the nearest RCFD hazmat response team is located in Palm Desert and that their response time to these sites would be 1.5-2 hours. Please confirm this information.
Riverside County Fire Department Fire Stations are staffed full-time, 24 hours/7 days a week, with a minimum 3 person crew, including Paramedics, operating “Type-1” structural fire fighting apparatus. Each member of the engine company is a certified Emergency Medical Technician and certified to the level of Hazardous Materials First Responder Operational, (HAZ MAT FRO). In the event of a hazardous materials incident, The Riverside County Fire Department Hazardous Materials Response Team will respond to the three project areas. The estimated response time is approximately 1.5 -2 hours. The Hazardous Materials Response Team is located in the Palm Desert, CA.

Hazardous Materials Response Team # 81
Station # 81, North Bermuda Dunes
37-955 Washington Street
Palm Desert, CA 92211

5 Please indicate which version of the Fire Code is adopted by the RCFD (to my knowledge it is the 2007 California Fire Code) and whether there are other local regulations pertaining to worker safety and fire protection that would apply to these projects.

The County of Riverside has adopted the 2007 California Fire and the 2007 California Building Standards Code in their entirety for regulating and governing the safeguard of life and property from fire and explosion hazards arising from the storage, handling and use of hazards substances, materials and devices from conditions hazardous to life or property in the occupancy of buildings and premises in the County of Riverside, and providing for the issuance of permits and the collection of fees. Riverside County Ordinance No. 787 outlines fire protection standards for the safety, health, and welfare of the citizens of the County.

6 Please indicate whether you feel that the RCFD is adequately staffed and equipped to handle fires and emergencies at these three proposed facilities. Note that some hazardous and flammable materials such as propane and acetylene would be stored at these projects and that heat transfer fluid (which is also flammable) would be contained in the solar arrays. However, these projects would have extensive fire protection systems and other protective measures to minimize the potential for fires and/or spills.

The proposed project will have a cumulative adverse impact on the Fire Department’s ability to provide an acceptable level of service. These impacts include an increased number of emergency and public service calls due to the increased presence of structures, traffic and hazardous storage. In order to analyze the potential HAZ MAT impact to the fire department’s level of service, a complete chemical classification inventory shall be required and submitted to the Planning and Engineering Bureau for review.

7 Please indicate whether you feel that these proposed projects (either individually or cumulatively) would have a negative impact on your ability to serve your jurisdiction.

The proposed project(s) land use would be classified as a Category IV – Outlying. Based on the adopted Riverside County Fire Protection Master Plan, the Category IV – Outlying specifies that a full alarm assignment be operating on the fire ground within thirty minutes from
dispatch and the fire station to be located within 8 miles. The primary stations serving the three project areas would not be within the 8 mile objective. The response times for the three project areas are approximate and currently do not meet the Outlying Land Use Protection Goals.

The California Fire Code outlines fire protection standards for the safety, health, and welfare of the public. These standards will be enforced by the Fire Chief.

If I can be of further assistance, please feel free to contact me at (951) 940-6349 or contact me at jason.neumann@fire.ca.gov

Sincerely,

Jason Neuman, Captain
Strategic Planning Division
Riverside County Fire Department
APPLICATION FOR CERTIFICATION FOR THE
GENESIS SOLAR ENERGY PROJECT

Docket No. 09-AFC-8

PROOF OF SERVICE
(Revised 12/22/09)

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*indicates change
DECLARATION OF SERVICE

I, Maria Santourdjian, declare that on January 12, 2010, I served and filed copies of the attached RCFD Response to RSA for the Genesis Solar Energy Project (09-AFC-8), dated January 7, 2010. The original document, filed with the Docket Unit, is accompanied by a copy of the most recent Proof of Service list, located on the web page for this project at: [http://ww.energy.ca.gov/sitingcases/genesis_solar].

The documents have been sent to both the other parties in this proceeding (as shown on the Proof of Service list) and to the Commission’s Docket Unit, in the following manner:

(Check all that Apply)

FOR SERVICE TO ALL OTHER PARTIES:

x sent electronically to all email addresses on the Proof of Service list;

x by personal delivery or by depositing in the United States mail at Sacramento, California, with first-class postage thereon fully prepaid and addressed as provided on the Proof of Service list above to those addresses NOT marked “email preferred.”

AND

FOR FILING WITH THE ENERGY COMMISSION:

x sending an original paper copy and one electronic copy, mailed and emailed respectively, to the address below (preferred method);

OR

depositing in the mail an original and 12 paper copies, as follows:

CALIFORNIA ENERGY COMMISSION
Attn: Docket No. 09-AFC-8
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512
docket@energy.state.ca.us

I declare under penalty of perjury that the foregoing is true and correct.

Original Signature in Dockets
Maria Santourdjian