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January 18, 2012

California Energy Commission  
Docket Unit  
Attn: Docket No. 09-AFC-09  
1516 Ninth Street, MS-4  
Sacramento, CA 95814-5512

<b>DOCKET</b> 09-AFC-19
DATE <b>JAN 18 2012</b>
RECD. <b>JAN 19 2012</b>

**RE: RIDGECREST SOLAR POWER PROJECT (Docket No. 09-AFC-9)  
Commission Hearing on February 13, 2012**

Dear Honorable Members of the Energy Commission:

The Urban Counties Caucus (UCC), which represents the twelve most populous counties in the state, joins the comments made by the California State Association of Counties (CSAC) in its brief opposing Applicant's Motion for Order Affirming Application of Jurisdictional Waiver for the Ridgecrest Solar Power Project (Docket No. 09-AFC-9).

UCC strongly opposes the request for an order determining that a developer has the ability to ask for the project to be under the Commission's jurisdiction. This would in effect remove the local government's ability to permit the project and would have huge implications on local control for counties. We would also note that photovoltaic facilities are specifically excluded from the Commission's jurisdiction and that this jurisdiction is instead placed in local land use authorities.

Due to the far reaching effects of this order, and the fact that it would impede on a local government's local control over a project, UCC is strongly opposed to this motion and would request that the Energy Commission deny this request.

If you have any questions, please feel free to call me at (916) 327-7531.

Sincerely,

Jolena L. Voorhis  
Executive Director

**Board of Directors:** Chair: Supervisor Liz Kniss, Santa Clara County; Vice Chair: Supervisor Greg Cox, San Diego County Treasurer: Vinod Sharma, Finance Director, Santa Clara County **Members:** Supervisor Keith Carson, Alameda County; Supervisor John Gioia, Contra Costa County; Supervisor Don Knabe, Los Angeles County; Supervisor John Moorlach, Orange County; Supervisor John Benoit, Riverside County; Supervisor Susan Peters, Sacramento County; Supervisor Gary Ovitt, San Bernardino County; Vacant, San Francisco County; Supervisor Carole Groom, San Mateo County; Supervisor Kathy Long, Ventura County



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](http://WWW.ENERGY.CA.GOV)

**APPLICATION FOR CERTIFICATION**  
**For the *RIDGECREST SOLAR POWER PROJECT***

**Docket No. 09-AFC-9**  
**PROOF OF SERVICE**  
*(Revised 12/13/2011)*

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**DECLARATION OF SERVICE**

I, Jolena Voorhis, declare that on January 18, 2012, I served and filed copies of the attached URBAN COUNTIES CAUCUS LETTER OPPOSING MOTION FOR ORDER AFFIRMING APPLICATION OF JURISDICTIONAL WAIVER FOR THE RIDGECREST SOLAR POWER PROJECT, dated January 18, 2012. The original documents filed with the Docket Unit or the Chief Counsel, as required by the applicable regulation, is accompanied by a copy of the most recent Proof of Service list, located on the web page for this project at: [[www.energy.ca.gov/sitingcases/solar\\_millennium\\_ridgecrest/index.html](http://www.energy.ca.gov/sitingcases/solar_millennium_ridgecrest/index.html)].

The document has been sent to other parties in this proceeding (as shown on the Proof of Service list) and to the Commission's Docket Unit or Chief Counsel, as appropriate, in the following manner:

**(Check all that Apply)**

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**AND**

**For filing with the Docket Unit at the Energy Commission:**

- by sending an original paper copy and one electronic copy, mailed with the U.S. Postal Service with first class postage thereon fully prepaid and emailed respectively to the address below (preferred method); OR
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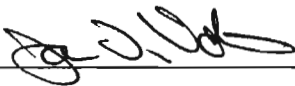
**CALIFORNIA ENERGY COMMISSION - DOCKET UNIT**  
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1516 Ninth Street, MS-4  
Sacramento, CA 95814-5512  
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**OR, if filing a petition for Reconsideration of Decision or Order pursuant to Title 20, Chapter 1720:**

- Served by delivering on this date one electronic copy by e-mail, and an original paper copy to the Chief Counsel at the following address, either personally, or for mailing with the U.S. Postal Service with first class postage thereon fully prepaid:

California Energy Commission  
Michael J. Levy, Chief Counsel  
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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, that I am employed in the county where this mailing occurred, and that I am over the age of 18 years and not a party to the proceeding.

  
\_\_\_\_\_