

ELLISON, SCHNEIDER & HARRIS L.L.P.

CHRISTOPHER T. ELLISON
ANNE J. SCHNEIDER
JEFFERY D. HARRIS
DOUGLAS K. KERNER
ROBERT E. DONLAN
ANDREW B. BROWN
GREGGORY L. WHEATLAND
CHRISTOPHER M. SANDERS
LYNN M. HAUG
PETER J. KIEL

ATTORNEYS AT LAW
2600 CAPITOL AVENUE, SUITE 400
SACRAMENTO, CALIFORNIA 95816-5905
TELEPHONE (916) 447-2166 FAX (916) 447-3512

ELIZABETH P. EWENS, OF COUNSEL
BRIAN S. BIERING
TERESA W. CHAN
SHANE E. CONWAY
JEDEDIAH J. GIBSON
JEREMY D. GOLDBERG
CHASE B. KAPPEL

July 2, 2009

DOCKET
09-RENEW EO-1
DATE <u>July 02 2009</u>
RECD. <u>July 02 2009</u>

Paul Richins
California Energy Commission
Siting, Transmission, and Environmental Protection Division

Scott Flint
California Department of Fish and Game
Habitat Conservation Branch

RE: LSA Comments on June 18th, 2009 Workshop on the Desert Renewable Energy Conservation Plan.

Dear Mr. Richins and Mr. Flint:

Please accept the following comments on behalf of the Large-scale Solar Association (“LSA”) on the June 18th workshop on the Renewable Energy Executive Order (09-Renew-EO-1). LSA appreciated the opportunity to participate in the June 18th Workshop and this opportunity to provide comments on the implementation of the Desert Renewable Energy Conservation Plan (“DRECP”).

LSA believes that California can advance its renewable energy goals and Greenhouse Gas (“GHG”) reduction goals of AB 32, while simultaneously protecting the State’s environmental resources. Environmental stewardship and GHG reduction goals can and should be aligned through policies that recognize an appropriate balance between the two. Both may be achieved through careful and integrated planning.

Meeting the State’s ambitious goals will require not only developing a durable policy framework that provides the certainty needed to develop and finance large-scale solar generating facilities, but also a renewed commitment in the near term to expediting the completion of projects already in the permitting pipeline. To this end, LSA was pleased to hear at the June 18th Workshop that projects that are currently undergoing review will be processed expeditiously while the DRECP is implemented. Further, LSA was pleased to hear that staff anticipates completion of the DRECP during the second quarter of 2012. LSA looks forward to seeing more detailed timelines for the DRECP.

July 2, 2009
Page 2

LSA represents ten of the nation's largest developers and providers of utility-scale solar generating resources. Collectively, LSA's members have contracted to provide over 5 gigawatts ("GW") of clean, sustainable solar power to California's load-serving entities ("LSEs"). Its members develop, own and operate various types of utility-scale solar technologies, including photovoltaic and solar thermal designs. LSA, and its individual member companies, are leaders in the renewable energy industry, advancing solar generation technologies and advocating competitive market structures that facilitate significant integration of renewable energy throughout the western United States. LSA actively represents the interests of utility-scale solar development in California, Arizona, and Nevada, and also works to shape regional and federal policies that affect solar development. Given the breadth of LSA's membership, LSA is uniquely positioned to provide its input on the Renewable Energy Action Team ("REAT") and DRECP processes, and is pleased to be of assistance to the state's efforts on these and other renewable energy and climate protection initiatives

Please consider our letter as a formal request to become a stakeholder participant in the important DRECP process and REAT's other important work. We believe that we can provide insights into the large-scale solar industry that will help advance these important initiatives.

Thank you for your time and consideration.

Sincerely,



Christopher T. Ellison
Brian S. Biering
Ellison, Schneider & Harris L.L.P.
2600 Capitol Avenue, Suite 400
Sacramento, CA 95816-5931
Tel: (916) 447-2166
Fax: (916) 447-3512
Email: bsb@eslawfirm.com

Attorneys for LSA