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LSA
LARGE-SCALE SOLAR ASSOCIATION

October 16, 2009

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

Mr. Scott Flint
California Department of Fish and Game
Habitat Conservation Branch

Re: 09-Renew-EO-01, Draft Best Management Practices Manual, Request For Extension To File Comments

Dear Mr. Richins and Mr. Flint:

The Large-scale Solar Association (LSA) represents ten of the nation's largest developers and providers of utility-scale solar generating resources. Collectively, LSA's members, whose technologies and models span both photovoltaic and solar thermal applications, have contracted to provide over 5 gigawatts ("GW") of clean, sustainable solar power to California's load-serving entities ("LSEs").

LSA appreciates the opportunity, as part of the Renewable Energy Executive Order (09-Renew-EO-1), to help identify solutions to renewable energy siting. LSA deeply appreciates the effort that has gone into the October 5, 2009, draft Best Management Practices (BMP) and Guidance Manual and would like the opportunity to thoroughly comment. However, the diverse perspectives of LSA's companies, and the sheer magnitude of information contained in the BMP document require significant time and study in order to provide meaningful comments. In particular, LSA would like to ensure that its member companies' staff who have particular expertise in siting have enough time to fully review and provide substantive feedback on the Draft BMP.

We therefore respectfully request that you extend the comment deadline to November 20, 2009. In the meantime, we encourage you to not delay your attention to projects that are currently undergoing review and require decisions in the very near future in order to qualify for federal stimulus funds.

Thank you for your understanding and attention in this matter. Please don't hesitate to contact Christine Henning at christine@consciousventuresgroup.com if you have any questions.

Sincerely yours,

/s/
Shannon Eddy
Executive Director
Large-scale Solar Association

cc: Commissioner Douglas
Commissioner Levin
Kevin Hunting
Terry O'Brien