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August 10, 2012

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California Energy Commission

DOCKETED

11-AFC-02

TN # 66549

AUG 10 2012

Mike Monasmith
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Systems Assessment & Facility Siting Division
California Energy Commission
1516 Ninth Street, MS-15
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Subject: Relocation of the Switchyard and Gas Metering Station
Hidden Hills Solar Electric Generating System (11-AFC-2)

Dear Mr. Monasmith:

On behalf of Hidden Hills Solar I, LLC; and Hidden Hills Solar II, LLC, (the Applicant), this letter confirms the Applicant's proposed relocation of the switchyard and gas metering station, since the issue was raised at the July 9, 2012 Status Conference. As explained below, the HHSEGS switchyard and gas metering station are again proposed to be where they were located in the AFC. As proposed in the AFC, the HHSEGS switchyard and the natural gas metering station were located in the northern third of the HHSEGS Common Area. (See HHSEGS AFC, Section 2, Figure 2.1-2, "Site Plan and Linear Facilities," attached).

After the AFC was filed, Phase I reconnaissance-level field studies suggested that the proposed switchyard and metering station might be located in an area characterized by potentially sensitive archeological resources. To avoid impact to such potential resources, the planned location of the switchyard and gas metering station was relocated toward the center of the Common Area in November 2011, as part of Data Response 34 (Data Response Set 1A; see attached Figure DR34-1.)

In April of 2012, as part of the ongoing federal NEPA process for review of the Valley Electric Association's right-of-way grant application, the Bureau of Land Management ("BLM") recommended realignment of the gas and transmission line in Nevada to avoid mesquite thickets and potential cultural resources located in Nevada. The BLM's recommended realignment of the transmission line and the natural gas line corridors in Nevada resulted in a transmission alignment that would require the relocated HHSEGS switchyard and natural gas metering station to again be relocated north of the Common Area in Nevada (see Data Response PD-1, Supplemental Data Response Set 2). The (second) proposed relocation of the switchyard and gas metering station to Nevada is depicted in Figure PD2-1, from Supplemental Data Response Set 3, attached.

In May of 2012, in response to Data Requests 127 and 128, the Applicant completed and submitted the results of a Phase II Evaluative Testing Plan within the HHSEGS site¹. Based on this more detailed investigation, Applicant's expert consultants determined, and CEC staff concurred, that none of the potentially sensitive archeological sites initially identified in the Phase 1 study were, in fact, sensitive resources.² Accordingly, the Applicant proposed moving the switchyard and metering station back to their original locations as shown in the AFC Figure 2.1-2R1, in the northern part of the Common Area. The location of the offsite transmission and gas lines will be determined via the NEPA process.

Consistent with both the AFC (and simulations provided therein) and with the simulations included with the PSA Visual Resources analysis, the currently proposed configuration for the switchyard and gas metering station is the same as initially presented in the AFC. (See AFC Figure 2.1-2R. See also Data Response 35 (Set 1A), and Supplemental Data Response VR-2 (Set 2).)

Please call me if you have any questions.

Sincerely,
CH2M HILL



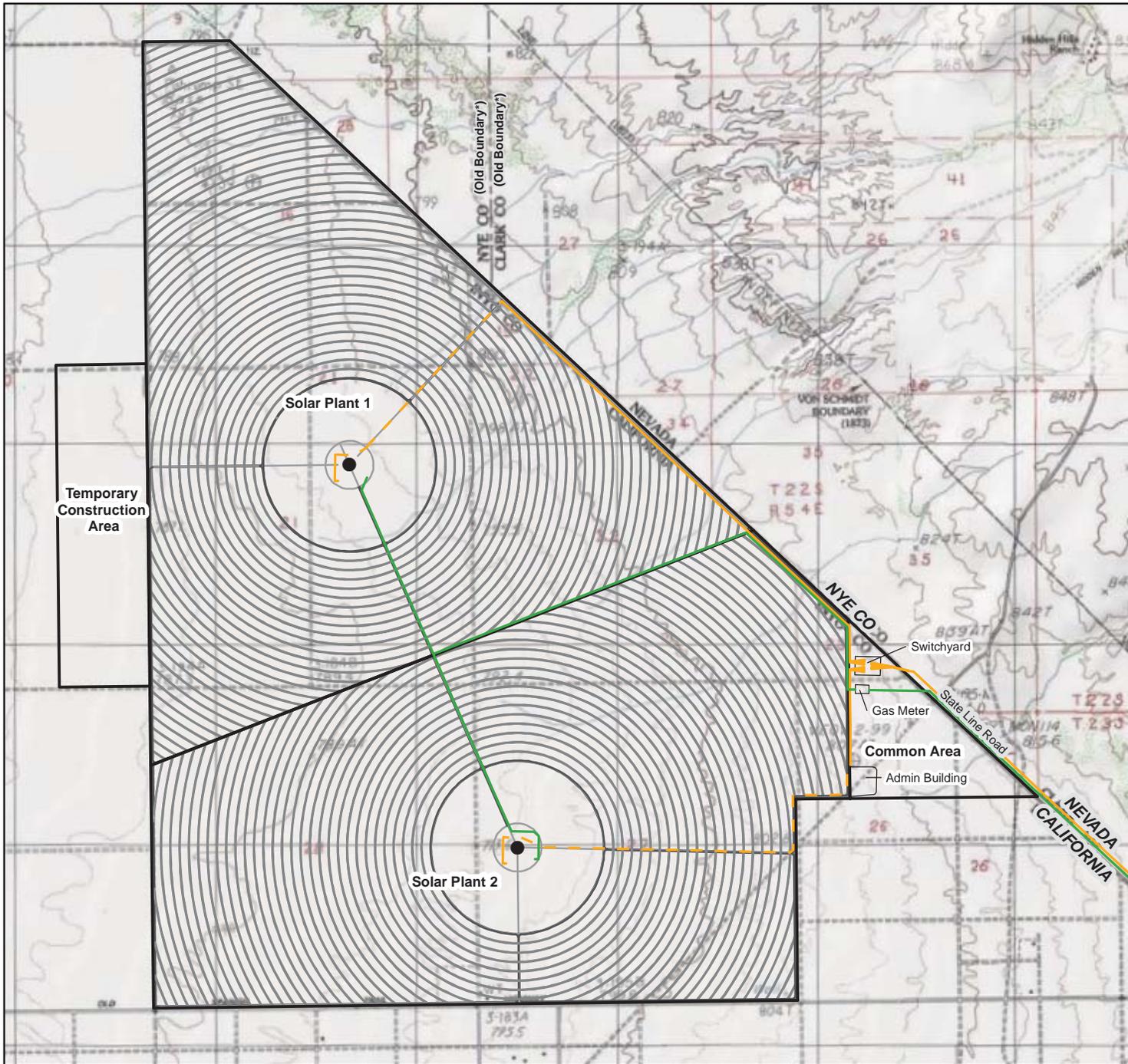
John L. Carrier, J.D.
Program Manager

Encl.

c: POS List
Project file

¹ Data Response Set 1D-6, #128, filed on May 8, 2012.

² Staff confirmed its concurrence with these conclusions at July 2, 2012 Staff workshop on the Supplemental Staff Assessment ("SSA"). In addition, the PSA also includes the following Finding of Fact: "Staff has determined that the archaeological deposits found within the boundaries of the HHSEGS facility site are not significant as individual resources and are not contributors to the Pahrump Metapatch Mesquite Woodland-Coppice Dune Archaeological Landscape. No mitigation is required." (SSA, p. 76.)



- LEGEND**
- Solar Power Towers
 - Proposed Gasline
 - Transmission Line
 - - - Underground Transmission Line
 - Solar Field Heliostat Arrays
 - Access Roads
 - HHSEGS Boundary

*County boundary moved due to annexation, 2001

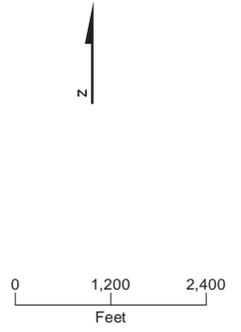
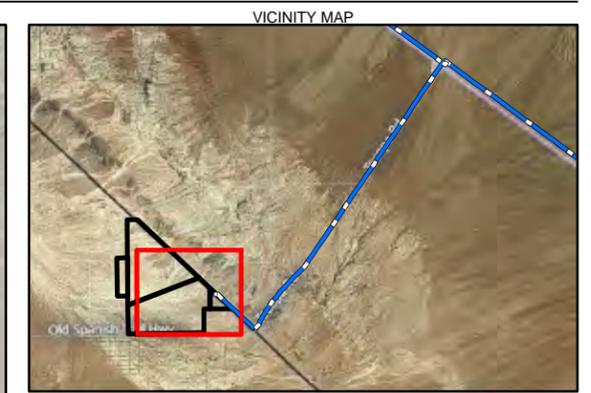
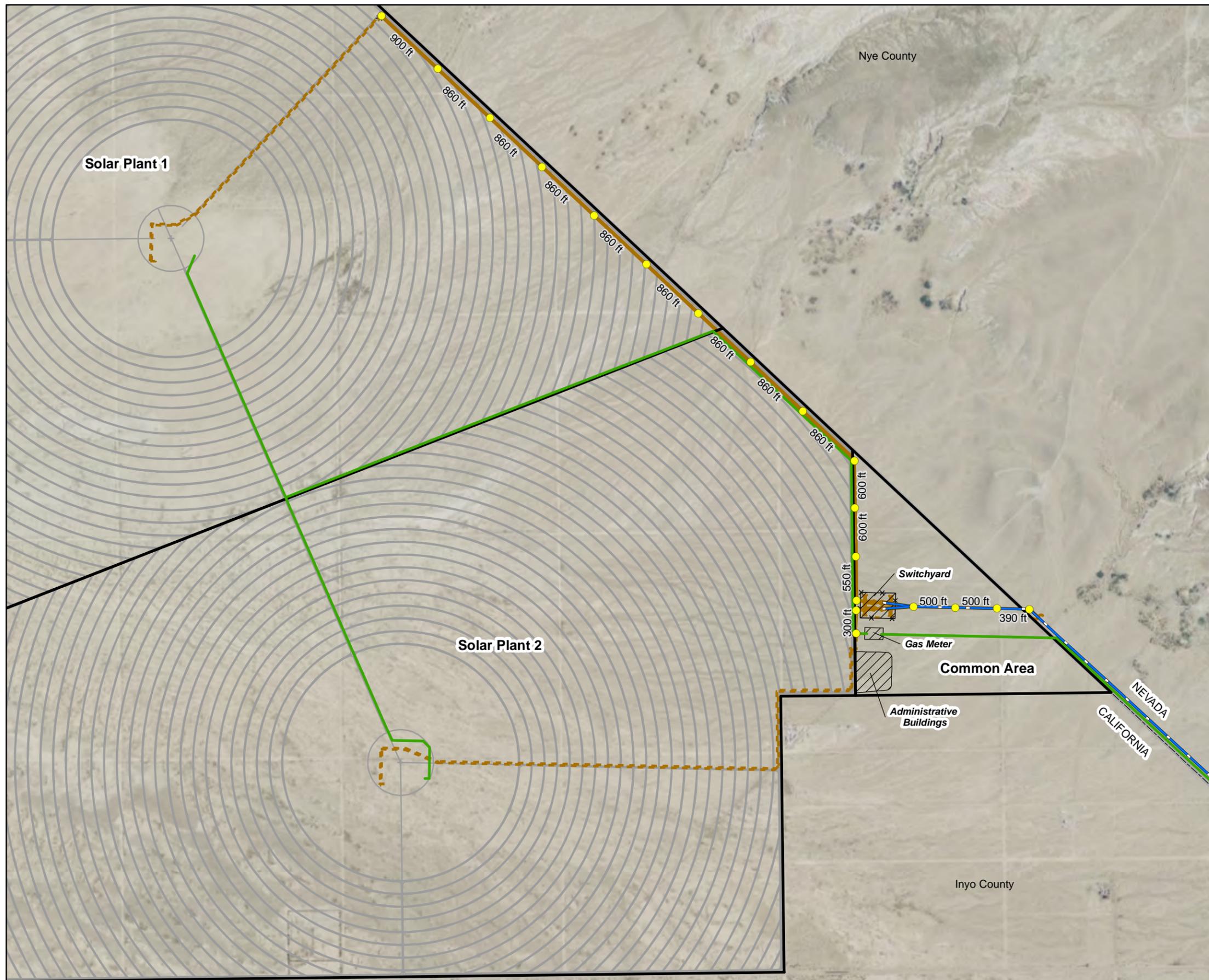


Figure 2.1-2
Site Plan and Linear Facilities
 Hidden Hills Solar Electric Generating System



- LEGEND**
- Transmission Pole
 - Transmission Line Corridor
 - Transmission Line
 - - - Underground Transmission Line
 - Gasline
 - Solar Field Arrays
 - ▨ Site Features
 - ▭ Project Boundary

Note:
Distances should be considered approximate

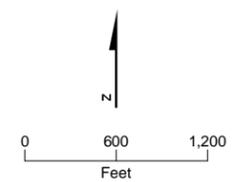
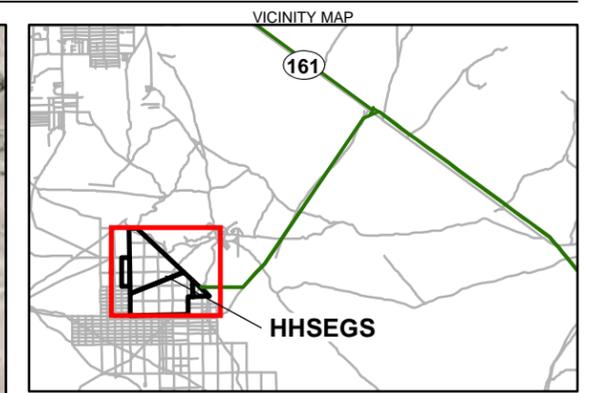
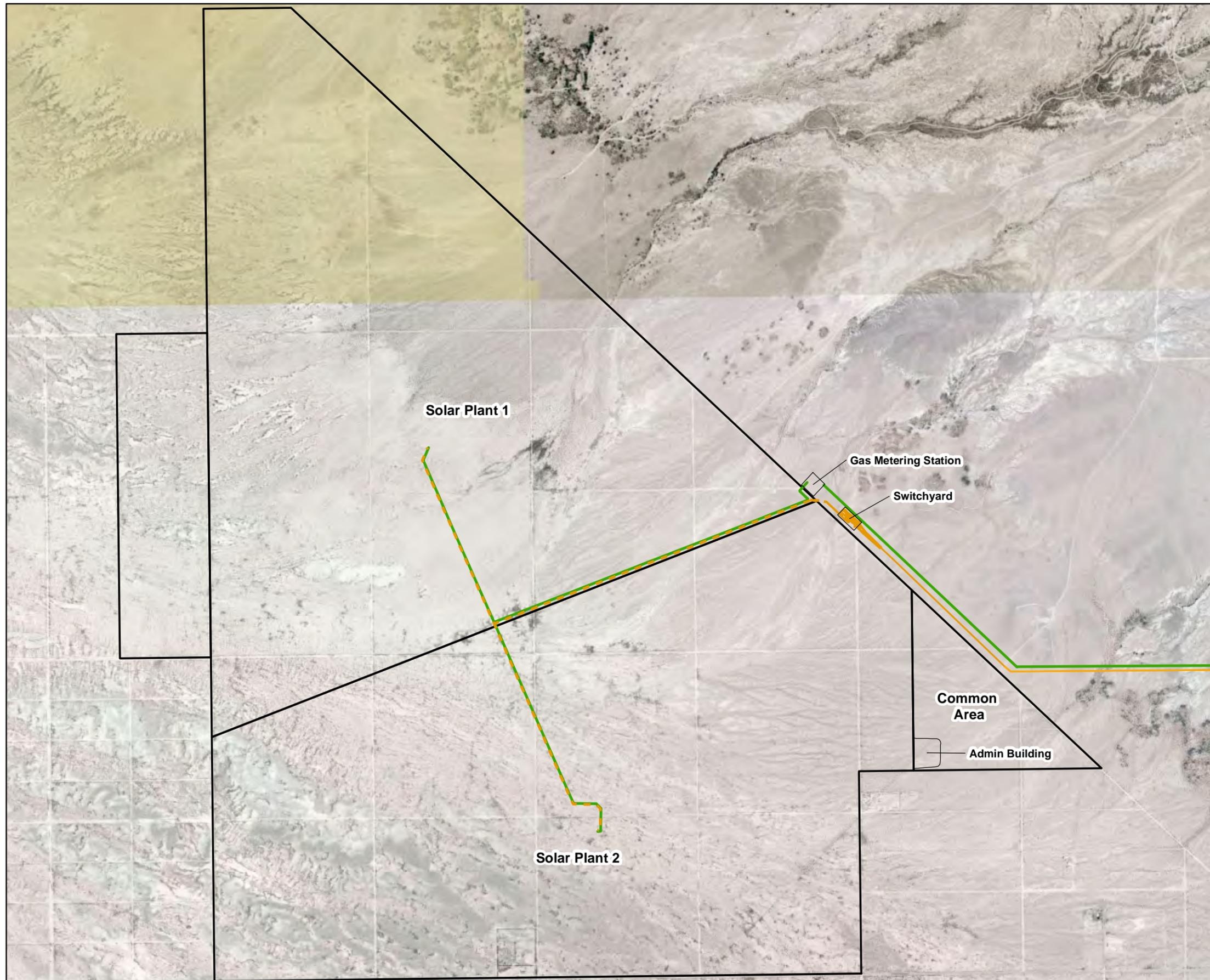


Figure DR34-1
Approximate Transmission Pole Placement
Hidden Hills Solar Electric Generating System



- LEGEND**
- Proposed Gasline
 - Proposed Transmission Line
 - - - Underground Transmission Line
 - HHSEGS

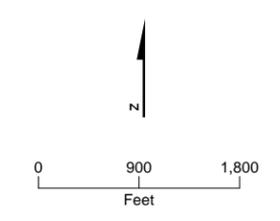
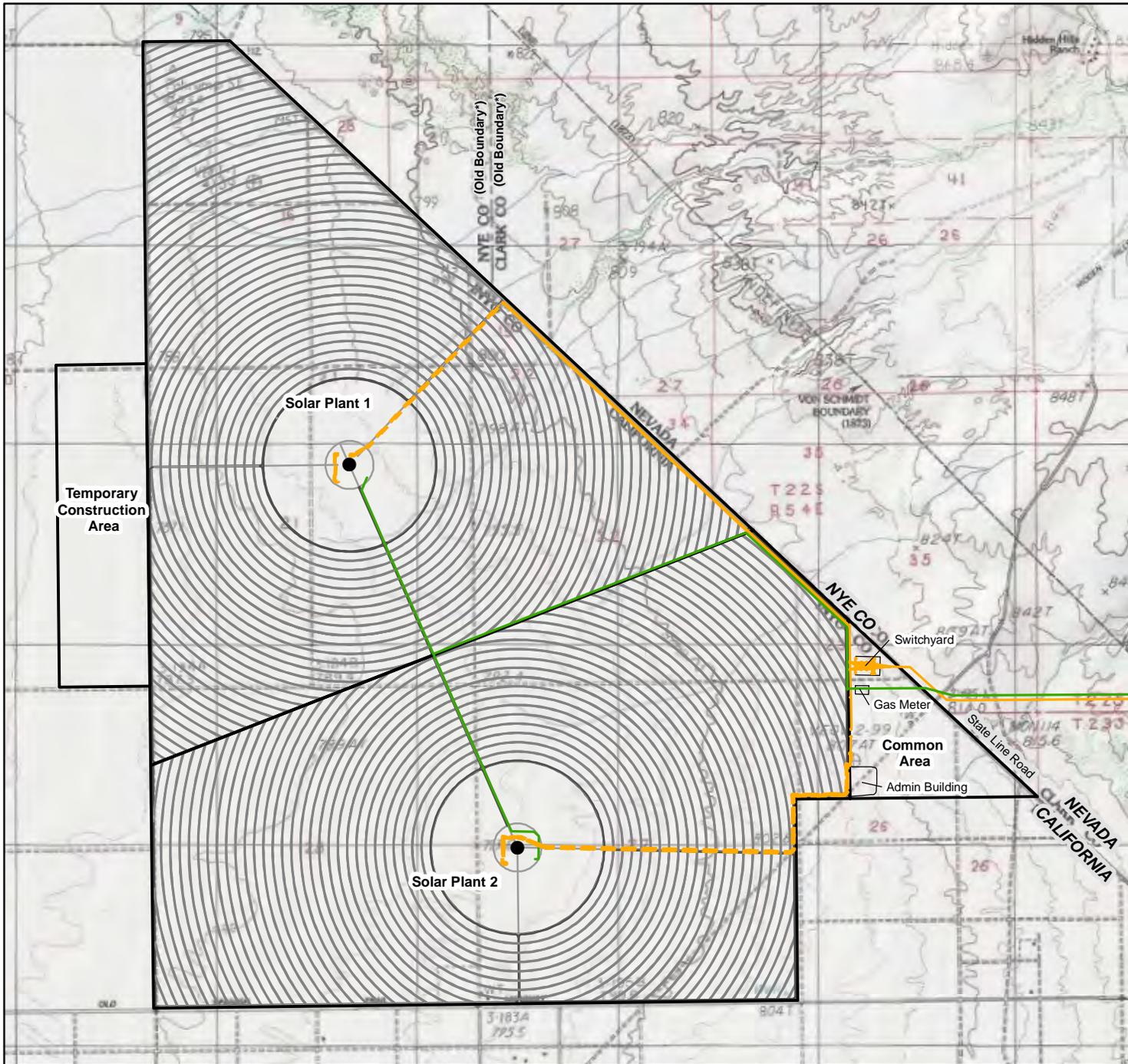


FIGURE PD2-1
Site Plan and Linear Corridors
 Hidden Hills Solar Electric Generating System



- LEGEND**
- Solar Power Towers
 - Proposed Gasline
 - Transmission Line
 - Underground Transmission Line
 - Solar Field Heliostat Arrays
 - Access Roads
 - ▭ HHSEGS Boundary

*County boundary moved due to annexation, 2001

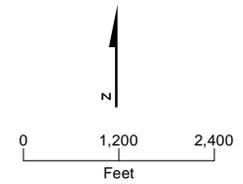


Figure 2.1-2R1
 Site Plan and Linear Facilities
 Hidden Hills Solar Electric Generating System



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

**APPLICATION FOR CERTIFICATION
FOR THE *HIDDEN HILLS SOLAR ELECTRIC
GENERATING SYSTEM***

DOCKET NO. 11-AFC-02
PROOF OF SERVICE
(Revised 6/18/2012)

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DECLARATION OF SERVICE

I, Mary Finn, declare that on August 10, 2012, I served and filed copies of the attached Relocation of the Switchyard and Gas Metering Station Letter, dated August 10, 2012. This document is accompanied by the most recent Proof of Service list, located on the web page for this project at: www.energy.ca.gov/sitingcases/hiddenhills/index.html.

The document has been sent to the 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)

For service to all other parties:

Served electronically to all e-mail addresses on the Proof of Service list;

Served by delivering on this date, either personally, or for mailing with the U.S. Postal Service with first-class postage thereon fully prepaid, to the name and address of the person served, for mailing that same day in the ordinary course of business; that the envelope was sealed and placed for collection and mailing on that date to those addresses **NOT** marked "e-mail preferred."

AND

For filing with the Docket Unit at the Energy Commission:

by sending an electronic copy to the e-mail address below (preferred method); **OR**

by depositing an original and 12 paper copies in the mail with the U.S. Postal Service with first class postage thereon fully prepaid, as follows:

CALIFORNIA ENERGY COMMISSION – DOCKET UNIT
Attn: Docket No. 11-AFC-02
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512
docket@energy.ca.gov

OR, if filing a Petition for Reconsideration of Decision or Order pursuant to Title 20, § 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.



Mary Finn, CH2M Hill