

ADAMS BROADWELL JOSEPH & CARDOZO

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

601 GATEWAY BOULEVARD, SUITE 1000
SOUTH SAN FRANCISCO, CA 94080-7037

TEL: (650) 589-1660
FAX: (650) 589-5062

tgulesserian@adamsbroadwell.com

SACRAMENTO OFFICE

520 CAPITOL MALL, SUITE 350
SACRAMENTO, CA 95814-4715

TEL: (916) 444-6201
FAX: (916) 444-6209

DANIEL L. CARDOZO
THOMAS A. ENSLOW
PAUL F. FOLEY*
TANYA A. GULESSERIAN
MARC D. JOSEPH
RACHAEL E. KOSS
LOULENA A. MILES
GLORIA D. SMITH

OF COUNSEL
THOMAS R. ADAMS
ANN BROADWELL

*Licensed in New York only

February 19, 2009

DOCKET

07-AFC-8

DATE FEB 19 2009

RECD. FEB 19 2009

VIA ELECTRONIC SERVICE

Perry H. Fontana, QEP
Vice President – Projects
Ausra, Inc.
2585 East Bayshore Road
Palo Alto, CA 94303
perry@ausra.com

Re: Carrizo Energy Solar Farm Project (07-AFC-8)
CURE Data Requests, Set Four (No. 108)

Dear Mr. Fontana:

California Unions for Reliable Energy (CURE) submits this fourth data request to Ausra, Inc. for the Carrizo Energy Solar Farm Project pursuant to Title 20, section 1716(b), of the California Code of Regulations. The requested information is necessary to more fully understand the project's visual impacts as set forth in the AFC and as incorporated in the Preliminary Staff Assessment. The requested information is also necessary to assess whether the project will be constructed and operated in compliance with all laws, ordinances, regulations and standards, to assess whether the project will result in significant environmental impacts, to assess whether the project will be constructed and operated in a safe, efficient and reliable manner; and to assess potential mitigation measures.

Pursuant to Section 1716(f) of the Energy Commission's regulations, written responses to these requests are due within 30 days. If you are unable to provide or object to providing the requested information by the due date, you must send a written notice of your objection(s) and/or inability to respond, together with a statement of reasons, to Commissioners Pfannenstiel and Byron and to CURE within 20 days.

2118-041a

February 19, 2009
Page 2

Please contact us if you have any questions. Thank you for your cooperation with these requests.

Sincerely,

/s/

Tanya A. Gulesserian

TAG:bh
Enclosure

cc: Docket (07-AFC-8)
Proof of Service List (07-AFC-8)

**STATE OF CALIFORNIA
California Energy Commission**

In the Matter of:

The Application for Certification
for the CARRIZO ENERGY SOLAR
FARM

Docket No. 07-AFC-08

**CALIFORNIA UNIONS FOR RELIABLE ENERGY
DATA REQUESTS, SET FOUR**

February 19, 2009

Tanya A. Gulesserian
Rachael E. Koss
Marc D. Joseph
Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080
(650) 589-1660 Voice
(650) 589-5062 Facsimile
tgulesserian@adamsbroadwell.com
rkoss@adamsbroadwell.com
mdjoseph@adamsbroadwell.com

Attorneys for the CALIFORNIA
UNIONS FOR RELIABLE ENERGY

The following data requests are submitted by California Unions for Reliable Energy. Please provide your responses via email (if available) by March 23, 2009 to the following people:

Tanya A. Gulesserian
Adams Broadwell Joseph & Cardozo
601 Gateway Blvd., Suite 1000
South San Francisco, CA 94080
(650) 589-1660
tgulesserian@adamsbroadwell.com

Please identify the person who prepared your responses to each data request. If you have any questions concerning the meaning of any data requests, please let us know.

**CARRIZO ENERGY SOLAR FARM
CURE Data Requests Set Four (No. 108)**

VISUAL RESOURCES

Background: VISUAL MODELING

The Application for Certification (“AFC”) contains several simulated views which appear to be inconsistent with other materials published by Ausra on its corporate website.¹ For example, AFC Figure No. 5.13-15, below, does not depict the glare that is apparent in the two figures from Ausra’s website.



Simulated View of CESF From Key Observation Point No. 2, Carrizo Energy Solar Farm (CESF), AFC Figure No. 5.13-15.



Untitled image available on the Ausra website.²

¹ <http://ausra.com>

² <http://www.ausra.com/img/kimberlina00011.jpg>



Untitled image available on the Ausra website.³

In order to determine whether the simulated images provided in the AFC accurately represent the Project's visual impacts, we need to evaluate the Applicant's models and data input files.

³ <http://ausra.com/img/kimberlina04011.jpg>

Data Request

108. Please provide a copy of the data input and output files used to generate the simulated visual observations provided in the AFC.

Dated: February 19, 2009

Respectfully submitted,

/s/

Tanya A. Gulesserian
Adams Broadwell Joseph & Cardozo
601 Gateway Blvd., Suite 1000
South San Francisco, CA 94080
(650) 589-1660 Telephone
(650) 589-5062 Fax
tgulesserian@adamsbroadwell.com
Attorneys for California Unions for Reliable
Energy

PROOF OF SERVICE

I, Bonnie Heeley, declare that on February 19, 2009, I served and filed copies of the attached **CALIFORNIA UNIONS FOR RELIABLE ENERGY DATA REQUESTS, SET FOUR**. The original document, filed with the Docket Unit, is accompanied by a copy of the most recent Proof of Service list. The document has 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:

The documents was also sent electronically to all email addresses on the Proof of Service list and by U.S. Mail at South San Francisco, California, with first-class postage thereon fully prepaid and addressed as provided on the Proof of Service list to those addresses NOT marked “email preferred.” An original paper copy and one electronic copy were mailed and emailed respectively to the Docket Office of the California Energy Commission.

<p>CALIFORNIA ENERGY COMMISSION Attn: Docket No. 07-AFC-8 1516 Ninth Street, MS-4 Sacramento, CA 95814-5512 docket@energy.state.ca.us</p>	<p>Perry H. Fontana, QEP Vice President-Projects Ausra, Inc. 2585 East Bayshore Road Palo Alto, CA 94303 perry@ausra.com</p>
<p>Angela Leiba, GISP Senior Project Manager GIS Manager/Visual Resource Specialist URS Corporation 1615 Murray Canyon Road, Suite 1000 San Diego, CA 92108 Angela_leiba@urscorp.com</p>	<p>Kristen E. Walker, J.D. URS Corporation 1615 Murray Canyon Road, Suite 1000 San Diego, CA 92108 Kristen_e_walker@urscorp.com</p>
<p>Jane E. Luckhardt Downey Brand 621 Capitol Mall, 19th Floor Sacramento, CA 95814 jluckhardt@downeybrand.com</p>	<p>e-recipient@caiso.com (via email only)</p>
<p>Mr. John A. Ruskovich 13084 Soda Lake Road Santa Margarita, CA 93453 agarnett@tcsn.com</p>	<p>Mr. Michael Strobridge 9450 Pronghorn Plains Road Santa Margarita, CA 93453 Mike_76@live.com</p>

<p>California Unions for Reliable Energy c/o Tanya Gulesserian Adams Broadwell Joseph & Cardozo 601 Gateway Boulevard, Suite 1000 South San Francisco, CA 94080 tgulesserian@adamsbroadwell.com</p>	<p>John Burch Traditional Council Lead Salinan Tribe 8315 Morro Road #202 Atascadero, CA 93422 salinantribe@aol.com</p>
<p>Environmental Center of San Luis Obispo c/o Babak Naficy P.O. Box 13728 San Luis Obispo, CA 93406 babaknaficy@sbcglobal.net</p>	<p>Jeffrey D. Byron Commissioner and Associate Member California Energy Commission 1516 Ninth Street Sacramento, CA 95814 jbyron@energy.state.ca.us</p>
<p>Gary Fay Hearing Officer California Energy Commission 1516 Ninth Street Sacramento, CA 95814 Gfay@energy.state.ca.us</p>	<p>John Kessler Project Manager California Energy Commission 1516 Ninth Street Sacramento, CA 95814 jkessler@energy.state.ca.us</p>
<p>Caryn Holmes Staff Counsel California Energy Commission 1516 Ninth Street Sacramento, CA 95814 cholmes@energy.state.ca.us</p>	<p>Michael Doughton Staff Counsel California Energy Commission 1516 Ninth Street Sacramento, CA 95814 mdoughto@energy.state.ca.us</p>
<p>Elena Miller Public Adviser California Energy Commission 1516 Ninth Street Sacramento, CA 95814 publicadviser@energy.state.ca.us</p>	

I declare under penalty of perjury that the foregoing is true and correct. Executed at South San Francisco, CA this 19th day of February, 2009.

_____/s/_____
Bonnie Heeley