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Carrizo Energy Solar Farm (07-AFC-8)
Responses to Comments on the Input Data for Modeling the Wildlife Corridor to Determine Effects and to Consider Mitigation for Species That Would be Impacted by Three Proposed Solar Projects

Background

California Energy Commission staff, California Department of Fish & Game (CDFG), and U.S. Fish & Wildlife Service (USFWS) have identified habitat loss and fragmentation as issues that must be addressed and mitigated by the three solar power projects proposed in the Carrizo Plains study area. These projects include Ausra's Carrizo Energy Solar Field, Optisolar's Topaz Solar Farm, and SunPower's California Valley Solar Ranch. This regional analysis is being conducted by the CEC and its consultant, South Coast Wildlands (SC Wildlands) in cooperation with U.S. Fish and Wildlife Service, CA Department of Fish and Game, San Luis Obispo County, and the applicants. The study will evaluate the habitat and movement needs in an area covering roughly 60 square miles of three focal species consisting of San Joaquin kit fox, pronghorn antelope and tule elk.

On January 27, 2009, the Energy Commission issued a Notice of Comment Opportunity to review the input data for the Wildlife Corridor Study. Comments were received by each of the three applicants as well as from Michael Strobridge. The following responses address comments the Energy Commission received from these parties. Some comments were edited or summarized for clarity.

These responses to comments were developed by SC Wildlands, Energy Commission staff, CDFG staff, and San Luis Obispo County staff.

Comment-1

For what *purpose is a connectivity study needed?*

Response-1

Animals are currently able to move through this area, and there is a need to maintain that connectivity for a variety of reasons. Movement is essential to wildlife survival. Species must move to find food, shelter, or mates. Maintaining connectivity is also important for gene flow and demographic processes (immigration, emigration, rescues, etc.). It also allows individuals and populations to respond to changes in environmental conditions, whether short-term (seasonal, annual) or long-term (climate change). We therefore disagree that only within-home range movements are important. Extra-home range movements don't have to be frequent to be important.

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In environments fragmented by development, disruption of movement patterns can alter essential ecosystem functions, such as predator-prey relationships, gene flow, pollination and seed-dispersal, competitive or mutualistic relationships among species, resistance to invasion by alien species, energy flow, and nutrient cycling. Without the ability to move among and within natural habitats, species become more susceptible to fire, flood, disease and other environmental disturbances, and show greater rates of local extinction (Soulé and Terborgh 1999). The principles of island biogeography (MacArthur and Wilson 1967), models of demographic stochasticity (Shaffer 1981, Soulé 1987), inbreeding depression (Schonewald-Cox 1983; Mills and Smouse 1994), and metapopulation theory (Levins 1970, Taylor 1990, Hanski and Gilpin 1991) all predict that isolated populations are more susceptible to extinction than connected populations. Maintaining connections among natural lands has therefore long been recognized as important for sustaining natural ecological processes and biological diversity (Noss 1987, Harris and Gallagher 1989, Noss 1991, Beier and Loe 1992, Noss 1992, Beier 1993, Forman 1995, Beier and Noss 1998, Crooks and Soulé 1999, Soulé and Terborgh 1999, Crooks et al. 2001, Tewksbury et al. 2002, Forman et al. 2003, Beier et al. 2006).

Comment-2

Specifically, why is a GIS corridor model the appropriate tool to assess impacts of the project, and not a comparative analysis of the existing suitability of lands affected? The ability of habitat remaining in the region to support target species should be addressed.

Response-2

GIS (Geographical Information System) modeling is a comparative analysis. Baseline conditions will be modeled as well as project impacts (individual and cumulative) as well as potential mitigation scenarios.

Whether remaining habitat (before or after project construction) may support the target species depends on spatial characteristics such as the amount of habitat available, the patch sizes of remaining habitat, and the potential for animals to access those patches (connectivity). SC Wildlands' methods address these questions with spatial data from the GIS.

Whether remaining habitat (before or after project's construction) may support a target species is only one of several relevant questions that must be asked in a thorough analysis of a project's impacts. Other questions include whether the project would substantially reduce the habitat of a fish or wildlife species, impose a substantial adverse effect on special status species, or substantially interfere with the movement of native resident or migratory species or with established resident or migratory wildlife corridors.

California Code of Regulations, title 13, section 783.4 requires that applicants fully mitigate the impacts of the permitted take of a state-listed species, including

all impacts on the species that result from any act that would cause the proposed taking. As such, simply determining “the ability of habitat remaining in the region to support target species” is inadequate. Because California lists the San Joaquin kit fox as a threatened species, state law requires all impacts on kit fox must be fully mitigated. Since many of the potential impacts result from the proposed projects’ sizes and locations, which could impact the home ranges of several kit foxes and the potential for kit fox movement through the project area, a spatial model was determined to be the appropriate tool.

Comment-3

No data have been presented to support the idea that regular movement between the Carrizo National Monument and the Palo Prieto Conservation Bank is important to metapopulation viability of the target species for the study (kit fox, tule elk, and pronghorn antelope). These species are not migratory, and do not engage in regular movements out of their home ranges.

Response-3

Migratory species are not the only species that require connectivity. Connectivity is important even if it only facilitates rare or occasional movements out of a home range. It is also important to allow for dispersal of juveniles.

The following passage from the Recovery Plan for Upland Species of the San Joaquin Valley (USFWS 1998) addresses metapopulation viability for the kit fox:

Preliminary population viability analyses suggest that the Carrizo Plain population, the largest remaining, is not viable by itself nor is it viable in combination with populations in western Kern County and the Salinas Valley.

Conserving a number of populations, some much more significant than others because of their large sizes or strategic locations, therefore, will be a necessary foundation for recovery. The areas these populations inhabit need to encompass as much of the environmental variability of the historical range as possible. This will ensure that maximal genetic diversity is conserved in the kit fox metapopulation to respond to varying environmental conditions, and that one environmental event does not negatively impact to the same extent all existing populations. Also, connections need to be established, maintained, and promoted between populations to counteract negative consequences of inbreeding, random catastrophic events (e.g., droughts) and demographic factors.

Given the location of the Palo Prieto Conservation Bank between the kit fox populations in the Salinas-Pajaro Region, the Carrizo Plain and western Kern County, movement of kit fox through the area was judged by USFWS to be important, as stated in the Recovery Plan (USFWS 1998):

Recovery Action a)xiii. Protectand enhance corridors for movement of kit foxes through the Salinas-Pajaro Region and from the Salinas Valley to the Carrizo Plain and San Joaquin Valley.

Comment-4

The *measurement of connectivity should include measures of the movement of individuals.*

Response-4

It is not feasible to measure individual movements and compile enough information to be useful. Studies would have to constantly monitor several individuals for multiple generations. However, the species specialists will assess the model results in relation to their knowledge of each of the species.

Comment-5

Only three focal species were selected for baseline connectivity evaluation. A more comprehensive connectivity plan should include giant kangaroo rats (*Dipodomys ingens*) *and other special status species that are likely to occur in the area*.

Response-5

The focal species selected were chosen to reflect a range of sensitivities to landscape barriers and patterns of habitat usage, while keeping the complexity and difficulty of the corridor modeling to a minimum. The Recovery Plan for Upland Species of the San Joaquin Valley uses the San Joaquin kit fox as an "umbrella" species, representing the habitat needs of several other special status burrowing species, including giant kangaroo rat, blunt-nosed leopard lizard (*Gambelia sila*), and several other burrowing mammals (USFWS 1998).

Comments and Responses on Habitat Rankings

Comment-6

The SCW corridor study looks at the least cost path for a species based on input data that describes ability to move across the landscape, not habitat preference.

Response-6

The SCW study looks at the *least cost corridor* not the least cost path for a species.
Originally experts were instructed to score *habitat suitability* (rather than permeability) of each vegetation class. However, SC Wildlands is consulting with the species experts to determine if any modifications should be made for differences between habitat suitability and permeability rankings.

Comment-7

Habitat preference is the appropriate measure rather than permeability because the species examined do not migrate; rather they move around within the area as appropriate habitat is available.

Response-7

A species does not need to be migratory to require connectivity. In addition, as mentioned above in Responses 3 and 6, the ratings that are used to model the least cost corridor are actually based on habitat suitability.

Comment-8

Ranking agricultural fields for the kit fox should be based on August-September conditions.

Response-8

Using August-Sept conditions to rank agricultural fields for kit fox could be a beneficial refinement. SC Wildlands will discuss this option with our species expert to see if we have sufficient information and data to use this as a parameter for the model.

Comment-9

How were landscape permeability rankings for the kit fox completed?

Response-9

The landscape permeability rankings for kit fox were taken from a previous study that SC Wildlands conducted for the Tehachapi Connection, with the exception of the specific agriculture land cover types. To incorporate additional agricultural lands present in the current study area, SC Wildlands solicited ranking input from a species expert on the following communities: pasture, Cropland, Dryland Grain Crops, Deciduous Orchard, Evergreen Orchard, Irrigated Grain Crops, Irrigated Row and Field Crops, Irrigated Hayfield, Orchard-Vineyard, Rice, and Vineyard. We are working with species experts to confirm that we are using correct rankings for permeability analyses in the Carrizo Study Area, and revised ratings will be provided during the public review process for Task 1.

Comment-10

We would appreciate clarification on the references cited.

Response-10

The citations for elk habitat, CDFG telemetry, and flight data, come directly from the permeability spreadsheet provided by the species experts. The literature cited section of the spreadsheet provided is not exhaustive; the draft report will

cite additional literature. The following corrections to two citations will be noted in future reports:

The citation Yoakum 2004 will be referenced as O'Gara and Yoakum 2004.

The citation Longshore and Lowry 2010, 2011 will be referenced as Longshore and Lowry 2008.

Comments and Responses on Model Executions and Inputs

Comment-11

Data input tables for the model are nearly identical to those in Corridor Designer programs by Majka, D., J. Jenness, and P. Beier (2007).

Response-11

The Corridor Designer Program is based on methods developed by SC Wildlands. See Acknowledgements section at http://www.corridordesign.org/about/. For more information on SC Wildlands methodology, please see Beier et al. 2006, and Beier et al. 2008.

Comment-12

Please provide reclassification data for the model.

Response-12

SC Wildlands is waiting for reviews of the input data and the expert's rankings. Once the model is run under Task 1, the info file for the reclass values will be provided along with screen captures of the actual output rasters (i.e., the input to the model before the weighting is done).

Comment-13

Please provide start and end points in the model.

Response-13

Start and end point selection is critical to the final product of the permeability model. SC Wildlands will be selecting targeted end points based on core areas delineated by the patch size analyses. One of the primary inputs to the patch size analysis is habitat suitability. The habitat suitability models and core areas delineated by the patch size analyses will be evaluated in relation to known population centers based on occurrence data and expert opinion in order to select meaningful endpoints. This process will likely identify various start and end points, which will occur under Task 1.

Comments and Responses on Data Layers

Comment-14

Why is there a difference between the number of habitat types in the model?

Response-14

Habitat specialists were asked to rank all 58 habitat types in the vegetation data layer. However, when the vegetation data layer is clipped to the study area, there are only 34 habitat types within the study area.

Comment-15

Please provide a fence data layer.

Response-15

The GIS staff at the County of San Luis Obispo is currently compiling a fence data layer for use in this wildlife corridor modeling effort. The fence data being prepared by the County will not be used as an input to the permeability model, but will be a consideration in interpretation. If interested in obtaining the fence layer, please contact the County of San Luis Obispo.

Comment-16

It's hard to distinguish between some vegetation types in the model.

Response-16

Some kmz files in Google Earth did not distinctly separate vegetation types with unique colors, but the vegetation units will be clearly delineated in the compiled vegetation layer.

Comment-17

What is the vegetation data based on?

Response-17

SC Wildlands GIS staff compiled a number of vegetation datasets including the vegetation data available on the County of San Luis Obispo website, crop data from San Luis Obispo and Kern counties, and regional vegetation mapping done by the state (i.e., CalVeg). GIS staff evaluated this compiled vegetation layer in relation to recent high-resolution aerial imagery and made changes as necessary. Particular emphasis was placed on agricultural and urban land cover types. For example, land that has been converted to agriculture or urban land uses not in the compiled vegetation data layer were incorporated. Similarly, areas shown as agriculture or urban within the compiled vegetation layer that had not actually been converted to either land use were changed back to the vegetation type in either the CalVeg or County Vegetation data layer.

Comment-18

Field truthing is needed because agriculture is an important variable in the analysis.

Response-18

As noted above, SC Wildlands compiled a vegetation layer from various sources, including agricultural and crop data from San Luis Obispo and Kern counties, then evaluated this layer in relation to recent high-resolution aerial imagery, making changes as necessary. SC Wildlands and the agencies believe the process already conducted to characterize vegetation is adequate.

Comment-19

What is the height of vegetation in the annual grasslands?

Response-19

SC Wildlands is working with experts to determine if incorporating data on precipitation and/or soils would help describe height of vegetation in annual grasslands.

Comment-20

Non-irrigated pasture should be classified as annual grassland for the analyses in the study area.

Response-20

Agreed. Future analyses will classify non-irrigated pasture as annual grassland.

Comments and Responses on Road Calculations

Comment-21

How did you determine what roads were on site?

Response-21

SC Wildlands used 2007 Tiger Line data as for the base roads. This data can be downloaded from the US Census website, http://www.census.gov/geo/www/tiger/. A description of the attributes used in the dataset is located under the documentation section of this site, http://www.census.gov/geo/www/tiger/tgrshp2007/tgrshp2007.html. SC Wildlands added another field to the data, labeled “dirt.” If dirt roads were digitized based on aerial photo interpretation we marked ‘Y’ in that field. All other roads in the dataset were considered paved at the time of the Notice of Comment Opportunity of January 27, 2009. Further communication with CDFG biologists confirms that the majority of roads in the study area are dirt.

Comment-22

How did you determine road density?

Response-22

The road density tool calculates the kilometers of road per square kilometer. Road density will be measured as kilometers of paved road per square kilometer for kit fox and elk. For pronghorn, it will be measured as kilometers of total roads (paved and dirt) per square kilometer.

Comment-23

Can you use species' distance from roads rather than road density?

Response-23

SC Wildlands consulted with species experts for tule elk, pronghorn antelope, and kit fox. Each concurred that road density is a better parameter to use than distance to roads. They concluded that road density is a better indicator of road effects, particularly for the types of roads in the Carrizo region.

Comment-24

What is the probability of road kill, especially considering that Bitterwater Road and State Route 58 each form a barrier to wildlife movement?

Response-24

The road density analysis doesn't differentiate between width and type of road. The landscape permeability analysis does identify the best potential path based on road density, vegetation, elevation, and topography. Potential barriers to movement and recommendations for improving permeability across major paved roads will be addressed in interpreting the results of the analyses.

Additionally, while paved roads are an important factor in tule elk movement they are not absolute barriers to movement. DFG has documented movement of tule elk under at least one major paved road, using a bridge originally designed to facilitate stream flow.

Comments and Responses on Habitat Suitability Tables

Comment-25

Habitat suitability rankings would be very different than permeability rankings.

Response-25

As noted above, experts were instructed to "score *habitat suitability* (rather than permeability) of each vegetation class." Information in the habitat suitability worksheets of the spreadsheet will not be used to change the least cost corridor. SC Wildlands is consulting with the species experts to ensure that the rankings

provided are appropriate for the habitat suitability and patch size analyses. Steps for conducting these analyses will be thoroughly explained in the documentation that accompanies the results of Task 1.

Comment-26

The elevation range for the kit fox is incorrect.

Response-26

The elevation range will be corrected for the Carrizo kit fox population. However, this is irrelevant to the landscape permeability analysis inputs, as the species expert does not consider elevation to be a significant factor in kit fox movement, and gave elevation no weighting in the kit fox model.

Comment-27

What are the data for the pronghorn and tule elk based on?

Response-27

The information provided in the table regarding habitat suitability for pronghorn antelope relies on studies conducted in California, Wyoming, and Montana populations. Much of the information provided is specific to the Carrizo Study Area. SC Wildlands will primarily rely on data from California populations, supplemented by information from Wyoming and Montana as necessary and appropriate.

The information provided in the table regarding habitat suitability for tule elk relies on studies from locations in California and Wyoming. Habitat suitability information will primarily rely on data from the local populations, supplemented by information from other populations as necessary and appropriate.

Comment-28

What will patch sizes for the pronghorn and tule elk be based on?

Response-28

Patch size for elk and pronghorn will be calculated based on known herd range sizes in the Carrizo. Since the focus of this study is wildlife movement, SC Wildlands provided more detail on landscape permeability analyses than the habitat suitability and patch size analyses for this initial round of public review and comment. Steps for conducting the habitat suitability and patch size analyses will be thoroughly explained in the documentation that accompanies the results of Task 1.

Comment-29

What will patch sizes for the kit fox be based on?

Response-29

Home range estimates for kit fox vary from less than one square mile (2.59 km^2) up to approximately twelve square miles (31.08 km^2) (Morrell 1972, Knapp 1978, Zoellick et al. 1987, Spiegel and Bradbury 1992, White and Ralls 1993, USFS 2002). SC Wildlands uses the smallest recorded home range to delineate the lower limit of patch size (2 x 2.59 km^2 or 1280 acres). We use average home range size to delineate core areas. In the Carrizo Plain, home range size averaged 11.6 km^2 (Zoellick et al. 2002). Thus, 11.6 km^2 is equal to 2,866 acres, which is multiplied by 25 to determine potential core area size of 71,650 acres. Patch size would then be defined as greater than or equal to 1280 acres but less than 71,649 acres.

Comments and Responses Regarding Upcoming Analyses

Comment-30

What are the methods for Tasks 2 and 3?

Response-30

The methods for Task 2 will be outlined in detail in the write-up for that task. This information will be available for review during the public review process for Task 2. In general, to quantify impacts of the three proposed solar projects SC Wildlands will evaluate the configuration and extent of each project as proposed in relation to baseline conditions for the selected focal species. This evaluation of project impacts will measure and illustrate impacts to connectivity, and determine each project's proportion of the cumulative impacts. We will provide descriptions of existing and proposed impediments to wildlife movement through the assessment area.

The methodology for Task 3 has not been decided upon because mitigation strategies have not yet been identified. As part of the public review process for Task 2 (Workshop 3), participants in the Carrizo Wildlife Corridor Working Group will have an opportunity to identify potential mitigation strategies and alternative that will be evaluated in Task 3. The methods for Task 3 will be outlined in detail in the write up for that task. This information will be available for review during the public review process for Task 3. In general, for Task 3 SC Wildlands will model proposed mitigation strategies to evaluate their effectiveness to offset habitat loss and fragmentation caused by the proposed solar projects. SC Wildlands will provide a description of alternative mitigation strategies to maintain adequate buffer width and habitat connectivity, with a recommended strategy for conservation action.

Comment-31

Who is on the Science Advisory Board that will review the product?

Response-31

For the purposes of this project, SC Wildlands Science Advisory Panel includes Dr. Paul Beier, Dr. Wayne Spencer, Dr. Esther Rubin, Dr. Brian Cypher, and all wildlife agency biologists participating in this effort.

Comment-32

"Who are the project partners?"

Response-32

At the time the Carrizo Solar Approach document was drafted, the Energy Commission considered the following to be project partners in this effort: U.S. Fish and Wildlife Service, California Department of Fish and Game, County of San Luis Obispo, with desire for the three solar applicants to become partners as well. We now consider all agencies and applicants to be project partners. The final report will address comments relevant to the technical aspects of the analyses and the conclusions of the report.

Regarding San Luis Obispo County and Energy Commission Jurisdiction

Comment-33

Excerpt from Optisolar letter to the Energy Commission dated February 13, 2009:

Topaz and CVSR do not fall under the jurisdiction of the CEC, and are pursuing Conditional Use Permits (CUP) through San Luis Obispo County (the County). It is important for OptiSolar to understand how this study will be utilized by the County to evaluate the Topaz project in the California Environmental Quality Act (CEQA) review process. We therefore request that the County provide, as a part of the SCW study process, a clear framework for how this study and its results will be used in the CEQA review of Topaz and CVSR.

Response-33

Response from John McKenzie, San Luis Obispo County

Both of the PV projects [Topaz and CVSR] are under county jurisdiction and will be going through the EIR process. As a part of the environmental review process, individual and cumulative biological impacts must be addressed in the EIR. As a part of the EIR analysis and in consideration that the county has lead agency status, the county solicits input from responsible and trustee agencies on all environmental issues, including biological resources. Additional deference is given to those agencies that have subsequent permits that are issued through that agency, with the intent that the lead agency document will fulfill that responsible/trustee agency's environmental document needs. As has been clearly stated by CDFG and USFWS, both individual and cumulative impacts could occur to species that have wildlife movement needs. Currently there is inadequate baseline information to determine if these projects individually or

collectively will have a significant impact, nor adequate documentation to identify what areas, if any, are critical to be retained to insure movement of the migratory species. Based on comments from CDFG, the SCW modeling could be an effective means to guide the state and county on what those impacts could be and if there are areas that should be targeted for protection. If a critical corridor falls within project boundaries, we would work with the applicant to make all efforts to revise their project to accommodate such a corridor. On mitigation, we would make it a priority that critical corridor areas be acquired/set aside.

Given that there would be an approximate 600 MW of remaining capacity in the existing transmission line (after these three projects are considered), and that the RETI process is recognizing that a total of 4600 MW of solar power could be expected from the Carrizo Plains, we expect this modeling effort will also help guide future solar projects away from any critically sensitive areas identified in the modeling process.

If this modeling process does not achieve these results, each EIR would need to go through a similar modeling process at an additional cost to each of the applicants. If such a supplemental effort was required, we would be soliciting input from CDFG and USFWS on how to best run the model.

Hopefully that provides sufficient insight on county expectations. If not, please feel free to ask questions.

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Summary of Revisions to Model Input Data in Response to Comments

Revisions to Vegetation Layer:

- All polygons identified as undefined agriculture were reevaluated to try to further define this category (e.g., dryland grain crops, irrigated row and field crops, vineyard, orchard). These updates were then reviewed by CDFG biologists familiar with the area and additional changes were made in an attempt to make the vegetation data layer as accurate as possible.
- Vegetation updates submitted by URS Corporation were evaluated and incorporated as appropriate.
- Possible discrepancies in the vegetation layer noted by SunPower were evaluated. Two out of three of these discrepancies were determined to be a result of incorporating the crop data from San Luis Obispo; the third was determined to be an issue with the color palette of the kmz file.
- All polygons defined as pasture were evaluated to determine if they were irrigated pasture. All non-irrigated pasture polygons were changed to annual grassland. All irrigated pasture polygons remained designated as pasture.
- In order to differentiate between *Avena* and *Bromus* dominated grasslands and get at the height of annual grasslands, we used precipitation data. We downloaded and processed PRISM precipitation data gridded 30 arc-second (800m) annual normals for 1971-2000. We used the 9 inch isocline from precipitation data to further delineate annual grasslands into these two categories, with *Bromus* dominant below 9 inches and *Avena* dominant above 9 inches.

Revisions to Road Layer:

- Based on input from CDFG biologists, the road layer was updated using Caltrans highways and heavy roads to delineate paved roads in the study area. We then evaluated the study area using recent high resolution aerial imagery to identify other paved roads not captured in the Caltrans data. All other roads in the 2007 Tiger Line Data were delineated as dirt roads.
- Road updates submitted by URS Corporation were evaluated and incorporated as appropriate.

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BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT COMMISSION OF THE STATE OF CALIFORNIA
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APPLICATION FOR CERTIFICATION FOR THE *CARRIZO ENERGY SOLAR FARM PROJECT*

Docket No. 07-AFC-8

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DECLARATION OF SERVICE

I, Hilarie Anderson, declare that on March 17, 2009, I served and filed copies of the attached Responses to Comments on the Input Data for Modeling the Wildlife Corridor. The original document, filed with the Docket Unit, is accompanied by a copy of the most recent Proof of Service list, located on the web page for this project at: **[http://www.energy.ca.gov/sitingcases/carrizo/index.html]**. 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:

(C*heck all that Apply*)

For service to all other parties:

_x_ sent electronically to all email addresses on the Proof of Service list;

_x_ by personal delivery or by depositing in the United States mail at Sacramento, California with first-class postage thereon fully prepaid and addressed as provided on the Proof of Service list above to those addresses **NOT** marked "email preferred."

AND

For filing with the Energy Commission:

____sending an original paper copy and one electronic copy, mailed and emailed respectively, to the address below **(preferred method);**

OR

_____depositing in the mail an original and 12 paper copies, as follows:

CALIFORNIA ENERGY COMMISSION
Attn: Docket No. 07-AFC-8
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512

docket@energy.state.ca.us

I declare under penalty of perjury that the foregoing is true and correct.

Original Signature in Dockets
Hilarie Anderson

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