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AZ CORP COMMISSION  
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August 14, 2008

TO: Honorable Commissioner Mike Gleason, Chairman  
Honorable Commissioner Jeff Hatch - Miller  
Honorable Commissioner Kristen Mayes  
Honorable Commissioner Bill Mundell  
Honorable Commissioner Gary Pierce  
Honorable Judge John Foreman  
Brian McNeill, Executive Director

Arizona Corporation Commission  
**DOCKETED**

AUG 18 2008

DOCKETED BY 

SUBJECT: **SOLANA SOLAR GENERATING STATION AND TRANSMISSION- SUPPORT**

Generating Station: Case # 139, Docket: L-00000GG-08-0407-00139  
Transmission Line: Case # 140, Docket: L-00000GG-08-0408-00139  
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For nearly two decades the Sonoran Institute's work has focused on issues related to conservation, smart growth and sustainability in the western United States. Here in Arizona, these issues, set against the backdrop of high population growth and infrastructure needs, are increasingly complex and interconnected.

A confluence of economic, environmental and political forces is reshaping our energy policy like never before. Recognizing the need to take a bold step forward, in 2006 the Corporation Commission passed Renewable Energy Standard rules designed to reduce our reliance on fossil fuels and capitalize on Arizona's natural renewable energy assets – particularly solar.

Today, Arizona is witnessing a wave of new investment in solar technology and infrastructure. Recently, the U.S. Bureau of Land Management responded to a dramatic influx of solar permit applications seeking to locate solar facilities on public lands, by announcing they are embarking on a two year process to develop assessment criteria and create a consistent and sensible new policy framework to evaluate these applications. These criteria will be heavily influenced by environmental considerations, particularly impacts to the land and habitat.

The Solana Solar Generating Station will be the first of its kind in Arizona and, as such, will likely set a standard for those that follow. In short, we believe Solana has set a high standard. Specifically, the following points form the basis for our support:

1. Private Lands - The proposed Solana plant would be built on private lands. While we are not opposed to the location of large generation facilities on public lands once sound criteria have been established, we believe private lands should be the first alternative.
2. Disturbed Lands - The lands chosen for the plant are previously disturbed agricultural lands. Although the process of producing solar energy creates far less environmental disruption than carbon based technologies, the impact to the underlying lands is still severe and long-term. As undisturbed desert land becomes an increasingly scarce and valued commodity, the fact that Solana will not involve the scraping of our precious natural environment is important.

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PROMOTING COMMUNITY DECISIONS THAT RESPECT LAND & PEOPLE OF THE WEST

3. Transmission - While the Solana plant will require some new transmission lines, they will not be in new corridors on sensitive desert lands with adverse impacts to the landscape.
4. Outreach Process - Abengoa's public outreach and stakeholder contact process has been effective and inclusive. We believe it provides a good model for public engagement and the dissemination of information for future applicants as well.

Arizona is poised to reap great economic and environmental benefits from the development of renewable energy resources. The Sonoran Institute stands with the growing body of organizations, citizens and consumers who not only support the development of renewables, but support doing so in a prudent and environmentally sensitive manner. We believe Solana meets that test.

Respectfully,

A handwritten signature in cursive script that reads "Luther Propst".

Luther Propst  
Executive Director  
Sonoran Institute