

Peder Norby, Chairman
San Diego County Planning Commission
5510 Overland Avenue, Suite 110
San Diego, CA 92123

January __, 2014

RE: SOITEC SOLAR OPPOSITION; SOITEC HAS NO POWER PURCHASE AGREEMENTS; THEY ARE NOT COST EFFECTIVE; THEY ARE 'OUT OF THE MONEY'; THEY ARE NOT NEEDED OR WANTED

Dear Chairman Norby,

This letter is written in support of justified opposition by the Boulevard Planning and others to Soitec Solar's projects planned in fire-prone and drought-stressed groundwater dependent neighborhoods.

Soitec's CPV projects are "out of the money" and "out of the market" according to the Independent Evaluator for SDG&E's third amendment to their Power Purchase Agreement with Soitec¹. The DOE's August 2014 peer-review report on the \$25 million grant to Soitec reached similar conclusions. Soitec's CPV projects are not cost effective, not needed, not wanted, and not technologically or economically feasible-despite over \$35 million in federal and state grants, incentives, and unjustified and poorly disclosed fast-tracking under AB900 that selects politically connected favorites as winners.

SDG&E's December 19th media release states that, "Since 2011...SDG&E has taken unprecedented action to work with Soitec, amending contracts, extending milestone deadlines and seeking additional CPUC approvals over the years so that we could bring additional renewable resources into the San Diego community, but Soitec has historically not been able to meet the extended deadlines and other milestones in the contracts. Earlier this year, Soitec assigned their contracts to third-party developers. Therefore, we no longer have a direct business relationship with Soitec."

SDG&E's December 22nd response to Soitec's Dec 5th Application 14-12-008 to amend their dead contract, urged "... the Commission to closely scrutinize the factual claims made by Soitec in the Application in order to ensure the accuracy of the evidentiary record..." SDG&E also noted they had already amended Soitec contracts a total of 24 times². SDG&E's formal statements were produced after, and would appear to negate and undermine, their Soitec support letter, dated December 4th.

Boulevard is not a renewable energy sacrifice zone! The preferred alternative should prioritize / incentivize point-of-use renewable energy generation with battery backup and clean inverters on existing structures and parking lot shade covers. Like the Navy's 20MW deal for 6,000 rooftop solar systems San Diego area homes. Over 44,000 area homes have gone solar with more on the way.³

Soitec's incompatible commercial-industrial scale projects represent unnecessary visual blight, new threats of electrical sparked wildfires, impacts to wildfire fighting tactics, public health and safety impacts, use over 65 million of gallons of precious local groundwater resources during extreme drought conditions, degradation of property values, life time investments, quality of life, and impacts to wildlife-- for a total of over 20 recognized significant and unmitigable impacts. **PLEASE DENY SOITEC'S PROJECTS.**

Douglas R. Kohls

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¹ SDG&E's amended Power Purchase Agreement @ page 7-2, 7-6, 7-10:

<http://regarchive.sdge.com/tm2/pdf/2552-E.pdf>

² <http://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M143/K931/143931998.PDF>

³ <http://www.utsadiego.com/news/2014/nov/17/bright-future-solar-enenergy/3/?#article-copy>



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