



August 4, 2010

Mr. Iain Fisher
CEQA Project Manager
Energy Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102-3296

Re: Tule Wind Project - Response to Data Request No. 9

Dear Mr. Fisher:

Pacific Wind Development, Inc., a wholly owned subsidiary of Iberdrola Renewables, Inc. (IBR) received your Data Request No. 9 regarding the Tule Wind Project. Enclosed is IBR's response.

If you have questions regarding this information, please contact me at 503-796-7781 or Patrick O'Neill at 858-712-8313.

Sincerely,

Jeffrey Durocher
Wind Permitting Manager

cc (via e-mail): Greg Thomsen, BLM (GThomsen@blm.gov)
Thomas Zale, BLM (Thomas_Zale@blm.gov)
Jeffery Childers, BLM (jchilders@blm.gov)
Rica Nitka, Dudek (rnitka@dudek.com)
Patrick O'Neill, HDR Engineering (Patrick.oneill@hdrinc.com)

Enclosures: Material Data Safety Sheets (provided via FTP and subject to agreement regarding confidential treatment); Confidentiality Agreement (attached); Iberdrola Renewable Training Frequency Table (attached).

Fire and Fuels Management

The Fire Protection Plan (FPP) is currently being revised based on meetings held with the fire agencies on July 22, 2010 and July 27, 2010. We anticipate submitting the revised FPP the week of August 16.

1. Please provide the Material Safety Data Sheets for the proposed wind farm. This includes materials that would be potentially stored or used within each turbine and the operations and maintenance building.

Response: Provided to Dudek by FTP are MSDS sheets for 90 products, ranging from cleaners to lubricants, potentially used at a facility. This list is representative of a facility utilizing modern utility scale turbines. Directions to access the MSDS sheets via HDR's FTP site will be sent in an email to the CPUC and Dudek.

2. Please provide the potential types of debris that could fly away from the turbines. Typically, how far does the debris fly from the machine, at what radius?

Response: Under normal operations, no debris is liberated from the turbine. In rare instances when environmental conditions exceed the rating of the turbine, some blade damage can occur and small fiberglass debris may depart from the turbine. Iberdrola Renewables has approximately 49 million operating hours on its U.S. fleet, and in that time, there were no recorded instances of any debris exceeding 150 meters away from the tower centerline. In typical such circumstances, debris falls less than this maximum distance.

3. What is the cause of most turbine fires? Is there industry or proprietary data available to determine the cause of most turbine fires, or mechanical breakdowns that would cause hot debris scatter that could cause ignition?

Response: Iberdrola Renewables is not aware of an industry data base pertaining to the cause of turbine fires. One possible cause of turbine fires includes lightning strikes. Fire risk is minimized by the design and construction of a robust grounding system in each turbine. Another possible cause of fire is arcing of electrical equipment, and fire risk is minimized by designs that comport with applicable codes and decades of operating experience, as well as automatic fire suppression systems as are now proposed at the Tule wind project.

4. How many days a year are considered red flag high fire potential for Santa Ana Wind conditions? CalFire has 10 years of data, and is willing to provide these statistics to the County and the CPUC. Typically, it could be three to five occurrences for a period of 72 to 96-hour periods per year. Would Iberdrola Renewables be willing to shutdown during these high-risk fire conditions?

Response: Turbine shutdown is not required during red flag warnings and would not reduce fire risk. Iberdrola Renewables is consulting with the fire agencies to enhance the FPP such that it will meet their approval. During red flag warnings, the fire agencies recommend that hot work be prohibited, and Iberdrola Renewables has agreed to implement this measure. Hot work includes activities involving cutting, welding, thermal welding, brazing, soldering, grinding, thermal spraying, thawing pipe, installation of torch applied roof systems or any other similar activity. Iberdrola Renewables has also agreed to install automatic fire suppression systems in the turbines if compatible with the turbine without voiding the turbine warranty. These measures will be incorporated into a revised FPP.

5. Please provide manufacture safety data from your potential turbine manufacturers: Vestas, Siemens, G.E., Acciona, and Mitsubishi.

Response: The material to be provided to the CPUC in response to this request is to be treated as confidential trade secret information that is not to be disclosed to any third party, and is exempt from disclosure pursuant to Public Resources Code § 21160; Government Code §§ 6254.7, 6254.15; 14 Cal. Code Regs. § 15120(d). Directions to access HDR's FTP site will be sent in an email to the CPUC and Dudek once the attached confidentiality agreement has been executed among the parties.

The information to be provided to Dudek by FTP is the safety material that could be obtained in the timeframe of this request. The material to be provided relates to turbines manufactured by Suzlon, General Electric and Gamesa are all representative of modern utility scale turbines. The Gamesa materials do not include discussion of a smoke alarm that is also part of its safety system. If the smoke alarm ("Alarm 309") trips, the turbine to go into an emergency condition, which in turn would open the switchgear and disconnect the turbine from the grid.

6. What safety training has Iberdrola provided for wind developments they have completed? Please provide information on the training materials, videos, programs used by Iberdrola.

Response: All of Iberdrola Renewable's wind technicians receive comprehensive safety training consisting of classroom and field instruction. All technicians received Occupational Health and Safety Administration and Environmental Protection Agency required training. New technicians must complete training within 1 year. Attached hereto is a training frequency table showing that training is refreshed on a 1, 2 or 3-year cycle, as applicable.

7. Please confirm the date and location of the tour of an existing Southern California Iberdrola Wind Farm with CalFire Officials.

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Response: IBR has scheduled a facility tour of Dillon Wind Farm on Thursday, August 12 at 9 AM. The wind farm is located in Palm Springs. This is IBR's nearest wind farm to San Diego.

The Dillon Wind Farm is a 45 MW project. The wind farm has 45 Mitsubishi 1.0 MW turbines. Attendees will be able to tour the Operations and Maintenance building, where attendees can observe how IBR monitors each wind turbine with the SCADA system. Attendees will also be able to drive around the property and walk up to the turbines and look inside the tower.

Wind Ops 2010 EHS Training Matrix

EHS Training Requirements	EHS Manual Section #																																										
	Avian/Bat Program	Enclosed Space	CPR/First Aid/Bloodborne Pathogens	DOT	DOT Compliance Policy	Electrical Safety - QEW *	Electrical Safety - non-QEW *	Emergency Response Plan	Ergonomics	Excavation	Fall Protection/Turbine Rescue Refresher	Fire Extinguisher Use	Fire Prevention	Forklift/Powered industrial Devices	Hazard Comm and Chem Mgmt	Hearing Conservation	Hoisting and Rigging	HotWork	Incident Investigation and Reporting	JSA	Lockout/Tagout	Bucket Truck (Penescal only)	NERC Sabotage and General Requirements	PPE	Radio Communications	Respiratory Voluntary Program	Safety Meeting/Committee	SPCC & Spill Reporting	Temperature Extremes	EOS Driving/Vehicle Safety	Winter Driving Video	Waste Management	Work Control	Safety is in our hands Video	Heat Stress	Charlie Morecraft Video	Fit For Duty	Contractor Safety Indoctrination Procedure					
Trainer	002	005	003	006	032	028Q	028N	007	027	010	009R	008	012	011	029	013	014	015	017	4.2	016	018	019	020	021	022	031	023	024	026	034	034W	004	035	036	039	040	041	042				
Jerry Roppe																																											
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3rd Party																																											
Gen Phys EN0301, 0302, 0303																																											
Plant Personnel	1	1	3	1	1	1	1	1		3	1	1	3	3	1	1	3	3	2	2	1	1	1	3		2	1	3	1	1	1	1	1	1	3	1	3	2	2				
Kyle Layman																																											
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Plant Personnel																																											
Gen Phys OS10																																											
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Schmuck/Plant Trainers																																											
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