

From: Thakar, Nidhi (Perkins Coie

Sent: 2/4/2013 4:07:54 PM

liddell@energyattorney.com (liddell@energyattorney.com);
tdarton@pilotpowergroup.com (tdarton@pilotpowergroup.com);
lwisland@ucsusa.org (lwisland@ucsusa.org); matthew@turn.org
(matthew@turn.org); jleslie@mckennalong.com (jleslie@mckennalong.com);
whitney@clean-coalition.org (whitney@clean-coalition.org);
mike_windpower@yahoo.com (mike_windpower@yahoo.com);
AKaplan@BrownRudnick.com (AKaplan@BrownRudnick.com);
ehsieh@a123systems.com (ehsieh@a123systems.com); cathy.karlstad@sce.com
(cathy.karlstad@sce.com); rick_noger@praxair.com (rick_noger@praxair.com);
douglass@energyattorney.com (douglass@energyattorney.com);
igoodman@commerceenergy.com (igoodman@commerceenergy.com);
adam.green@solarreserve.com (adam.green@solarreserve.com);
gbass@noblesolutions.com (gbass@noblesolutions.com); cpacc@calpine.com
(cpacc@calpine.com); rkmoore@gswater.com (rkmoore@gswater.com);
info@3PhasesRenewables.com (info@3PhasesRenewables.com);
KSEngineers@aol.com (KSEngineers@aol.com); MbeLively@aol.com
(MbeLively@aol.com); karlk@dietzedavis.com (karlk@dietzedavis.com);
lflowers111@gmail.com (lflowers111@gmail.com);
To: kim.johnson@RiverbankPower.com (kim.johnson@RiverbankPower.com);
katherine.krause@DirectEnergy.com (katherine.krause@DirectEnergy.com);
Joseph.williams@cwt.com (Joseph.williams@cwt.com); ssmyers@att.net
(ssmyers@att.net); nes@a-klaw.com (nes@a-klaw.com); mtierney-
lloyd@enernoc.com (mtierney-lloyd@enernoc.com); bcragg@goodinmacbride.com
(bcragg@goodinmacbride.com); kelly@votesolar.org (kelly@votesolar.org);
gmorris@emf.net (gmorris@emf.net); GloriaB@anzaelectric.org
(GloriaB@anzaelectric.org); Huffman, Mark (Law)
(/O=PG&E/OU=Corporate/cn=Recipients/cn=MRH2);
andrea.morrison@directenergy.com (andrea.morrison@directenergy.com);
abb@eslawfirm.com (abb@eslawfirm.com); tomb@crossborderenergy.com
(tomb@crossborderenergy.com); dorth@krcd.org (dorth@krcd.org);
barmackm@calpine.com (barmackm@calpine.com); VidhyaPrabhakaran@dwt.com
(VidhyaPrabhakaran@dwt.com); bmarshall@psrec.coop (bmarshall@psrec.coop);
dansvec@hdo.net (dansvec@hdo.net); wrostov@earthjustice.org
(wrostov@earthjustice.org); jack@casaraquel.com (jack@casaraquel.com);
njohnson@consumercal.org (njohnson@consumercal.org); Reid, Alice L (Law)
(/O=PG&E/OU=Corporate/cn=Recipients/cn=ALR4); ames_doug@yahoo.com
(ames_doug@yahoo.com); mehta.associates@ymail.com
(mehta.associates@ymail.com); knakatani@calhrc.org (knakatani@calhrc.org);
ATrial@SempraUtilities.com (ATrial@SempraUtilities.com); gotschall@ti-sd.com
(gotschall@ti-sd.com); dkates@sonic.net (dkates@sonic.net); toconnor@edf.org
(toconnor@edf.org); proceedings@megawattsf.com
(proceedings@megawattsf.com); anfanzon@semprautilities.com
(anfanzon@semprautilities.com); andra.pligavko@gmail.com

(andra.pligavko@gmail.com); JWaen@MarinEnergy.com
(JWaen@MarinEnergy.com); bgross@caiso.com (bgross@caiso.com);
RegRelCPUCCases
(/O=PG&E/OU=Corporate/cn=Recipients/cn=RegRelCPUCCases);
clamasbabbini@comverge.com (clamasbabbini@comverge.com);
david@nemtzw.com (david@nemtzw.com); tam@communityrenewables.biz
(tam@communityrenewables.biz); sephra.ninow@energycenter.org
(sephra.ninow@energycenter.org); case.admin@sce.com (case.admin@sce.com);
mrw@mrwassoc.com (mrw@mrwassoc.com); DWTCPUCCASES@dwt.com
(DWTCPUCCASES@dwt.com); blaising@braunlegal.com
(blaising@braunlegal.com); klatt@energyattorney.com (klatt@energyattorney.com);
JanMcFar@sonic.net (JanMcFar@sonic.net); spauker@wsgr.com
(spauker@wsgr.com); Erin.Grizard@BloomEnergy.com
(Erin.Grizard@BloomEnergy.com); ttutt@smud.org (ttutt@smud.org);
Diane.Fellman@nrgenergy.com (Diane.Fellman@nrgenergy.com);
californiadockets@pacificorp.com (californiadockets@pacificorp.com);
sean.beatty@genon.com (sean.beatty@genon.com); lwhouse@innercite.com
(lwhouse@innercite.com); michelle.d.grant@dynegey.com
(michelle.d.grant@dynegey.com); steven.huhman@morganstanley.com
(steven.huhman@morganstanley.com); cpuc@primuspowers.com
(cpuc@primuspowers.com); akbar.jazayeri@sce.com (akbar.jazayeri@sce.com);
amber.wyatt@sce.com (amber.wyatt@sce.com); klr@a-klaw.com (klr@a-
klaw.com); nellie.tong@dnvkema.com (nellie.tong@dnvkema.com);
pcarson@energycentral.com (pcarson@energycentral.com);
Capp@GridStorageConsulting.com (Capp@GridStorageConsulting.com);
jbryan@codaenergy.com (jbryan@codaenergy.com); mdetsky@dietzedavis.com
(mdetsky@dietzedavis.com); n.davidson@renewableanalytics.com
(n.davidson@renewableanalytics.com); ddivine@eaglecrestenergy.com
(ddivine@eaglecrestenergy.com); tandrews@calmac.com (tandrews@calmac.com);
Richard.S.Flood@jci.com (Richard.S.Flood@jci.com);
janderson@viridityenergy.com (janderson@viridityenergy.com);
usappk@gmail.com (usappk@gmail.com); AKaplan@BrownRudnick.com
(AKaplan@BrownRudnick.com); jspilman@gridflexenergy.com
(jspilman@gridflexenergy.com); AAmirali@starwood.com
(AAmirali@starwood.com); SLowe@EagleCrestEnergy.com
(SLowe@EagleCrestEnergy.com); Nancy.Allred@sce.com
(Nancy.Allred@sce.com); skincaid@makerscapital.com
(skincaid@makerscapital.com); dadams@viridityenergy.com
(dadams@viridityenergy.com); JJudson-mcqueeney@ces-ltd.com (JJudson-
mcqueeney@ces-ltd.com); yu@beaconpower.com (yu@beaconpower.com);
NODonovan@LREnergy.com (NODonovan@LREnergy.com);
rfo@sovereignenergy.net (rfo@sovereignenergy.net); rokeefe@xtremepower.com
(rokeefe@xtremepower.com); sdavis@kngrid.com (sdavis@kngrid.com);
michael.stelts@panasonic.com (michael.stelts@panasonic.com);
abrown@xtremepower.com (abrown@xtremepower.com); sahm@clean-
coalition.org (sahm@clean-coalition.org);

margaret.miller@brookfieldrenewable.com
(margaret.miller@brookfieldrenewable.com); CSummers@SempraUtilities.com
(CSummers@SempraUtilities.com); Berlinski@BeaconPower.com
(Berlinski@BeaconPower.com); jLin@strategen.com (jLin@strategen.com);
rspolek@besciences.com (rspolek@besciences.com); TJS@cyp-res.com (TJS@cyp-
res.com); steve.eckert@BrookfieldPower.com
(steve.eckert@BrookfieldPower.com); msloustcher@codaelectric.com
(msloustcher@codaelectric.com); WJKeese@aol.com (WJKeese@aol.com);
dyana@clean-coalition.org (dyana@clean-coalition.org); csullivan@zbbenergy.com
(csullivan@zbbenergy.com); pdarcy@sna.sanyo.com (pdarcy@sna.sanyo.com);
tory.lauterbach@cwt.com (tory.lauterbach@cwt.com); Cherry, Brian K
(/O=PG&E/OU=CORPORATE/CN=RECIPIENTS/CN=BKC7); Haertle, Steve
(/O=PG&E/OU=CORPORATE/CN=RECIPIENTS/CN=SRH1);
lmh@eslawfirm.com (lmh@eslawfirm.com); joyw@mid.org (joyw@mid.org);
jeanne.sole@sfgov.org (jeanne.sole@sfgov.org); eric@ethree.com
(eric@ethree.com); filings@a-klaw.com (filings@a-klaw.com);
CentralFiles@SempraUtilities.com (CentralFiles@SempraUtilities.com); Cotroneo,
Eileen (/O=PG&E/OU=Corporate/cn=Recipients/cn=EFM2); cem@newsdata.com
(cem@newsdata.com); e-recipient@caiso.com (e-recipient@caiso.com);
jim.metropulos@sierraclub.org (jim.metropulos@sierraclub.org); Gonzales,
Matthew (/O=PG&E/OU=Corporate/cn=Recipients/cn=MRGg); Pagedar, Sujata
(/O=PG&E/OU=Corporate/cn=Recipients/cn=sxpg);
mdjoseph@adamsbroadwell.com (mdjoseph@adamsbroadwell.com);
rl@eslawfirm.com (rl@eslawfirm.com); sue.mara@RTOadvisors.com
(sue.mara@RTOadvisors.com); kowalewskia@calpine.com
(kowalewskia@calpine.com); andykatz@sonic.net (andykatz@sonic.net);
steven@iepa.com (steven@iepa.com); dgrandy@caonsitegen.com
(dgrandy@caonsitegen.com); atrowbridge@daycartermurphy.com
(atrowbridge@daycartermurphy.com); juliettea7@aol.com (juliettea7@aol.com);
ek@a-klaw.com (ek@a-klaw.com); amber@iepa.com (amber@iepa.com);
sberlin@mccarthyllaw.com (sberlin@mccarthyllaw.com); ehadley@reupower.com
(ehadley@reupower.com); kdw@woodruff-expert-services.com (kdw@woodruff-
expert-services.com); Monica.Schwebs@bingham.com
(Monica.Schwebs@bingham.com); HRasool@SempraUtilities.com
(HRasool@SempraUtilities.com); marcie.milner@shell.com
(marcie.milner@shell.com); mary.wiencke@pacificorp.com
(mary.wiencke@pacificorp.com); rvn@a-klaw.com (rvn@a-klaw.com);
chris@emeter.com (chris@emeter.com); brian.theaker@nrgenergy.com
(brian.theaker@nrgenergy.com); bmcc@mccarthyllaw.com
(bmcc@mccarthyllaw.com); tcr@cpuc.ca.gov (tcr@cpuc.ca.gov); dbp@cpuc.ca.gov
(dbp@cpuc.ca.gov); david@ceert.org (david@ceert.org); jbaird@earthjustice.org
(jbaird@earthjustice.org); dbehles@ggu.edu (dbehles@ggu.edu);
acsmith@stoel.com (acsmith@stoel.com); clu@cpuc.ca.gov (clu@cpuc.ca.gov);
kwh@cpuc.ca.gov (kwh@cpuc.ca.gov); crv@cpuc.ca.gov (crv@cpuc.ca.gov);
rl4@cpuc.ca.gov (rl4@cpuc.ca.gov); aol@cpuc.ca.gov (aol@cpuc.ca.gov);
JMauldin@adamsbroadwell.com (JMauldin@adamsbroadwell.com);

matt.vespa@SierraClub.org (matt.vespa@SierraClub.org); TLindl@kfwlaw.com (TLindl@kfwlaw.com); dchia@solarcity.com (dchia@solarcity.com); cpuc@libertyutilities.com (cpuc@libertyutilities.com); Patwa, Daidipya (/O=PG&E/OU=Corporate/cn=Recipients/cn=D2PA); wtr@cpuc.ca.gov (wtr@cpuc.ca.gov); kar@cpuc.ca.gov (kar@cpuc.ca.gov); jderosa@ces-ltd.com (jderosa@ces-ltd.com); ayk@cpuc.ca.gov (ayk@cpuc.ca.gov); dsc@cpuc.ca.gov (dsc@cpuc.ca.gov); jls@cpuc.ca.gov (jls@cpuc.ca.gov); TRH@cpuc.ca.gov (TRH@cpuc.ca.gov); Fukui, Lucy (/O=PG&E/OU=Corporate/cn=Recipients/cn=L GK2); mary.hemmingsen@brookfieldpower.com (mary.hemmingsen@brookfieldpower.com); shears@ceert.org (shears@ceert.org); sreineccius@gmail.com (sreineccius@gmail.com); BAdams@EnerVault.com (BAdams@EnerVault.com); francis.taylor@enersys.com (francis.taylor@enersys.com); Smith, Christopher (/O=PG&E/OU=Corporate/cn=Recipients/cn=C5SE); nate.sandvig@enxco.com (nate.sandvig@enxco.com); waltnerlaw@gmail.com (waltnerlaw@gmail.com); f.schubert@renewableanalytics.com (f.schubert@renewableanalytics.com); cecilia.aguillon@kyocera.com (cecilia.aguillon@kyocera.com); dan.patry@recurrentenergy.com (dan.patry@recurrentenergy.com); LManz@viridityenergy.com (LManz@viridityenergy.com); aviramontes@lbl.gov (aviramontes@lbl.gov); Doug.Hackley@Calenergy.com (Doug.Hackley@Calenergy.com); shaun.logue@brookfieldrenewable.com (shaun.logue@brookfieldrenewable.com); irene@igc.org (irene@igc.org); ericg@votesolar.org (ericg@votesolar.org); Jim.Hicks@state.or.us (Jim.Hicks@state.or.us); paul.stith@greenonramp.com (paul.stith@greenonramp.com); yaron@voltmetrix.com (yaron@voltmetrix.com); cpuc-r1012007@olivineinc.com (cpuc-r1012007@olivineinc.com); aadeyeye@earthjustice.org (aadeyeye@earthjustice.org); dhawkins3@mac.com (dhawkins3@mac.com); whholmes@stoel.com (whholmes@stoel.com); art@ucan.org (art@ucan.org); kevin.snyder@hdrinc.com (kevin.snyder@hdrinc.com); afreifeld@viridityenergy.com (afreifeld@viridityenergy.com); pklauder@caiso.com (pklauder@caiso.com); martinc@mid.org (martinc@mid.org); SDeb@EnergyOnLine.com (SDeb@EnergyOnLine.com); sean.kagiyama@nedosv.org (sean.kagiyama@nedosv.org); Greenacre, Wade (/O=PG&E/OU=Corporate/cn=Recipients/cn=WAG9); farshid.arman@siemens.com (farshid.arman@siemens.com); CalConsumersAlliance@gmail.com (CalConsumersAlliance@gmail.com); abining@energy.state.ca.us (abining@energy.state.ca.us); eim@cpuc.ca.gov (eim@cpuc.ca.gov); rmm@cpuc.ca.gov (rmm@cpuc.ca.gov); al4@cpuc.ca.gov (al4@cpuc.ca.gov); wmp@cpuc.ca.gov (wmp@cpuc.ca.gov); merideth.sterkel@cpuc.ca.gov (merideth.sterkel@cpuc.ca.gov); ag2@cpuc.ca.gov (ag2@cpuc.ca.gov); fxg@cpuc.ca.gov (fxg@cpuc.ca.gov); Ekelly@MarinEnergy.com (Ekelly@MarinEnergy.com); aw3@cpuc.ca.gov (aw3@cpuc.ca.gov); borion@lawyersforcleanenergy.com (borion@lawyersforcleanenergy.com); KO'Beirne@semprautilities.com (KO'Beirne@semprautilities.com);

dulce.gonzalez@senerusa.com (dulce.gonzalez@senerusa.com)
Cc: Haubenstein, Arthur L. (Perkins Coie) (AHaubenstein@perkinscoie.com)
Bcc:
Subject: Comments of BrightSource Energy, Inc. in CPUC Proceeding R.10-12-007

Please find attached the Comments of BrightSource Energy, Inc. on the Administrative Law Judge's Ruling Entering Interim Staff Report Into Record and Seeking Comments in CPUC Rulemaking 10-12-007.

Should you have any questions, please contact the undersigned.

Nidhi J. Thakar | Perkins Coie LLP
700 Thirteenth Street, N.W., Suite 600
Washington, D.C. 20005-3960
PHONE: 202.654.6242
FAX: 202.654.9942
E-MAIL: nthakar@perkinscoie.com

Eleven Consecutive Years on Fortune® magazine's "The 100 Best Companies to Work For"™

IRS CIRCULAR 230 DISCLOSURE: To ensure compliance with Treasury Department and IRS regulations, we inform you that, unless expressly indicated otherwise, any federal tax advice contained in this communication (including any attachments) is not intended or written by Perkins Coie LLP to be used, and cannot be used by the taxpayer, for the purpose of (i) avoiding penalties that may be imposed on the taxpayer under the Internal Revenue Code or (ii) promoting, marketing or recommending to another party any transaction or matter addressed herein (or any attachments).

NOTICE: This communication may contain privileged or other confidential information. If you have received it in error, please advise the sender by reply email and immediately delete the message and any attachments without copying or disclosing the contents. Thank you.