

DOCKETED

Docket Number:	07-AFC-06C
Project Title:	Carlsbad Energy Center - Compliance
TN #:	202886
Document Title:	Objections to Data Request Set 1 and Request for Time Extension
Description:	N/A
Filer:	Dee Hutchinson
Organization:	Locke Lord LLP
Submitter Role:	Applicant Representative
Submission Date:	8/5/2014 4:22:29 PM
Docketed Date:	8/5/2014



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August 5, 2014

VIA E-FILING

Carlsbad Energy Center Project Petition to Amend (07-AFC-6C)
Mike Monasmith, Project Manager
Paul Kramer – Hearing Officer
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

Re: Carlsbad Energy Center Project Petition to Amend (07-AFC-6C)
Objections to Data Request Set 1 and Request for Time Extension

Dear Mr. Monasmith:

On or about July 16, 2014, the California Energy Commission staff ("**Staff**") filed Data Request Set 1 (TN 202715) (the "**Data Requests**") in which Staff requested clarifying data related to Carlsbad Energy Center LLC's ("**Project Owner**") Petition to Amend ("**PTA**") the Carlsbad Energy Center Project (07-AFC-06C) ("**CECP**"). Responses to the Data Requests are due to Staff on or before August 15, 2014. Project Owner is working diligently to compile the requested data. During this process, Project Owner has determined that it will need additional time beyond August 15, 2014 to respond to certain Data Requests, and objects to certain other Data Requests.

1. Extension of Time to Respond. Pursuant to California Code of Regulations Title 20, Section 1716(f), Project Owner respectfully requests that the Committee extend Project Owner's deadline to respond to these Data Request Nos. 28, 29 and 30 until September 19, 2014. This additional time will allow Project Owner to compile the requested information.

a. Data Request Nos. 28 and 29. In Data Requests No. 28 and 29, Staff requested pre and post-project one-line and physical layout drawings of the San Diego Gas & Electric Company ("**SDG&E**") switchyards. Project Owner has requested these drawings from SDG&E. Project Owner expects to receive the post-project drawings in mid-September, and hereby requests additional time to provide this depiction.

b. Data Request No. 30. In Data Request No. 30, Staff requested California ISO reports. As California ISO is in the process of producing these reports, Project Owner requests additional time to provide them to Staff.

2. Objections. Project Owner respectfully objects to Data Request Nos. 24 and 25, and generally to Cannon Switchyard data in relation to Data Requests 21 through 30, for the following reasons:

a. Data Request Nos. 21 – 30: General Objection. The Background information for the Transmission System Engineering Data Requests states that the PTA does not include complete one-line diagrams of the Encina “Cannon” 230 kV Substation. Project Owner objects to Staff’s request for information on the configuration of the Cannon Substation because the version of the CECP proposed to be built in the PTA (the “**Amended CECP**”) will connect to the existing SDG&E switchyards at the project site. Furthermore, this Cannon substation is not built, might not be built, and if built, is unlikely to contain equipment owned by Project Owner.

b. Data Request No. 24: Objection to Type of Data Requested. As the Amended CECP will not require 138kV single line dead-end poles, Project Owner objects to Staff’s request for diagrams of such poles. Instead, Project Owner will provide Staff with the requested diagrams of 138kV/230kV double dead-end poles, which will be part of the project.

c. Data Request No. 25: Objection to Type of Data Requested. As the Amended CECP will not require 138kV single line tangent poles, Project Owner objects to Staff’s request for information on such poles. In the alternative, Project Owner will provide Staff with a 138kV/230kV double-circuit pole diagram containing the other information solicited in this Data Request.

On or before August 15, 2014, Project Owner will respond to all Data Requests for which Project Owner has not objected or requested a time extension in this letter. Please contact me or my colleague Allison Harris if you have questions or would like to discuss the contents of this letter.

Locke Lord LLP

By: 

John A. McKinsey
Attorneys for Carlsbad Energy Center LLC

JAM: awph