

DOCKETED

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Project Title:	Carlsbad Energy Center - Compliance
TN #:	203450
Document Title:	Project Owner's Response to POV re: Revised Figures 5-2 & 5-3 and Status of Objections to POV Data Requests 8, 9, 11, 12 & 13
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December 16, 2014

VIA E-FILING

Power of Vision
c/o Arnold Roe, Ph.D.
3210 Piragua Street
Carlsbad, CA 92009

Re: **Carlsbad Energy Center Project, 07-AFC-06C**
Revised Figures 5-2 and 5-3 and Status of Project Owner's
Objections to POV Data Requests 8, 9, 11, 12 and 13

Dear Power of Vision:

Thank you for your kind appreciation dated December 13, 2014 regarding Carlsbad Energy Center LLC's ("Project Owner") recent filing in the Carlsbad Energy Center Project Petition to Amend proceeding. I am writing to ensure that you do not misunderstand Project Owner's position or intent.

As you know, Project Owner has objected to certain data requests filed by Power of Vision ("POV") and has also opposed a petition by POV to require Project Owner to answer those data requests. The recent filing of revisions to Figures POV-5-2 and POV 5-3 did not change Project Owner's position regarding those outstanding data requests. Project Owner remains opposed to preparing answers for the reasons noted in its various filings on the matter.

As noted in the letter providing the revised Figures POV 5-2 and POV 5-3, Project Owner became aware of the fact that those two figures had not been updated to show the lowered gen tie poles when POV noted this at the Committee status conference on December 3, 2014. Because POV specifically requested these renderings be revised at that status conference, and because Project Owner realized that such a request was achievable and reasonable, Project Owner moved as quickly as it could to provide those revised figures.

Project Owner did not and does not see the provision of revised Figures 5-2 and 5-3 as being directly responsive to outstanding POV data requests 8, 9, 11, 12, and 13. There are some similarities between POV data request 5 and POV data request 11. Data request 11, however, is a separate and distinct data request that asks for substantially different information. Project

December 16, 2014
Page 2

Owner continues to object to data request 11 as well as the other outstanding POV data requests, 8, 9, 12 and 13. The reasons for those objections are noted, in particular, in Project Owner's response, dated November 26, 2014, to POV's petition.

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By: _____

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