

DOCKETED

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Project Title:	Carlsbad Energy Center - Compliance
TN #:	203485
Document Title:	Robert Sarvey's Support for Terramar's Motion to Delay the PSA Workshop until February 2015 and Extension Request for the PSA
Description:	N/A
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**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Petition to Amend
The Carlsbad Energy Center

Docket Number 07-AFC-06C

**ROBERT SARVEY'S SUPPORT FOR TERRAMARS'S MOTION TO DELAY THE PSA
WORKSHOP UNTIL FEBRUARY 2015 AND EXTENTION REQUEST FOR THE PSA
COMMENT PERIOD.**

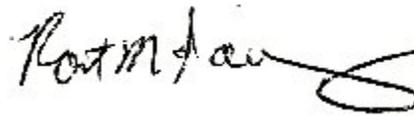
On December 24, 2014 Terramar filed a motion to delay the PSA workshop and the deadline to file comments on the PSA. Intervenor Sarvey supports Terramar's need for additional time to analyze and comment on the PSA. As Terramar noted the Preliminary Determination of Compliance (PDOC) was scheduled for issuance on November 10, 2014 according to the Committees October 30, 2014 schedule. The Staff's Preliminary Staff Assessment was expected to be released 30 days after the PDOC to allow Terramar and the other parties to analyze and provide comments to the Air District which grants a 30 day comment period for their PDOC. The PDOC is an imposing document for parties who are not familiar with air district permits.

Unlike the CEC Staff no draft PDOC was provided to Terramar as the Air District only provided a draft PDOC to CEC Staff. The 107 page PDOC was made available to the parties on December 12, 2014 over 1 month late. Three days later CEC Staff issued the 890 page PSA.

It is unreasonable to expect Terramar to respond to both the PDOC and the PSA within 30 days of issuance. The PDOC is a highly technical document that the air district appropriately allows 30 days for review and comment. The PSA on the other hand is a highly technical 890 page document covering over 20 topics. The CEC Staff has over 20 employees and contractors who prepare the PSA and no one individual processes or understands the entire document.

The Committee needs to realize that intervenors have other jobs and are not paid to commit 8-12 hours a day to meet the grueling schedule advanced in this proceeding. Unlike the Commissioners, applicant, and CEC staff intervenors do not have the resources to hire 20 people to do their work for them. It is appropriate to grant Terramar's motion for extension of time to file comments on the PSA.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Robert Sarvey", with a long, sweeping underline that extends to the right.

Robert Sarvey