In the Matter of: ) Docket No. 08-AFC-8A
) AMENDED APPLICATION FOR ) APPLICANT’S RESPONSE TO SIERRA
) CERTIFICATION FOR THE HYDROGEN ) CLUB’S MOTION TO COMPEL
) ENERGY CALIFORNIA POWER PLANT ) PRODUCTION OF INFORMATION IN
) PROJECT (“HECA”) ) RESPONSE TO DATA REQUESTS

Applicant has carefully reviewed Intervenor Sierra Club’s Reply to Sierra Club’s Motion to Compel filed on October 15, 2012. Applicant appreciates that Sierra Club has withdrawn its Motion with respect to four of the eight data requests initially included in the Motion. With respect to the remaining four data requests, for the reasons set forth in Applicant’s Response to the Motion filed on October 8, 2012, Applicant continues to object to the subject data requests.

DATED: October 16, 2012 Respectfully submitted,

/S/ Michael J. Carroll

Michael J. Carroll
LATHAM & WATKINS LLP
Counsel to Applicant
STATE OF CALIFORNIA
ENERGY RESOURCES
CONSERVATION AND DEVELOPMENT COMMISSION

In the Matter of: ) Docket No. 08-AFC-08A
REVISED APPLICATION FOR ) PROOF OF SERVICE
CERTIFICATION FOR THE HYDROGEN ) (October 9, 2012)
ENERGY CALIFORNIA POWER PLANT )
PROJECT (“HECA”) )
________________________________________

APPLICANT

Marisa Mascaro
SCS Energy LLC
30 Monument Square, Suite 235
Concord, MA 01742
mmascaro@scsenergyllc.com

Tiffany Rau
2629 Manhattan Avenue, PMB# 187
Hermosa Beach, CA 90254
Trau@heca.com

George Landman
Director of Finance and Regulatory Affairs
Hydrogen Energy California, LLC
500 Sansome Street, Suite 750
San Francisco, CA 94111
glandman@heca.com

APPLICANT’S CONSULTANT

Dale Shileikis
Vice President
Energy Services Manager
Major Environmental Programs
URS Corporation
One Montgomery Street, Suite 900
San Francisco, CA 94104-4538
dale_shileikis@urscorp.com
INTERESTED AGENCIES

California ISO
e-recipient@caiso.com

Marni Weber
Department of Conservation
Office of Governmental and Environmental Relations
(Department of Oil, Gas & Geothermal Resources)
801 K Street MS 2402
Sacramento, CA 95814-3530
Marni.Weber@conservation.ca.gov

INTervenors

California Unions for Reliable Energy
Thomas A. Enslow
Marc D. Joseph
Adams Broadwell Joseph & Cardozo
520 Capitol Mall, Suite 350
Sacramento, CA 95814
tenslow@adamsbroadwell.com

Tom Frantz
Association of Irritated Residents
30100 Orange Street
Shafter, CA 93263
tfrantz@bak.rr.com

Andrea Issod
Matthew Vespa
Kern-Kaweah Chapter
Of the Sierra Club
85 Second St, Second Floor
San Francisco, California 94105
andrea.issod@sierraclub.org
matt.vespa@sierraclub.org

Timothy O’Connor, Esq.
Environmental Defense Fund (EDF)
1107 Ninth St., Suite 540
Sacramento, CA 95814
toconnor@edf.org
George Peridas  
Natural Resources Defense Council  
111 Sutter Street, 20th Fl.  
San Francisco, CA 94104  
gperidas@nrdc.org

Benjamin McFarland  
Kern County Farm Bureau, Inc.  
801 South Mt. Vernon Avenue  
Bakersfield, CA 93307  
bmcfarland@kerncfb.com

ENERGY COMMISSION – DECISION MAKERS

Karen Douglas  
Commissioner and Presiding Member  
CALIFORNIA ENERGY COMMISSION  
1516 Ninth Street  
Sacramento, California 95814-5512  
karen.douglas@energy.ca.gov

Andrew McAllister  
Commissioner and Associate Member  
CALIFORNIA ENERGY COMMISSION  
1516 Ninth Street  
Sacramento, California 95814-5512  
andrew.mcallister@energy.ca.gov

Raoul Renaud  
Hearing Advisor  
CALIFORNIA ENERGY COMMISSION  
1516 Ninth Street  
Sacramento, California 95814-5512  
raoul.renaud@energy.ca.gov

Eileen Allen  
Commissioner’s Technical Advisor  
For Facility Siting  
CALIFORNIA ENERGY COMMISSION  
1516 Ninth Street  
Sacramento, California 95814-5512  
eileen.allen@energy.ca.gov
Galen Lemei
Advisor to Presiding Member
CALIFORNIA ENERGY COMMISSION
1516 Ninth Street
Sacramento, California 95814-5512
galen.lemei@energy.ca.gov

Jennifer Nelson
Advisor to Presiding Member
CALIFORNIA ENERGY COMMISSION
1516 Ninth Street
Sacramento, California 95814-5512
jennifer.nelson@energy.ca.gov

David Hungerford
Advisor to Associate Member
CALIFORNIA ENERGY COMMISSION
1516 Ninth Street
Sacramento, California 95814-5512
david.hungerford@energy.ca.gov

Pat Saxton
Advisor to Associate Member
CALIFORNIA ENERGY COMMISSION
1516 Ninth Street
Sacramento, California 95814-5512
patrick.saxton@energy.ca.gov

ENERGY COMMISSION – STAFF

Robert Worl
Project Manager
CALIFORNIA ENERGY COMMISSION
1516 Ninth Street
Sacramento, California 95814-5512
robert.worl@energy.ca.gov

John Heiser
Associate Project Manager
CALIFORNIA ENERGY COMMISSION
1516 Ninth Street
Sacramento, California 95814-5512
john.heiser@energy.ca.gov
DECLARATION OF SERVICE

I, Paul Kihm, declare that on October 16, 2012, I served and filed copies of the attached:

APPLICANT’S RESPONSE TO SIERRA CLUB’S MOTION TO COMPEL PRODUCTION OF INFORMATION IN RESPONSE TO DATA REQUESTS

to all parties identified on the Proof of Service List above in the following manner:

California Energy Commission Docket Unit

Transmission via electronic mail to:

CALIFORNIA ENERGY COMMISSION
Attn: DOCKET NO. 08-AFC-08A
1516 Ninth Street, MS-4
Sacramento, California 95814-5512
docket@energy.state.ca.us

For Service to All Other Parties

Transmission via electronic mail to all email addresses on the Proof of Service list.

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 16, 2012, at Costa Mesa, California.

/S/ Paul Kihm

Paul Kihm