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June 14, 2011

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VIA EMAIL AND HAND DELIVERY

The Honorable Carla Peterman
The Honorable Karen Douglas
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

DOCKET	
11-AFC-1	
DATE	JUN 14 2011
RECD.	JUN 14 2011

**Re: Pio Pico Energy Center Project (11-AFC-1)
Request for Extension to Submit Data Responses, Set One (#1-59);
Objections**

Dear Commissioners:

On May 25, 2011, Staff issued Data Requests, Set One (#1-59) ("Data Requests") and identified June 24, 2011 as the date by which responses to such Data Requests are due. Pursuant to Title 20, California Code of Regulations, Section 1716(f), Applicant herein requests an extension to respond to Data Requests, Set One (#1-59).

Applicant has worked diligently since the issuance of the Data Requests to obtain the responsive data Staff seeks in its requests. However, Applicant has identified numerous data requests that will require additional time beyond June 24, 2011 for Applicant to fully respond to. Such requests require, for example, additional modeling or analysis, additional design information, and/or input and coordination with other governmental agencies. As such, Applicant is seeking an extension to respond to the Data Requests and respectfully requests the Committee allow Applicant until July 15, 2011 to timely respond to Data Requests, Set One.

Further, Applicant herein objects to the following data requests: CUL-35, LAND-38, VIS-51 through VIS -53, and VIS-55. Such objections are set forth specifically below.

CUL-35: Applicant objects to the scope of Data Request CUL-35 on the basis that this request seeks information that will be overly burdensome for the Applicant to develop within the proposed timeframe. Further, certain information sought by CUL-35 is moot given the AFC Refinement filed on June 8, 2011.



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LAND-38: Applicant objects to Data Request LAND-38 to the extent that it seeks information beyond the control of Applicant.

VIS-51, VIS-52, and VIS-53: Applicant objects to Data Requests VIS-51 through VIS-53 on the basis that these requests seek information that will be overly burdensome for the Applicant to develop within the proposed timeframe and at this early stage of the AFC proceeding. Moreover, Applicant objects to Data Requests VIS-51 through VIS-53 to the extent that they seek information beyond the control of Applicant. However, Applicant will comply with all laws, ordinances, regulations, and standards with respect to Visual Resources.

VIS-55: Applicant objects to Data Request VIS-55 on the basis that this request seeks information that will be overly burdensome for the Applicant to develop within the proposed timeframe and at this early stage of the AFC proceeding. Moreover, Applicant objects to Data Requests VIS-55 to the extent that it seeks information beyond the control of Applicant. However, Applicant will comply with all laws, ordinances, regulations, and standards with respect to Visual Resources.

Notwithstanding the above objections, Applicant will respond to CUL-35, LAND-38, VIS-51 through VIS-53, and VIS-55, along with the remaining Data Requests in Set One, to the best of its ability.

Very truly yours,


Melissa A. Foster

MAF:jmw

cc: Proof of Service List

BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT
COMMISSION OF THE STATE OF CALIFORNIA
1516 NINTH STREET, SACRAMENTO, CA 95814
1-800-822-6228 – WWW.ENERGY.CA.GOV

APPLICATION FOR CERTIFICATION
FOR THE *PIO PICO ENERGY CENTER, LLC*

Docket No. 11-AFC-1
PROOF OF SERVICE
(Revised 5/12/11)

Pio Pico Energy Center, LLC

Letter to The Honorable Carla Peterman and The Honorable Karen Douglas,
California Energy Commission, dated June 14, 2011 re Request for Extension to
Submit Data Responses, Set One (#1-59); Objections

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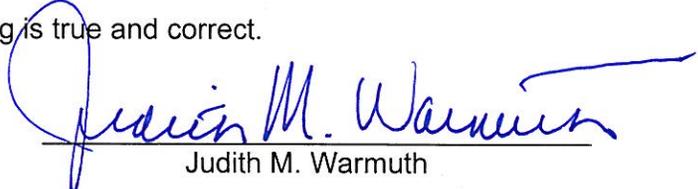
DECLARATION OF SERVICE

I, Judith M. Warmuth, declare that on June 14, 2011, I deposited copies of the aforementioned document in the United States mail at 500 Capitol Mall, Suite 1600, Sacramento, California 95814, with first-class postage thereon fully prepaid and addressed to those identified on the Proof of Service list above.

AND/OR

Transmission via electronic mail was consistent with the requirements of California Code of Regulations, Title 20, sections 1209, 1209.5, and 1210. All electronic copies were sent to all those identified on the Proof of Service list above.

I declare under penalty of perjury that the foregoing is true and correct.



Judith M. Warmuth