

ELLISON, SCHNEIDER & HARRIS L.L.P.

ANNE J. SCHNEIDER
1947-2010

CHRISTOPHER T. ELLISON
JEFFERY D. HARRIS
DOUGLAS K. KERNER
ROBERT E. DONLAN
ANDREW B. BROWN
GREGGORY L. WHEATLAND
CHRISTOPHER M. SANDERS
LYNN M. HAUG
PETER J. KIEL

ATTORNEYS AT LAW

2600 CAPITOL AVENUE, SUITE 400
SACRAMENTO, CALIFORNIA 95816
TELEPHONE: (916) 447-2166
FACSIMILE: (916) 447-3512
<http://www.eslawfirm.com>

BRIAN S. BIERING
JEDEDIAH J. GIBSON
CHASE B. KAPPEL
SHANE E. C. MCCOIN
SAMANTHA G. POTTENGER

OF COUNSEL:
ELIZABETH P. EWENS
CHERYL L. KING
MARGARET G. LEAVITT
RONALD LIEBERT

April 20, 2012

Commissioner Karen Douglas, Presiding Member
Commissioner Carla Peterman, Associate Member
Hidden Hills Solar Electric Generating System (11-AFC-2)
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

DOCKET	
11-AFC-2	
DATE	<u>APR 20 2012</u>
RECD.	<u>APR 20 2012</u>

Re: Hidden Hills Solar Electric Generating System (11-AFC-2): Notice Pursuant to
20 C.C.R. 1716(f): Staff Data Requests Set 2E.

Dear Commissioners Douglas and Peterman:

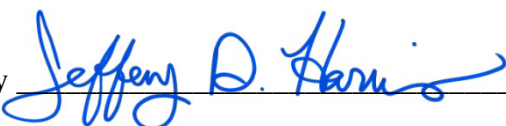
Pursuant to Section 1716(f) of the Commission’s regulations, Hidden Hills Solar I, LLC and Hidden Hills Solar II, LLC (collectively, the “Applicant”) hereby files this notice of objection to Data Requests Set 2E, issued by Staff on April 5, 2012.

Section 1716(e) of the Commission's regulations (Cal. Code Regs., tit. 20 § 1716) provides: “All requests for information shall be submitted no later than 180 days from the date the commission determines an application is complete, unless the committee allows requests for information at a later time for good cause shown.” (20 CCR § 1716(e).) The Commission determined the Hidden Hills Solar Electric Generating System (“HHSEGS”) application to be complete on October 5, 2011. Thus, the deadline for submitting requests for information was Monday, April 2, 2012, 180 days after the application was determined to be complete. Therefore pursuant to Section 1716(e), Applicant objects to Data Requests Set 2E as untimely.

However, without waiving Applicant’s right to object to the untimely requests, the Applicant will respond to all of Staff’s requests in Set 2E.

Thank you for your time and consideration.

Sincerely,
ELLISON, SCHNEIDER & HARRIS L.L.P.

By 

Jeffery D. Harris
Attorneys for Applicant

STATE OF CALIFORNIA

Energy Resources Conservation
and Development Commission

Application for Certification for the HIDDEN)
HILLS SOLAR ELECTRIC GENERATING) Docket No. 11-AFC-2
SYSTEM PROJECT)
_____)

PROOF OF SERVICE

I, Karen A. Mitchell, declare that on April 20, 2012, I served the attached *Hidden Hills Solar Electric Generating System (11-AFC-2): Notice Pursuant to 20 C.C.R. 1716(f): Staff Data Requests Set 2E* via electronic and U.S. mail to all parties on the attached service list.

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



Karen A. Mitchell

SERVICE LIST
11-AFC-2

APPLICANT

Stephen Wiley
BrightSource Energy
1999 Harrison Street, Suite 2150
Oakland, CA 94612-3500
swiley@brightsourceenergy.com

Andrew Miller
Michelle L. Farley
BrightSource Energy
1999 Harrison Street, Suite 2150
Oakland, CA 94612-3500
amiller@brightsourceenergy.com
mfarley@brightsourceenergy.com

Clay Jensen
Gary Kazio
BrightSource Energy
410 South Rampart Blvd., Suite 390
Las Vegas, Nevada 89145
cjensen@brightsourceenergy.com
gkazio@brightsourceenergy.com

APPLICANT'S CONSULTANTS

Susan Strachan
Strachan Consulting, LLC
P.O. Box 1049
Davis, CA 95617
susan@strachanconsult.com

John Carrier
CH2MHill
2485 Natomas Park Drive, Suite 600
Sacramento, CA 95833-2987
jcarrier@ch2m.com

COUNSEL FOR APPLICANT

Chris Ellison
Jeff Harris
Samantha Pottenger
Ellison, Schneider and Harris, LLP
2600 Capitol Avenue, Suite 400
Sacramento, CA 95816-5905
cte@eslawfirm.com
jdh@eslawfirm.com
sgp@eslawfirm.com

INTERESTED AGENCIES

California ISO
e-recipient@caiso.com

Great Basin Unified APCD
Duane Ono
Deputy Air Pollution Control Officer
157 Short Street
Bishop, CA 93514
dono@gbuapcd.org

Dana Crom, Deputy County Counsel
County of Inyo
P.O. Box M
Independence, CA 93526
dcrom@inyocounty.us

Lorinda A. Wichman, Chairman
Nye County Board of County Supervisors
P.O. Box 153
Tonopah, NV 89049
lawichman@gmail.com

L. Darrel Lacy
Interim General Manager
Nye County Water District
2101 E. Calvada Blvd., Suite 100
Pahrump, NV 89048
llacy@co.nye.nv.us

Michael L. Elliott
Cultural Resources Specialist
National Park Service
National Trails Intermountain Region
P.O. Box 728
Santa Fe, NM 87504-0728
Michael_Elliott@nps.gov

INTERVENORS

Jon William Zellhoefer
P.O. Box 34
Tecopa, CA 92389
jon@zellhoefer.info

Lisa T. Belenky, Sr. Attorney
Center for Biological Diversity
351 California Street, Ste. 600
San Francisco, CA 94104
e-mail service preferred
lbelenky@biologicaldiversity.org

Ileene Anderson, Public Lands
Desert Director
Center for Biological Diversity
PMB 447
8033 Sunset Boulevard
Los Angeles, CA 90046
e-mail service preferred
ianderson@biologicaldiversity.org

Jack Prichett
Old Spanish Trail Association
857 Nowita Place
Venice, CA 90291
jackprichett@ca.rr.com

**ENERGY COMMISSION –
DECISIONMAKERS**

Karen Douglas
Commissioner and Presiding Member
e-mail service preferred
kldougl@energy.state.ca.us

Carla Peterman
Commissioner and Presiding Member
cpeterma@energy.state.ca.us

Ken Celli
Hearing Officer
kcelli@energy.state.ca.us

Galen Lemei
Adviser to Commissioner Douglas
e-mail service preferred
glemei@energy.state.ca.us

Jim Bartridge
Adviser to Commissioner Peterman
jbartrid@energy.state.ca.us

ENERGY COMMISSION STAFF

Mike Monasmith
Senior Project Manager
mmonasmi@energy.state.ca.us

Richard Ratliff
Staff Counsel IV
dratliff@energy.state.ca.us

ENERGY COMMISSION – PUBLIC ADVISER

Jennifer Jennings
Public Adviser's Office
e-mail service preferred
publicadviser@energy.state.ca.us