STATE OF CALIFORNIA

Energy Resources Conservation and Development Commission

In the Matter of:	)	
	)	
Application for Certification for the	)	
San Joaquin Solar 1 and 2 Hybrid Power Plant	)	Docket No. 08-AFC-12
	)	
San Joaquin Solar 1 and 2 LLC	)	

SAN JOAQUIN SOLAR 1 AND 2, LLCS'

RESPONSE TO

CALIFORNIA UNIONS FOR RELIABLE ENERGY'S

MOTION TO COMPEL PRODUCTION OF INFORMATION

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San Joaquin Solar 1 LLC and San Joaquin Solar 2 LLC, collectively referred to as San Joaquin Solar or "Applicant," provide this Response to "California Unions for Reliable Energy's ("CURE") Petition to Compel Production of Information in Response to CURE Data Requests, Set Three" ("Petition"). CURE served this Petition on the Applicant on September 16, 2009.

CURE's Petition requests an order directing Applicant to provide information requested in CURE's Set 3, Data Requests 57 and 85.[1] As to Data Request 85, the Applicant inadvertently omitted its response to this Data Request when it responded to CURE on August 17, 2009. Applicant has attached as Appendix A the information requested by Data Request 85.

As to Data Request 57, the Applicant objects to this request on three grounds. First, Data Request 57, as with all of CURE's data requests, is calculated to serve no purpose other than to

[1] California Unions for Reliable Energy Petition to Compel Production of Information in Response to CURE Data Requests, Set Three, Sept. 16, 2009, p. 1 ("CURE Petition")

harass, burden, and oppress Applicant and delay Applicant's Application for Certification ("AFC"). Second, the requested information is neither relevant nor reasonably necessary for the Commission to make a decision on this Application, as the Commission is not required to analyze alternatives to this facet of the San Joaquin Solar 1 & 2 Hybrid Project ("Project"). Third, CURE's request for specialized detailed cost-analysis crosses the line between "discoverable data and undiscoverable analysis" and is not reasonably available to the Applicant. Based on these grounds, and as explained more fully below, CURE's Petition should be denied.

I. CURE's goal is labor organizing under the National Labor Relations Act and not legitimate CEQA or other objectives within the Commission's jurisdiction.

CURE engages in a pattern and practice of Commission intervention to promote labor organizing objectives of CURE's member unions rather than for legitimate objectives under CEQA or Commission regulations. The Applicant submits that a full investigation of CURE's activities will demonstrate that where projects that are the subject of applications for certification are covered by CURE construction labor agreements, CURE does not and will not take any action within Commission jurisdiction to negatively impact the review or processing of the covered projects. CURE only takes negative action such as the service of burdensome and oppressive data requests like the ones at issue here when applicants cannot or do not enter construction labor agreements in what CURE considers to be a sufficient time period before or shortly after filing the AFC. This practice calls into question the legitimacy of CURE's intervention and justifies severely curtailing and restricting CURE's rights in proceedings like this one where but for failed organizing objectives, there would be no or little CURE activity. Failure to curtail and severely restrict CURE merely emboldens the organization and motivates it to become more entrenched in resistance to the AFC and the Project covered by the AFC.

A. CURE's labor organizing is illegal and, despite the Applicant's efforts to meet and resolve the labor issues with CURE, CURE is using the Commission to coerce the Applicant to engage in illegal activity**.**

1. *CURE is a labor organization.*

CURE is comprised of officials from the California State Building & Construction Trades Council ("Council") and a small number of local mechanical building and construction trades unions in California representing workers in the construction industry. CURE's president, Robert Balgenorth, is also the president of the Council. CURE's attorney who negotiates labor agreements with Commission applicants is the legal counsel in this matter before the Commission, Adams Broadwell Joseph & Cardozo. Consistent with CURE's pattern and practice of labor organizing through the Commission, after Applicant filed its AFC in this matter, CURE and its legal counsel initiated efforts to seek construction labor agreements for the Project. Finalizing construction labor agreements as demanded by CURE appears to be the only way Applicant will cause CURE to cease or limit its data requests and other activity in this proceeding.

2. *The Applicant is prohibited from entering construction labor agreements sought by CURE in return for CURE's cooperation before the Commission.*

The Commission should deny CURE’s Petition to Compel in view of the fact that the Applicant does not have legal standing to satisfy CURE's organizational goals to avoid further adverse action in the permitting proceeding. Applicant does not have legal standing to enter the construction labor agreements demanded by CURE under the National Labor Relations Board decision in *Glens Falls Building and Construction Trades Council*, 350 NLRB No. 42 (July 31, 2007) (*Indeck II*). The *Indeck II* case concluded that several construction industry unions violated the NLRA by coercing a project owner to sign a project labor agreement for

construction similar to what CURE has demanded of the Applicant in this case. The construction labor agreement at issue in *Indeck II* was rendered void and unenforceable as an illegal agreement. Illegal construction labor agreements could expose owners who sign them to liability under federal labor law and other jurisprudence. Therefore, entering into the labor agreements that CURE demands, in order to settle any issues and/or eliminate CURE's intervention activity in this proceeding, could subject Applicant to legal exposure under federal labor law and possibly other jurisprudence.

3. *The Applicant made an effort to appease CURE and relieve the Commission and the Applicant from CURE's activities.*

The Commission should sustain the Applicant's objection in view of the fact that Applicant has attempted to meet and resolve any issues with CURE in good faith, including the representation that the Applicant will retain union contractors who may lawfully execute agreements with CURE for labor. Representatives from Applicant met with CURE's legal counsel in July. At that time, Applicant stated that it intended to use Union labor on the Project, but that the Applicant did not have legal standing to enter into labor agreements for construction under the NLRB's decision in *Indeck II*. CURE demanded that Applicant secure union contractors immediately. Applicant explained that it cannot secure contractors prior to certification and financing of the Project. Nonetheless, CURE has continued to interfere in the AFC process. Under these circumstances, Applicant is highly prejudiced by CURE's actions in this proceeding whereas there is little harm to CURE if its actions in this matter are restricted to more reasonable participation.

Notwithstanding the fact that CURE's data requests are not intended to serve any legitimate purpose under CEQA or the Commission rules, the Applicant has acted, at considerable expense, to provide requested data that is reasonably available to the Applicant and

reasonably necessary for the Commission to reach a decision on the Application. However, in the instance of Data Request 57, even if the purpose of CURE's intervention was bona fide and even if CURE had a sincere interest in this Application apart from labor organizing, Data Request 57 is improper and CURE's motion to compel a response to Data Request 57 should be denied.

II. The information requested by CURE in Data Request 57 is not relevant or reasonably necessary for the Commission to make a decision on the Application.

CURE's Data Request 57 asks the Applicant to perform and document a detailed cost analysis as follows:

> "…[A] detailed cost analysis for the proposed evaporation ponds and an alternative ZLD system. Please include in the cost analysis costs for costs [sic] for disposal of the deposits in the evaporation ponds at the end of the facility life as well as potentially required mitigation for impacts on wildlife such as netting, anti-perching devices, or hazing activities to keep birds from accessing the evaporation ponds. Please document all assumptions." [2]

CURE asserts that a "cost analysis of a ZLD as an alternative to evaporation ponds is relevant and reasonably necessary to make a decision on the application" as a ZLD system "is an alternative" that could "avoid or substantially lessen significant effects of the Project."[3] CURE then cites to CEQA, Warren-Alquist Act, and Commission Regulations to support its assertion that the requested information is relevant and necessary. CURE'S assertions are entirely without merit.

At the outset, it must be noted that the Project is designed as a zero liquid discharge (ZLD) facility, and will utilize lined evaporation ponds in its wastewater management system to contain reverse osmosis reject water and evaporate wastewater.[4] As explained in our response to Staff Data Request Set 1, an evaporation pond is a part of a zero liquid discharge system

[2] CURE Data Requests, Set Three, July 27, 2009 ("CURE Data Requests Set 3"), Data Request 57.
[3] CURE Petition, pp. 5 & 7.

designed to reduce liquid wastes to dry through evaporation by solar heat.[5] The reduction of liquid wastes to dry can also be achieved through the use of mechanical ZLD systems. These systems utilize various processes such as reverse osmosis, brine concentrators, thermal and membrane technology, or crystallizers to evaporate liquid wastes.[6] These various processes, which are all quite different in their cost, design and operation, are sometimes "coupled with evaporation ponds" to ensure zero liquid discharge.[7] Therefore, when CURE requests an analysis of "a ZLD system as an alternative," CURE is requesting information as to alternatives for a specific portion of the project (limited facets of the wastewater management system), rather than alternatives to the Project as a whole.

A. Cost-analyses of the proposed evaporation ponds and a mechanical ZLD system alternative are not relevant or necessary to the Commission's determination of Applicant's AFC as the information relates to specific facets of the Project design, rather than the Project as a whole.

CURE cites to CEQA to support its assertion that the requested cost analysis is "necessary and relevant," by noting that projects should not be approved "if there are feasible alternatives or feasible mitigation measures which would substantially lessen significant effects of the Project."[8]

CEQA and EIR guidelines require that "an EIR describe alternatives to the proposed *project* [emphasis added by the court]… as a whole, not the various facets thereof." [9] It is well

[4] San Joaquin Solar 1& 2 Hybrid Project, Application for Certification, Nov. 20, 2008 (" SJS AFC"), pp. 3-6 & 5.5-13.
[5] SJS Complete Response to CEC Data Request, Set #1, (July 14, 2009), p. Waters and Soils-17.
[6] Charles H. Fritz, *An Economical New Zero Liquid Discharge Approach for Power Plants*, Power-Gen International, December 10-12, 2002, p. 2.
[7] *Id.*
[8] CURE Petition, p. 5.
[9] *Big Rock Mesas Property Owners Association v. Board of Supervisors* (2d Dist. 1977) 73 Cal. App. 3d 218, 227; *see also California Native Plant Society v. City of Santa Cruz*, (6th Dist. 2009) 2009 Cal. App. LEXIS 1551, 58 (changed from unpublished to published Sept. 18, 2009); *A Local & Regional Monitor v. City of Los Angeles* (1993) 16 Cal.App.4th 630, 642, fn. 8; *No Oil v. City of L.A.* (2d Dist. 1987)196 Cal. App. 3d 223, 234.
.

settled that CEQA does not impose an obligation to analyze alternatives to *parts* of a project.[10] CURE's Data Request 57 seeks to compel cost-analyses of the "feasibility of a [mechanical] ZLD system"[11]as an "alternative to evaporation ponds for the Project."[12] As noted above, the evaporation ponds are only a portion of the wastewater management system, which itself is only a facet of the Project as a whole. Information pertaining to the relative costs of an evaporation pond as compared to an unspecified mechanical ZLD system is not required by CEQA for the Commission to make a decision on this Application, as that information is relevant only to a small facet of the overall Project. Therefore, as the cost-analysis is neither relevant nor necessary, CURE's Petition to Compel a response to Data Request 57 should be denied.

B. <u>The requested cost analysis is not reasonably necessary to ensure compliance with CEQA or Commission regulations because CURE has not identified any significant adverse effects from use of an evaporation pond ZLD system.</u>

Consideration of project alternatives is guided by the "rule of reason," and limited to those alternatives that would avoid or substantially lessen any of the significant impacts of a project.[13] Despite CURE's implied assertion that a mechanical ZLD system, such as a "reverse osmosis and/or brine concentrator,"[14] could "avoid or substantially lessen significant effects of the Project," CURE fails to identify those alleged significant effects. Indeed, CURE's data request ignores information already submitted by the Applicant to the Commission that impacts on local wildlife from the evaporation pond are not expected to be significant.[15] A comparison of various forms of ZLD systems might be relevant and necessary if there was a need to avoid a significant adverse impact caused by the Project. However, in this instance CURE has not cited any such impact. As a result, the requested cost-analysis of a different, more technological, more

[10] *Big Rock Mesas Property Owners Association v. Board of Supervisors* (2d Dist. 1977) 73 Cal. App. 3d 218, 227.
[11] CURE Petition, p. 7.
[12] CURE Petition, p. 5.
[13] *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 565, 576. ("Goleta II")

complex, and more expensive unspecified ZLD system alternative is not reasonably necessary to any decision the Commissions must make on this Application.

C. The requested information is not reasonably necessary to ensure compliance with the Warren Alquist Act or Commission regulations.

CURE also attempts to rely on the Warren-Alquist Act and Commission regulations as authority that the requested cost-analyses are relevant and necessary. CURE states that "information related to the project's impact on public health and safety, as well as the project's compliance with LORS, is relevant and necessary to the [sic] make a decision on the AFC."[16] Yet beyond a mere statement of the language of the Warren-Alquist Act, CURE fails to show how the Warren-Alquist Act applies to make this very specific cost-analyses of unspecified ZLD technologies relevant to this AFC proceeding. In fact, CURE provides no explanation as to how cost analyses of an evaporation pond and mechanical ZLD systems would help "assure the public's health and safety" or help determine the Project's "conformity with other laws, ordinances, regulations, and standards."[17] As a result, the Warren-Alquist Act provides no support for CURE's assertion that the requested information is relevant and reasonably necessary to any decision the Commission must make on this Application. Therefore, CURE's Petition should be denied.

III. CURE's request for specialized cost-analyses focusing on specific factors identified by CURE crosses the line between "discoverable data and undiscoverable analysis" and the requested information is not reasonably available to the Applicant

An answering party is not "required to perform research or analysis on behalf of the requesting party.[18] In determining whether the requested information is "discoverable data" or

[14] CURE Data Request Set 3, Background to Data Request 57.
[15] SJS Response to CEC Data Request Set #1, p. BIO-8.
[16] CURE Petition, p. 6
[17] CURE Petition, p. 6
[18] Committee Ruling on Intervenor Center for Biological Diversity's Petition to Compel Data Responses, Application for Certification for the Carlsbad Energy Center, Docket No. 07-AFC-6, Dec. 26, 2008.

"undiscoverable analysis and research," the Commission considers four general factors: the relevance of the information; the availability of the information (including whether it has already been provided in some form); the type of information requested (data, analysis, or research); and the burden on the applicant to provide the data.[19] The relevance of the information has been discussed above in Section II, while the remainder of the factors will be discussed below.

A. The cost-analyses requested in CURE's Petition is not reasonably available to the Applicant, and would require Applicant to undertake a specialized cost-analyses at the direction of a third party.

CURE asserts that the "information for a cost analysis must be reasonably available to the Applicant". [20] However, CURE fails to recognize the difference between asking for available information and requiring an Applicant to undertake specialized cost analyses and research at the direction of a third party. Far from being a simple request for data reasonably available to Applicant, CURE's data request asks the Applicant to perform specific, separate analyses of the costs of an evaporation pond and an unspecified "alternative ZLD system."[21] In addition to being vague about the type of ZLD system it expects to be analyzed, CURE also asks for the costs of "potentially required mitigation for impacts on wildlife" for each system, without specifying what those "potential" mitigation measures might be. [22] The Commission has specifically stated that an answering party does not have the burden to "perform research or analysis on behalf of the requesting party," and CURE's request crosses far beyond the line from discoverable data into undiscoverable analysis.[23] Moreover, neither the Applicant nor the Commission should be expected to read CURE's mind and guess as to what ZLD systems CURE believes should be

[19] Committee Ruling on Intervenor Center for Biological Diversity's Petition to Compel Data Responses, Application for Certification for the Carlsbad Energy Center, Docket No. 07-AFC-6, Dec. 26, 2008, p. 2.
[20] CURE Petition, pp. 8& 9.
[21] CURE Data Request Set 3, p. 10.
[22] CURE Data Request Set 3, p. 10.
[23] Committee Ruling on Intervenor Center for Biological Diversity's Petition to Compel Data Responses, Application for Certification for the Carlsbad Energy Center, Docket No. 07-AFC-6, Dec. 26, 2008, p. 2.

analyzed or what "potential mitigation measures" should be included. Given that the purpose of CURE's requests are to simply harass the Applicant and delay the proceeding, should the Commission indulge this frivolous request, it is more than likely that CURE will follow with further requests or arguments that the wrong ZLD technology had been analyzed or that the wrong mitigation measures were included. Therefore, CURE's Petition should be denied.

B. Applicant does not have the burden to perform the requested cost analysis for CURE.

Data Request 57, by its express terms, requests a "detailed cost analysis" for the proposed evaporation ponds and an unidentified alternative ZLD system. Data Request 57 appears to request a "life-cycle" analysis that takes into account both the costs of design, construction and operation of the alternative systems. CURE insists that the analysis be fully documented. Even if the Applicant could divine what alternative should be analyzed or what potential mitigation measures should be included, the task of developing a detailed, documented cost analysis as specified by CURE would be costly and time consuming. A detailed, documented analysis would necessarily involve substantial engineering and financial expertise. It is precisely this type of burden and expense on the Applicant that the Commission's discovery rules prohibit.

CURE avoids the fact that it has asked Applicant to perform specialized cost-analyses on CURE's behalf by asserting that Applicant instead has the burden to produce the document for three reasons. Each of these reasons is without merit.

First, CURE asserts that "Energy Commission regulations *and* CEQA [ ] require an evaluation of the comparative economic merits of alternatives."[24] As we explain above, neither of those sources require an evaluation of alternatives for portions of the project, just the project as a whole. Moreover, CEQA requires an evaluation of alternatives that are necessary to avoid

[24] CURE Petition, p. 9

significant impacts. [25] CURE has failed to identify any significant effects posed by the ZLD technology proposed by the Applicant.

Second, CURE mischaracterizes portions of the Energy Commission's 2003 Integrated Policy Report to imply that Applicant is required to show that an evaporation pond is "economically unsound."[26] In its 2003 Integrated Energy Policy Report, the Energy Commission stated the need to reduce the use of fresh water in power plants, and that power plants using fresh water for cooling purpose should implement zero-liquid discharge technologies.[27] However, as noted in its AFC, the San Joaquin Solar Project will not use fresh water for cooling purposes.[28] Therefore, the Applicant's proposed use of recycled water and the proposed use of evaporation ponds as part of the zero liquid discharge system are entirely consistent with the policies of the 2003 Integrated Energy Policy Report.

Third, CURE attempts to justify its request by stating that the AFC itself "purports" to conduct the same type of analysis as that requested in CURE's data request. However, CURE did not merely request the information that Applicant relied upon to conclude that a mechanical ZLD system would have higher costs. Instead, contrary to Commission policy, CURE has asked the Applicant to perform very specialized cost-analyses that address specific factors directed by CURE.

CURE's assertions that Applicant has the burden to produce its requested information is without merit, as Applicant does not have the burden under either CEQA, Commission regulations, or Commission policy to research and undertake CURE's requested specialized cost-

[25] Goleta II, supra note 12, at 576.
[26] CURE Petition, p. 9.
[27] California Energy Commission, 2003 Integrated Energy Policy Report, Dec. 2003, p. 41.
[28] SJS AFC, p. 4-6.

analyses. As Applicant does not have the burden to produce "undiscoverable analysis" to a requesting party, CURE's Petition should be denied.

CONCLUSION

CURE's Petition addresses two data requests.

The response to Data Request 85 was inadvertently omitted from our prior response and is provided herein as Appendix A.

As to Data Request 57, the Commission should deny the Petition to Compel. Applicant has proposed to construct a zero liquid discharge facility that utilizes recycled water and an evaporation pond to dispose of the water. Not only does CEQA not require alternatives analysis of limited facets of a project, in the absence of a showing that the evaporation pond will result in significant, adverse environmental impacts, a further detailed analysis of more expensive or more complex mechanical ZLD technologies is not relevant or reasonably necessary to any decision the Commission must make on this Application. Furthermore, the requested cost-analysis is not reasonably available to the Applicant and would impose a substantial burden on the Applicant. CURE's Petition to Compel a response to Data Request 57 should be denied.

Dated: October 1, 2009

Respectfully submitted,

ELLISON, SCHNEIDER & HARRIS L.L.P.

By _____

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Appendix A
San Joaquin Solar 1 & 2 Hybrid Project
Supplemental Information
In Response to CURE Data Request Set #3
08-AFC-12

Data Request 85: Please discuss and quantify the potential side product formation from the SCR and SNCR systems such as isocyanic acid, nitrous oxide, ammonia, hydrogen cyanide, etc. under unfavorable conditions.

Response: SJS plans to employ a highly efficient, precedent setting design for emission control from the biomass facilities. Emission controls include the addition of limestone in the combustion bed, selective non catalytic reduction (SNCR), cyclones, dry scrubber, baghouse, selective catalytic reduction (SCR), and a wet scrubber. The SNCR and the SCR are used to reduce NOx emissions by over 97%. Formation of side products such as isocyanic acid, nitrous oxide, ammonia, hydrogen cyanide, etc. are possible in the SCR and SNCR systems under unfavorable conditions.

Favorable conditions (conditions that limit the formation of undesirable side products) for the SNCR operation include a operating temperature between 1560- 1710 F, residence time greater than 1 sec, thorough mixing in the combustion chamber and good process control to maintain stable temperature and excess air flow. The SNCR at SJS is located in the biomass combustor which operates at approximately 1650F, has a residence time greater than 2 seconds, is a fluidized bed which operates with high amount of turbulence, and the process is controlled using a distributive control system. Operation of the SJS biomass facility will be controlled to maintain SNCR favorable conditions and minimize, if not eliminate, the formation of these side products during unfavorable conditions. We are not aware of any methodology that permits the accurate quantification of side product formation, if any, during unfavorable conditions because the nature, frequency and duration of unfavorable conditions, should they occur, cannot be accurately forecasted.

Three main parameters of SCR operation are the catalyst temperature, the molar ratio of the reducing agent and the space velocity. Space velocity influences the maximum NOx reduction and the formation of side products. The SCR manufacturer has not yet been selected thus the specifics of these main parameters is not finalized. The SCR will be designed such that the formation of undesirable side products is minimized.

References:
1st World Conference on Biomass for Energy and Industry, Volume II, by Spyros Kyritsis, 2001

STATE OF CALIFORNIA

Energy Resources Conservation
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Application for Certification for the San Joaquin Solar 1 and 2 Hybrid Power Plant San Joaquin Solar 1 and 2 LLC	))))	Docket No. 08-AFC-12

PROOF OF SERVICE

I, Karen A. Mitchell, declare that on October 1, 2009, I served the attached *San Joaquin Solar 1 And 2, LLCs' Response To California Unions For Reliable Energy's Motion To Compel Production Of Information* 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

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