

<b>DOCKETED</b>	
<b>Docket Number:</b>	23-AFC-02
<b>Project Title:</b>	Elmore North Geothermal Project (ENGP)
<b>TN #:</b>	257983
<b>Document Title:</b>	Request to Extend Commenting Deadline to Accommodate Technical and Mitigation Workshop Scheduled for 7-31-24
<b>Description:</b>	N/A
<b>Filer:</b>	Matthew Maclear
<b>Organization:</b>	Aqua Terra Aeris Law Group
<b>Submitter Role:</b>	Intervenor Representative
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<b>Docketed Date:</b>	7/24/2024

**STATE OF CALIFORNIA**  
**STATE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT**  
**COMMISSION**

IN THE MATTER OF:

ELMORE NORTH GEOTHERMAL  
PROJECT (ENGP) APPLICATION  
FOR CERTIFICATION

Docket No. 23-AFC-02

**UNITED AUTOMOBILE, AEROSPACE, AND AGRICULTURAL**  
**IMPLEMENT WORKERS OF AMERICA**  
**REQUEST TO EXTEND COMMENTING DEADLINE TO**  
**ACCOMMODATE TECHNICAL AND MITIGATION WORKSHOP**  
**SCHEDULED FOR JULY 31, 2024**

July 24, 2024

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## ELMORE NORTH BAY GEOTHERMAL PROJECT

### REQUEST TO EXTEND COMMENTING DEADLINE TO ACCOMMODATE TECHNICAL AND MITIGATION WORKSHOP SCHEDULED FOR JULY 31, 2024

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**To the California Energy Commission and its Staff,**

United Automobile, Aerospace, and Agricultural Implement Workers of America (“UAW”), a party to the proceedings governing the authorization process for the Elmore North Geothermal Project, Morton Bay Geothermal Project, and Black Rock Geothermal Project (collectively, the “Projects”), respectfully requests that the California Energy Commission (“CEC”) extend the commenting deadline for the public to submit comments on the Preliminary Staff Assessment (“PSA”) for the Elmore North Geothermal Project to accommodate the recently-announced workshop the CEC plans to host on Wednesday, July 31, 2024. That workshop was announced on Friday, July 19, 2024. (*See* Notice of Preliminary Staff Assessment Technical and Mitigation Workshop July 31-August 1, 2024 (TN-257851) at 1.) Because the workshop is intended to inform the public’s understanding of the Projects, it is critical this workshop be held prior to the close of the comment period for the Elmore North Geothermal Project. Indeed, it is common practice for agencies to host such workshops during the California Environmental Quality Act (“CEQA”) commenting period, not after. (*See, e.g.*, Pub. Resources Code § 21168.6.9(e)(3) [requiring analogous workshop within ten days after release of draft environmental impact report].) Planning this workshop for after the commenting deadline for the Elmore North Geothermal Project prevents parties from submitting as thorough comments as they otherwise would be able to and thereby deprives the CEC, its staff, and the public of the full benefits of the CEQA process. Accordingly, UAW requests that the CEC extend the deadline for commenting on the PSA for the Elmore North Geothermal Project until after the CEC hosts the workshop described in its recent announcement.<sup>1</sup>

Moreover, UAW also requests that the CEC delay the date of the workshop for at least two weeks to allow participants to plan to attend. Parties were only notified of the workshop on July 19, 2024 (last Friday) and have only until July 31, 2024 (next Wednesday) to prepare to attend the workshop. This short notice makes it difficult for UAW’s members (and UAW itself) to attend and even more difficult to prepare questions and comments. Consequently, UAW also urges the CEC to reschedule the workshop for at least two weeks.

If you have any questions about this request, please do not hesitate to contact me at (415) 568-5200 or [mcm@atalawgroup.com](mailto:mcm@atalawgroup.com).

Respectfully submitted,



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Matthew C. Maclear  
Attorneys for UAW

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<sup>1</sup> The public comment deadline for Morton Bay and Black Rock should also be extended until after the date of the workshop, assuming the workshop is rescheduled as requested herein.