

<b>DOCKETED</b>	
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<b>Project Title:</b>	Black Rock Geothermal Project (BRGP)
<b>TN #:</b>	259371
<b>Document Title:</b>	United Automobile, Aerospace, and Agricultural Implement Workers of America's Comments on Schedule for the Black Rock Geothermal
<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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4030 MARTIN LUTHER KING JR. WAY  
OAKLAND, CA 94609

MATTHEW C. MACLEAR  
PARTNER

T: 415-568-5200  
mcm@atalawgroup.com

September 30, 2024

**Via Docket No. 23-AFC-03**

California Energy Commission  
715 P Street  
Sacramento, CA 95814

**RE: United Automobile, Aerospace, and Agricultural Implement Workers of America's  
Comments on Schedule for the Black Rock Geothermal Project Proceedings**

We write on behalf of United Automobile, Aerospace, and Agricultural Implement Workers of America ("UAW") regarding the CEC Staff and Applicants' Joint Proposed Schedules for the Black Rock Geothermal Project ("Project") filed September 27, 2024. UAW generally agrees with the timelines and proposals submitted by CEC Staff and the Applicant, except for a few areas, which we believe are important to Intervenor's and public participation in the remaining administrative process.

The Applicant and CEC Staff proposed "that evidentiary hearings should be held on consecutive days and separated by project. The Applicants and CEC Staff agreed that it may be possible to utilize a hybrid approach, where certain issues are held on certain days, but separated by project." UAW believes that it is critical that Intervenor's witnesses be permitted to speak to all three projects at once for efficiency. While we recognize that it is important for witnesses to be clear which Project they are speaking about, the overlap between the three geothermal projects being considered are significant. To reduce the cost and time burden on Intervenor's, we ask the CEC to allow witnesses to speak to all three projects at one time.

In addition, we agree that the evidentiary hearings should be held in Imperial County. However, we request that a teleconference option, such as Zoom, be available to UAW members and partners, as well as other members of the community and the public, can watch the proceedings. In addition, if witnesses are not able to travel to Imperial County, they should be permitted to appear via Zoom.

Thank you for considering these comments.

Respectfully,

A handwritten signature in blue ink, appearing to read "Maclear", written over a stylized blue line that spans the width of the signature area.

Matthew C. Maclear  
AQUA TERRA AERIS LAW GROUP