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TN #:	201976-1
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STATE OF CALIFORNIA

Energy Resources Conservation
and Development Commission

In the Matter of:

Petition for Amendment for the PALEN
SOLAR ELECTRIC GENERATING
SYSTEM

Docket No. 09-AFC-7C

CALIFORNIA UNIONS FOR RELIABLE ENERGY
SUPPORT OF PETITIONER'S MOTION TO REOPEN EVIDENTIARY
RECORD AND SCHEDULING ORDER

April 7, 2014

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California Unions for Reliable Energy (“CURE”) supports Palen Solar Holdings, LLC’s (“Petitioner”) Motion to Reopen Evidentiary Record and Scheduling Order for the Palen Solar Power Project (“Project”). Specifically, CURE supports Petitioner’s motion to reopen the record in the following areas:

- Biological Resources – Limited to Avian-Related Issues;
- Cultural Resources – Limited to Condition of Certification CUL-1;
- Alternatives – Limited to the Infeasibility of Project Alternatives; and
- Overriding Considerations – Limited to Project Benefits.

With respect to Petitioner’s proposed schedule, CURE generally supports the proposed schedule, with minor modifications to accommodate the Committee’s decision on this motion expected on or before April 22, 2014.

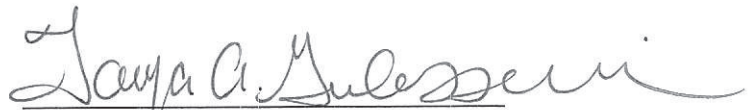
On December 23, 2013, Petitioner filed a request for a delay in the schedule, seeking to postpone submission of the Presiding Members Proposed Decision (“PMPD”) to the full commission and asking for additional time to gather evidence identified as “insufficient” in the PMPD relating to avian species, as well as to submit new data regarding project benefits. That same day, the Committee granted the request. At the January 7, 2014 Committee Conference, the Committee limited any new information to project benefits, feasibility of alternatives, impacts to avian biological resources, and mitigation of cultural resources. Petitioner subsequently filed the additional information as outlined by the Committee. Petitioner now appropriately

seeks to reopen the evidentiary record, enter this information into the record and obtain a schedule that would allow all of the parties to file supplemental opening and rebuttal testimony prior to an evidentiary hearing.

CURE requests that the Committee grant Petitioner's motion and set a revised schedule that proceeds with testimony and an evidentiary hearing.

Dated: April 7, 2014

Respectfully submitted,



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