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Project Title:	Palen Solar Power Project - Compliance		
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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

# PREHEARING CONFERENCE STATEMENT OF CALIFORNIA UNIONS FOR RELIABLE ENERGY

July 21, 2014

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Attorneys for the CALIFORNIA UNIONS FOR RELIABLE ENERGY

#### INTRODUCTION

Pursuant to section 1718.5 of the California Code of Regulations and the June 2, 2014 Revised Notice of Prehearing Conference and Evidentiary Hearing, Scheduling Order, and Further Orders, California Unions for Reliable Energy ("CURE") submits this prehearing conference statement on the Palen Solar Electric Generating System ("Project").

# 1. Topic Areas That Are Complete and Ready to Proceed to Evidentiary Hearing

All resource areas are complete and ready to proceed to evidentiary hearing.

# 2. Issues That Remain Disputed and Require Adjudication

CURE disagrees with Staff and Intervenors that the benefits of the Project do not outweigh the potential significant impacts. CURE's testimony addresses this disputed issue.

## 3. Witnesses, Topic Areas, Testimony

CURE is prepared to call William J. Perez to offer direct testimony on the economic benefits of the Project from the hours of construction and the types and number of construction skills involved. If the Committee and the Parties have no cross examination or other questions of Mr. Perez, CURE is willing to stipulate with all Parties to the admissibility of Mr. Perez's testimony, including its attached Declaration.

#### 4. CURE's List of Exhibits

CURE proposes the following exhibit:

Exhibit No.	Transaction No.	Document Title	Topic
6000	202571	Testimony of	Overriding
		William J. Perez on	Considerations
		Behalf of CURE on	
		Overriding	
		Considerations	

## 5. Scheduling Matters

If the Committee or the Parties have cross examination or questions for Mr. Perez that would require his live participation in the evidentiary hearings in Blythe, CURE requests that the Commission set a time certain for hearings on Overriding Considerations. CURE concurs with the Revised Committee Schedule issued on June 2, 2014.

### 6. Proposed Modifications to Conditions of Certification

CURE currently does not propose modifications to the Conditions of Certification. CURE reserves the right to propose such modifications at any time up to and including the close of the evidentiary hearings. CURE also reserves the right to respond to modifications to Conditions of Certification that are proposed during the remainder of the proceedings regarding the Project.

Dated: July 21, 2014 Respectfully submitted,

/s/

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