| DOCKETED | |
|------------------|---|
| Docket Number: | 19-SPPE-01 |
| Project Title: | Laurelwood Data Center (MECP Santa Clara I, LLC) |
| TN #: | 229807 |
| Document Title: | Applicant's Opposition to Petition for Intervention Helping Hand Tools (2HT) |
| Description: | N/A |
| Filer: | Deric Wittenborn |
| Organization: | Ellison Schneider Harris & Donlan LLP |
| Submitter Role: | Applicant |
| Submission Date: | 9/20/2019 12:23:01 PM |
| Docketed Date: | 9/20/2019 |

STATE OF CALIFORNIA ENERGY RESOURCES CONSERVATION AND DEVELOPMENT COMMISSION

| In the Matter of: |) | |
|-----------------------------------|---|-----------------------|
| |) | |
| Application for Small Power Plant |) | Docket No. 19-SPPE-01 |
| Exemption for the: |) | |
| |) | |
| Laurelwood Data Center |) | |

MECP1 SANTA CLARA 1, LLC'S OPPOSITION TO PETITION FOR INTERVENTION HELPING HAND TOOLS (2HT)

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September 20, 2019 Attorneys for MECP1 Santa Clara 1, LLC

STATE OF CALIFORNIA ENERGY RESOURCES CONSERVATION AND DEVELOPMENT COMMISSION

| In the Matter of: |) | |
|-----------------------------------|---|-----------------------|
| |) | |
| Application for Small Power Plant |) | Docket No. 19-SPPE-01 |
| Exemption for the: |) | |
| |) | |
| Laurelwood Data Center |) | |

MECP1 SANTA CLARA 1, LLC'S OPPOSITION TO PETITION FOR INTERVENTION HELPING HAND TOOLS (2HT)

Pursuant to Section 1211.5 of the Commission's regulations, MECP1 Santa Clara 1, LLC (the "Applicant") files this opposition to the *Petition for Intervention Helping Hand Tools (2HT)* (the "Petition") docketed on September 19, 2019.

Section 1211.7(a) of the Commission's Regulations requires that a "petition for intervention shall be filed no later than the deadline established by the presiding member." On May 31, 2019, the Committee established the deadline for intervention as August 12, 2019.

The Petition was filed well after the deadline set forth in the Committee's *Revised*Scheduling Order. Moreover, the Petition fails to allege, let alone provide, the required showing of good cause for the late filing. Accordingly, the Petition should be denied as untimely.

September 20, 2019 ELLISON SCHNEIDER HARRIS & DONLAN LLP

Jeffery D. Harris

Samantha G. Neumyer

Attorneys for MECP1 Santa Clara 1, LLC

¹ TN#: 228431. This deadline was reiterated in the Committee's subsequent scheduling order issued on August 16, 2019.