

STATE OF CALIFORNIA
California Energy Commission

DOCKET

08-AFC-12

DATE OCT 02 2009

RECD OCT 05 2009

In the Matter of:

The Application for Certification for the
San Joaquin Solar 1 and 2 Hybrid Power
Plant Project

Docket No. 08-AFC-12

CALIFORNIA UNIONS FOR RELIABLE ENERGY
REPLY TO SAN JOAQUIN SOLAR 1 AND 2, LLC'S' RESPONSE TO
CURE'S PETITION TO COMPEL PRODUCTION OF INFORMATION
IN RESPONSE TO CURE DATA REQUESTS, SET THREE

October 2, 2009

Tanya A. Gulesserian
Elizabeth Klebaner
Marc D. Joseph
Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080
(650) 589-1660 Voice
(650) 589-5062 Facsimile

Attorneys for California Unions for Reliable
Energy

On July 27, 2009, California Unions for Reliable Energy (“CURE”) served its third set of data requests on the Applicant, San Joaquin Solar 1 and 2 (“SJS”).¹ On August 17, 2009, SJS served its “Objections to Data Requests of California Unions For Reliable Energy, Set 3”.² None of SJS’s objections contained any accusations against CURE based on CURE’s status as a coalition of unions. However, its response to CURE’s petition to compel production of information contained a series of extreme accusations about CURE that have nothing to do with the merits of the data requests nor the issues that the Commission must consider in evaluating the Application.³ Since SJS makes these same accusations in its objections to CURE’s fourth set of data requests, rather than filing a series of repetitive responses, CURE will address them in a petition to compel production of information in response to set four, which will be filed by October 14, 2009.

Therefore, in the interest of administrative efficiency, CURE recommends that the Committee consolidate its decisions on CURE’s petition to compel information in response to set three and CURE’s forthcoming petition to compel information in response to set four.

¹ CURE Petition to Compel Production of Information in Response to CURE Data Requests, Set Three, September 16, 2009, Exhibit 1.

² *Id.*, Exhibit 2.

³³ *Id.*; San Joaquin Solar 1 and 2, LLCs’ Response to California Unions for Reliable Energy’s Motion to Compel Production of Information, October 1, 2009, pp. 3-6.

Dated: October 2, 2009

Respectfully submitted,

_____/s/_____
Marc D. Joseph
Tanya A. Gulesserian
Elizabeth Klebaner
Adams Broadwell Joseph & Cardozo
601 Gateway Blvd., Suite 1000
South San Francisco, CA 94080
(650) 589-1660 Telephone
(650) 589-5062 Fax

Attorneys for California Unions for Reliable
Energy

STATE OF CALIFORNIA

Energy Resources Conservation
and Development Commission

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DECLARATION OF SERVICE

I, Bonnie Heeley, declare that on October 2, 2009, I served and filed copies of the attached **CALIFORNIA UNIONS FOR RELIABLE ENERGY REPLY TO SAN JOAQUIN SOLAR 1 AND 2, LLC'S' RESPONSE TO CURE'S PETITION TO COMPEL PRODUCTION OF INFORMATION IN RESPONSE TO CURE DATA REQUESTS, SET THREE.** The original document, filed with the Docket Unit, is accompanied by a copy of the most recent Proof of Service list, located on the web page for this project at http://www.energy.ca.gov/sitingcases/sjsolar/SJSOLAR_POS.PDF. The document has been sent (1) electronically, and (2) via US Mail by depositing in the US Mail at South San Francisco, CA, with first-class postage thereon full prepaid and addressed as provided on the attached Proof of Service list to those addresses NOT marked "email preferred." It was sent for filing to the Energy Commission by sending an original paper copy and one electronic copy, mailed and emailed respectively, to the address shown on the attached Proof of Service list.

I declare under penalty of perjury that the foregoing is true and correct.
Executed at South San Francisco, California, on October 2, 2009.

_____/s/_____
Bonnie Heeley

SERVICE LIST

Kent Larson
Project Manager
12555 High Bluff Drive
San Diego, CA 92130
kent.larsen@spinnakerenergy.net

Tanya A. Gulesserian
Elizabeth Klebaner
Adams Broadwell Joseph &
Cardozo
601 Gateway Boulevard, #1000
South San Francisco, CA 94080
E-mail Preferred
tgulesserian@adamsbroadwell.com
eklebaner@adamsbroadwell.com

Robin Mayer
Staff Counsel
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814
rmayer@energy.state.ca.us

Doug Wert, Chief Operating
Officer
Martifer Renewables Solar
Thermal
12555 High Bluff Drive, Suite 100
San Diego, CA 92130
Doug.wert@spinnakerenergy.net

Julia Levin
Commissioner and Presiding
Member
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814
jlevin@energy.state.ca.us

Elena Miller
Public Advisor
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814
publicadviser@energy.state.ca.us

Ann Runnalls
URS
1615 Murray Canyon Road
Suite 1000
San Diego, CA 92108
anne_runnalls@urscorp.com

James D. Boyd
Vice Chairman and Associate
Member
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814
jboyd@energy.state.ca.us

Lisa DeCarlo
Staff Counsel
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814
ldecarlo@energy.state.ca.us

Christopher T. Ellison
Ellison, Schneider & Harris L.L.P.
2600 Capitol Avenue, Suite 400
Sacramento, CA 95816-5905
cte@eslawfirm.com

Raoul Renaud
Hearing Officer
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814
rrenaud@energy.state.ca.us

California Energy Commission
Attn: docket 08-AFC-12
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512
docket@energy.state.ca.us

Robert Joyce, Corporate Counsel
Joyce Law Group
7848 Ivanhoe Avenue
La Jolla, CA 92037
EMAIL PREFERRED
Robert_joyce@joycelawgroup.net

Joseph Douglas
Project Manager
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814
jdouglas@energy.state.ca.us

Association of Irrigated
Residents (AIR)
Tom Frantz
30100 Orange Street
Shafter, CA 93263
tfrantz@bak.rr.com

California ISO
E-mail Preferred
e-recipient@caiso.com

