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DOCKET

08-AFC-13C

DATE JUN 18 2011

RECD. JUN 20 2011

June 18, 2011

California Energy Commission
Attn: Docket No. 08-AFC-13C
1516 Ninth Street, MS-14
Sacramento, California 95814-5512
docket@energy.state.ca.us

[US MAIL & E-MAIL]

Re: Docket No. 08-AFC-13C, Calico Solar Project Amendment
Motion to Compel Production of Information

Dear Docket Clerk:

Please docket the enclosed Motion to Compel Production of Information.

I certify under penalty of perjury that all of the statements made in the following document are true, correct and complete to the best of my knowledge and belief.

Respectfully submitted,



Patrick C. Jackson

Enclosure

STATE OF CALIFORNIA

Energy Resources Conservation
and Development Commission

In the Matter of:

Calico Solar Project Amendment

Docket No. 08-AFC-13C

**MOTION TO COMPEL
PRODUCTION OF
INFORMATION**

I. FACTUAL BACKGROUND

On May 2, 2011, the Energy Commission Siting Committee (Committee) issued Committee Scheduling, Briefing, and Procedures Order (Order) permitting interested parties to propound data requests. The Order states:

The Siting Committee hereby ORDERS that data requests may be propounded only upon Calico Solar, LLC and any such requests may be propounded only after the Committee issues written findings of good cause.

The Committee, in its discretion, may limit the number of allowed data requests, scope of the data requests, and the time allocated for responding to data requests. All approved data requests shall be served by no later than 5:00 p.m. on May 31, 2011.

On May 2, 2011, the Committee granted my Petition to Intervene.

Pursuant to the Order and within the time limit set forth in the Order, on May 8, 2011, I submitted Patrick C. Jackson Data Request Set 1 (Nos. 1-23) to the Committee and requested the Committee issue a written finding of good cause.

On May 16, 2011, Kourtney Vaccaro, Hearing Officer II, notified me I “had established good cause to propound” thirteen (13) of the twenty-three (23) data requests upon Calico Solar, LLC (Calico).

As permitted under Sections 1712 and 1716 of the Commission’s regulations, I propounded Patrick C. Jackson Data Request Set 1 (Nos. 1-13) (Data Request) on May 16, 2011.

II. CALICO RESPONSE AND OBJECTIONS TO DATA REQUEST 1, 3, 4 AND 5

Calico responded twice to the Data Request: first on June 6, 2011, and then on June 15, 2011.

In its June 6, 2011, letter, Calico Solar stated that “it objects to providing certain information” for Data Request 1, 3, 4 and 5.

Here are Data Request 1, 3, 4 and 5; Calico’s Objections and my response (Response) to each Calico objection.

DATA REQUEST 1 Please provide the hydrology, hydraulic and sediment transport/ scour studies for the Modified Project AND adjacent private properties affected by the studies.

Calico’s Objection

In responding to Data Request 1, Calico states in its June 6, 2011:

These studies will not cover areas outside of the Modified Project site and Calico Solar objects to any data requests calling for such studies. The Modified Project shall not increase erosion of the desert soils or divert storm water from its current path at the site boundaries and post development sediment transport through the project site shall be equal to or less than pre-development runoff as required in the Commission’s condition of certification SOIL&WATER-8.

Response

Calico’s objection to Data Request 1 is groundless and improper.

A. Calico’s objection is groundless as the Conditions of Certification set forth in the *Commission Decision Calico Solar Power Project* (Decision) require Calico Solar to submit a Drainage, Erosion and Sedimentation Control Plan (DESCP) and the DESCP is to include adjacent properties.

1. Conditions of Certification Soil&Water-1 states, in part:

Prior to Pre-Construction Site Mobilization, the project owner shall submit for BNSF’s review, and comment as to those portions of deliverables relating to the study and requirements of **SOIL& WATER -12, a site specific Drainage, Erosion and Sediment Control Plan (DESCP) that ensures protection of:** 1) water quality and soil resources of the project site; 2) all linear features on the project site, including but not limited to maintenance, access and perimeter roads, SunCatchers, power feed lines, and hydrogen lines; 3) all other structures on the project site; and 4) adjacent

properties, including the BNSF right of way, for both the construction and operational phases of the project. Subsequent to delivery of the DESCPC to BNSF, the project owner shall deliver the DESCPC to the CPM for its review and approval. This plan shall address appropriate methods and actions, both temporary and permanent, on the project site, for the protection of water quality and soil resources, and for the protection of adjacent properties, including the BNSF right of way. [Emphasis added]

(Decision, Soil and Water Resources, p. 35)

2. Soil&Water-1 also states, in part:

The DESCPC shall contain the following elements: [. . .]

(4) Watercourses and Critical Areas: The DESCPC shall show the location of all onsite and nearby watercourses including ephemeral washes, irrigation and drainage canals, and drainage ditches, and shall indicate the proximity of those features to the project site and both sides of the BNSF right of way and other adjacent properties. [Emphasis added]

(Decision, Soil and Water Resources, pp. 37-38)

3. Condition of Certification Soil&Water-16 states, in part:

Prior to site mobilization for Phase 1a, the project owner shall obtain the CPM's approval of a site specific Drainage, Erosion and Sediment Control Plan (DESCPC) for Phase 1a that ensures protection of: 1) water quality and soil resources of the project site; 2) all linear facilities on the project site, including but not limited to, maintenance, access roads, and pedestals; 3) all other structures on the project site; and 4) adjacent properties, including the BNSF right of way. The plan shall address appropriate methods and actions, both temporary and permanent, on the project site, to meet these performance standards. [Emphasis added]

(Decision, Soil and Water Resources, p. 60)

The Conditions of Certification are clear. The DESCPC is to include adjacent properties.

B. Calico's objection is improper as it assumes facts not in evidence. Calico Solar has not completed the DESCPC which will determine if the Modified Project will "increase erosion of the desert soils or divert storm water from its current path."

DATA REQUEST 3 Please provide revised grading and drainage plans for the Modified Project AND adjacent private properties affected by the revised grading and drainage.

Calico's Objection

In responding to Data Request 3, Calico states in its June 6, 2011, letter:

Calico Solar objects to the request to provide revised grading and drainage plans for areas outside of the Modified Project. As stated in Response to Data Request #1 above, the Modified Project will not affect off-site storm water flow, drainage sediment transport or erosion. Thus, no areas outside of the Modified Project will be affected by the revised grading and drainage.

Response

Calico's objection to Data Request 3 is groundless and improper on the same grounds as set forth in the Response to Data Request 1 above. Calico's objection is improper as it assumes facts not in evidence. Calico Solar has not completed the DESCPC which will determine if the Modified Project will or "will not affect off-site storm water flow, drainage sediment transport or erosion" or if "areas outside of the Modified Project will be affected by the revised grading and drainage."

DATA REQUEST 4 Please provide letters of authorization from the adjacent property owners modifying drainage onto or off their properties.

Calico's Objection

In objecting to Data Request 4, Calico Solar states in its June 6, 2011, letter:

Calico Solar objects to this data request. As stated in Response to Data Request #1 and 3 above, the Modified Project will not modify drainage onto or off adjacent properties and thus Calico Solar will not seek any letters of authorization for drainage modification.

Response

Calico's objection to Data Request 4 is groundless and improper on the same grounds as set forth in the Response to Data Request 1 and 3 above. Calico's objection is improper as it assumes facts not in evidence. Calico Solar has not completed the DESCPC which will determine if the Modified Project will "modify drainage onto or off adjacent properties."

DATA REQUEST 5 Please provide a revised Drainage, Erosion and Sediment Control Plan (DESCPC) for the Modified Project AND adjacent private properties affected by the revised DESCPC.

Calico's Objection

In objecting to Data Request 5, Calico Solar states in its June 6, 2011, letter:

Calico Solar objects to the request to provide a revised DESC for the areas outside of the Modified Project. As stated in Response to Data Request #1 and 3 above, the Modified Project will not affect off-site storm water flow, drainage, sediment transport or erosion. Thus, no areas outside of the Modified Project will be affected by the revised DESC.

Response

Calico's objection to Data Request 5 is groundless and improper on the same grounds as set forth in the Response to Data Request 1, 3 and 4 above. Calico's objection is improper as it assumes facts not in evidence. Calico has not completed the DESC which will determine if "areas outside of the Modified Project will be affected by the revised DESC.

III. MOTION TO OVERRULE CALICO'S OBJECTIONS AND COMPEL PRODUCTION OF INFORMATION FOR DATA REQUEST 1, 3, 4 AND 5

Pursuant to Sections 1712 and 1716 of the Commission regulations, I request the Committee overrule each of Calico's objections to Data Request 1, 3, 4 and 5 on the following grounds.

1. The Siting Committee "established good cause to propound" the data request. (Kourtney Vaccaro May 16, 2011 e-mail to Patrick C. Jackson)
2. The Modified Project is significantly different than the Approved Project and the Petition to Amend Calico Solar Project (Amendment) requires Calico to provide information on "the potential to impact water resources." Section 4.5.1 of the Amendment states:

Characteristics of the Modified Project that have the potential to impact water resources differently than the Approved Project include the following:

- replacement of a majority of the SunCatchers with PV modules (coverage, orientation, location, spacing and size of posts);
 - addition of inverter pads;
 - grading configuration and disturbance;
 - number and types of access roads; and
 - relocation of the main services complex and on-site substation south of the railroad. [emphasis added]
3. The Amendment requires Calico Solar to prepare hydrology, hydraulic, and sediment transport/scour studies including a Drainage, Erosion and Sediment Control Plan (DESC) for the Modified Project. In Section 4.5.2.1, the Amendment states in part:

Hydrology, hydraulic, and sediment transport/scour analyses will be prepared to reflect effects of the movement of stormwater under the Modified Project. These reports will quantify the hydrologic, hydraulic, and sediment transport/scour conditions for existing (without Project) and proposed (Modified Project) conditions, and will assess any need for debris/sediment basins. These reports will also quantify the effects of the Modified Project on hydrology, hydraulics, and erosion/sedimentation on-site and at the railroad and BNSF ROW, and draft versions of the reports will be submitted to the CPM and BNSF for review and comment.

4. Section 1769(a)(1)(I) of the California Energy Commission's *Rules of Practice and Procedure Power Plant Site Certification and Designation of Transmission Corridor Zones* (Rules of Practice and Procedure) requires the Amendment to determine the Project's "potential effect on nearby property owners." Section 1769(a)(1)(I) states:

§ 1769. Post Certification Amendments and Changes.

(a) Project Modifications

(1) After the final decision is effective under section 1720.4, the applicant shall file with the commission a petition for any modifications it proposes to the project design, operation, or performance requirements. The petition must contain the following information: [. . .]

(I) A discussion of the potential effect on nearby property owners, the public and the parties in the application proceedings. [Emphasis added]

5. The Conditions of Certification of the *Commission Decision Calico Solar Power Project* (Decision) requires Calico Solar to submit a Drainage, Erosion and Sedimentation Control Plan (DESCP) and the plan is to include adjacent properties.
6. The Data Request are reasonably calculated to lead to the discovery of admissible evidence.

Pursuant to Sections 1712 and 1716 of the Commission regulations, I request the Committee direct Calico to produce the information propounded by Data Request 1, 3, 4 and 5.

IV. CALICO RESPONSE AND OBJECTION TO DATA REQUEST 12(b)

In its June 6, 2011, letter, Calico states that "it objects to providing certain information" for Data Request 12(b).

DATA REQUEST 12(b) Page C.15-18 of the SSA states in part, "To minimize potential exposure of workers and also the public to coccidioidomycosis during soil excavation and grading, extensive wetting of the soil

prior to and during construction activities should be employed and dust masks should be worn at certain times during these activities.”

- (b) Please describe how and when the adjacent property owners will be provided dust masks and trained to use the masks.

Calico’s Objection

In objecting to Data Request 12(b), Calico states in its June 6, 2011, letter:

Calico Solar objects to this data request. Calico Solar does not intend to provide dust masks to adjacent property owners. Neither the conditions of certification for the Approved Project nor the conditions of certification for the Modified Project require Calico Solar to provide dust masks to adjacent property owners. WORKER SAFETY-9 requires that *site workers* use dust masks whenever visible dust is present. [Emphasis in text]

Response

Calico objection to Data Request 12(b) is groundless as Calico Solar has not completed any “analysis regarding the potential exposure risk to the public of contracting Valley Fever as a result of the proposed project activities.” Calico’s objection is also unfair and discriminatory as Calico Solar acknowledges the “potential exposure of workers and also the public to coccidioidomycosis during soil excavation and grading” but “does not intend” to take steps to minimize the exposure risk to the public, visitors to the site and adjacent properties, or BNSF employees.

V. MOTION TO OVERRULE CALICO SOLAR’S OBJECTION TO DATA REQUEST 12(b) AND PRODUCE INFORMATION PROPOUNDED BY DATA REQUEST 12(b)

I request the Siting Commission overrule Calico’s objection to Data Request 12(b) on two grounds:

1. Calico Solar’s operation of the Project could pose a health and safety hazard on the public, adjacent property owners and BNSF employees.
2. Data Request 12(b) is necessary for the Commission to comply with Section 25532 of the Public Resources Code which states:

The commission shall establish a monitoring system to assure that any facility certified under this division is constructed and is operating in compliance with air and water quality, public health and safety, and other applicable regulations, guidelines, and

conditions adopted or established by the commission or specified in the written decision on the application. In designing and operating the monitoring system, the commission shall seek the cooperation and assistance of the State Air Resources Board, the State Water Resources Control Board, the Department of Health, and other state, regional, and local agencies which have an interest in environmental control.

Pursuant to Sections 1712 and 1716 of the Commission regulations, I request the Committee direct Calico to produce the information propounded by Data Request 12(b).

VI. REQUEST FOR PHYSICIAN-PATIENT PRIVILEGED INFORMATION

In responding to Data Request 11, Calico Solar states in its June 6, 2011, letter:

In his Data Request Set 1, Mr. Jackson states that in September 2010, he became very ill and in January 2011 was diagnosed as having contracted Valley Fever. Mr. Jackson also states that he has reason to believe that he contracted Valley Fever when he visited his property located near the Project during Calico Solar's soil disturbing activities and geotechnical excavations. If Mr. Jackson would provide Calico Solar with information about his diagnosis, Calico Solar believes that it would be able to conduct a more complete analysis of the impact soil disturbance at the project site may have on dispersing *Coccidioides*. In particular, it would be helpful if Mr. Jackson provided more detailed information on his symptoms, his diagnosis and his course of treatment, as well as the dates on which he believes that he contracted Valley Fever. [Emphasis in text]

Response

Calico's request for information about my symptoms, diagnosis and treatment is effectively a data request not permitted pursuant to the Siting Committee's Order. The Order states:

The Siting Committee hereby **ORDERS** that data requests may be propounded only upon Calico Solar, LLC and any such requests may be propounded only after the Committee issues written findings of good cause. [Emphasis added]

I object to Calico's data request on the grounds:

1. I am not Calico Solar and the Committee has not issued written findings of good cause on Calico Solar's data request.
2. Calico's data request calls for physician-patient privileged information.
3. Calico's data request is it not relevant to soil studies conducted in a scientific and professional manner.

4. Calico's data request will not lead to a "more complete analysis of the impact soil disturbance at the project site may have on dispersing *Coccidioides*."

Without waiving these objections, I provide the following information:

Symptoms - Symptoms included continuing cough; shortness of breath; high fever; fatigue; rash on lower abdomen, thighs and upper buttocks; loss of appetite; weight loss; night sweats; elevated PSA; confusion; lung mass and nodules; and pneumonia.

Treatment - Treatment included physician visits, examinations and consultations; blood and urine tests; chest X-rays; computerized axial tomography scans (CT-CAT SCANS); CT-Guided lung biopsy; Coccidioidal Serology Reports; Cystourethroscopy with biopsy; EKG; cystoscopies and follow-up physician examinations and consultations.

Diagnosis - Coccidioidomycosis confirmed by biopsy and cultures.

I believe I contracted Valley Fever when I visited my property on or about November 8, 2009; November 15, 2009; March 28, 2010 and/or April 11, 2010.

VII. CALICO'S RESPONSE TO DATA REQUEST 9

In a letter dated June 15, 2011, Calico responded to Data Request 9.

DATA REQUEST 9 *Coccidioides* arthroconidia can be dispersed by wind. Please provide the wind data from the Project's meteorological station.

Calico's Response

Calico Solar responded in its June 15, 2011, letter by stating:

Response: Enclosed is a disc containing the surface meteorological data from the Barstow Airport National Weather Service Station, the closest long-term meteorological station to the Project site, for the calendar year 2005. These data are in AERMOD (atmospheric dispersion modeling system) surface format and were used for the air quality and public health modeling of the Original Project and the Modified Project. The MDAQMD and CEC agreed that the 2005 Barstow Daggett meteorological data were representative of the meteorological conditions at the Calico site and that these data were appropriate for use in the air quality and public health analyses. Also, the enclosed disc contains windrose plots and tables summarizing these data (in PDF).

Response

Calico's response is effectively an objection as it does not provide data from the Project's

meteorological station.

The record is clear:

- A. The Applicant installed a meteorological station on private land near the Project in the last half of 2009 and the station was expanded in the summer of 2010 after the Applicant's filed its Application for Certification on December 2, 2008.
- B. The Amendment does not mention the Project's meteorological station.
- C. The Barstow Airport National Weather Service Station is over 18 miles from the Project.
- D. Barstow Daggett meteorological data is dated.
- E. The Project is unique in its geographical and environmental setting.

VIII. MOTION TO COMPEL PRODUCTION OF INFORMATION PROPOUNDED BY DATA REQUEST 9

Pursuant to Sections 1712 and 1716 of the Commission regulations, I request the Committee direct Calico Solar to produce information propounded by Data Request 9 on the following grounds.

- 1. Barstow Daggett meteorological data is general, dated and distant whereas data from the Applicant's meteorological station is material, recent and site specific.
- 2. Data Request 9 is reasonably calculated to lead to the discovery of admissible evidence.

IX. CERTIFICATION

I certify under penalty of perjury that all of the statements made in this motion are true, correct and complete to the best of my knowledge and belief.

June 18, 2011

Date



Patrick C. Jackson
Intervenor & Private Property Owner

STATE OF CALIFORNIA
Energy Resources Conservation
and Development Commission

In the Matter of:

Docket No. 08-AFC-13C

Calico Solar Project Amendment

DECLARATION OF SERVICE

I, **Patrick C. Jackson**, declare that on **June 18, 2011**, I served and filed copies of the attached *Motion to Compel Production of Information*. The original document, filed with the Docket Unit, is accompanied by a copy of the most recent *Proof of Service* located on the web page for this project at:

<http://www.energy.ca.gov/sitingcases/calicosolar/>

The document has been sent to the Commission, as well as all parties in this proceeding as shown on the *Proof of Service*, in the following manner:

FOR SERVICE TO THE APPLICANT AND ALL OTHER PARTIES:

- XX sent electronically to all e-mail addresses on the Proof of Service list and
XX by depositing in the United States mail at **San Dimas, California**, with first-class postage thereon fully prepaid and addressed as provided on the attached *Proof of Service* to the mailing addresses shown on the Proof of Service NOT marked "E-mail Service Preferred."

AND

FOR FILING WITH THE ENERGY COMMISSION:

- XX sending the original signed document and one electronic copy, mailed and e-mailed respectively, to the address below:

CALIFORNIA ENERGY COMMISSION
Attn: Docket No. **08-AFC-13C**
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512
docket@energy.state.ca.us

I declare under penalty of perjury that the foregoing is true and correct.

June 18, 2011

Date



Patrick C. Jackson



BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT
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1516 NINTH STREET, SACRAMENTO, CA 95814
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**FOR THE CALICO SOLAR PROJECT
AMENDMENT**

**Docket No. 08-AFC-13C
PROOF OF SERVICE
(Revised 6/7/2011)**

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