

STATE OF CALIFORNIA
California Energy Commission

DOCKET	
11-CAI-02	
DATE	SEP 09 2011
RECD.	SEP 09 2011

In the Matter of Complaint Against

ORMAT NEVADA, INC. BROUGHT BY
CALIFORNIA UNIONS FOR
RELIABLE ENERGY

Docket No. 11-CAI-02

**CALIFORNIA UNIONS FOR RELIABLE ENERGY
PETITION FOR INSPECTION AND COPYING OF RECORDS
PROVIDED BY ORMAT NEVADA, INC.**

September 9, 2011

Tanya A. Gulesserian
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
tgulesserian@adamsbroadwell.com

Attorneys for the CALIFORNIA
UNIONS FOR RELIABLE ENERGY

I. INTRODUCTION

Pursuant to section 2506 of Title 20 of the California Code of Regulations, California Unions for Reliable Energy (“CURE”) petitions for inspection and copying of certain materials submitted by Ormat Nevada, Inc. (“Ormat”). These materials were submitted in response to data requests from Terrance O’Brien dated August 15, 2011.¹ CURE seeks to review the requested records to enable CURE to evaluate whether the East and North Brawley Geothermal Projects (“Projects”) are subject to Energy Commission jurisdiction – an issue which the Commission says CURE has the burden of proving.² CURE also seeks to review the materials to enable CURE to provide fully informed testimony and cross-examination of witnesses regarding jurisdiction. Although not required, CURE contacted counsel for Ormat on September 8, 2011 in an effort to expeditiously obtain the documents.³ CURE has not, to date, received a response.

CURE is not a competitor, nor power plant developer. Therefore, release of the confidential information to CURE would not place Ormat at a competitive disadvantage. In order to maintain confidentiality, CURE proposes to enter into a standard nondisclosure agreement with Ormat. A proposed nondisclosure agreement is attached as Exhibit A.

¹ Letter from Samantha G. Pottenger, Attorney for ORMAT Nevada, Inc., to Robert Oglesby, CEC Executive Director, Subject: ORMAT Nevada, Inc. Application for Confidential Designation in Response to Staff Requests for Information Dated August 15, 2011 (11-CAI-02) (September 2, 2011).

² Notice of Prehearing Conference and Evidentiary Hearing, August 19, 2010 (Docket No. 11-CAI-02), p. 3.

³ Tanya Gulesserian telephone messages to Christopher T. Ellison and Samantha G. Potter, September 8, 2011.

CURE's petitions for inspection of confidential records were granted and readily agreed to by the applicant in the Beacon Solar Energy Project proceeding⁴ and Genesis Solar Energy Project proceeding, respectively. The Committee, in the Beacon case, found good cause for the petition and ordered the production of documents upon presentation of a fully executed non-disclosure agreement between CURE and the applicant. The same decision should be reached here.

II. DISCUSSION

On June 30, 2011, CURE filed a Verified Complaint and Request for Investigation ("Complaint") requesting that the Commission investigate whether Ormat violated State law by circumventing the Commission's jurisdiction over the Projects.⁵ On July 26, 2011, the Chairman of the Commission found good cause for the Commission to serve the Complaint on Ormat, ordered Ormat to file an Answer and directed Staff to prepare an assessment within seven days of receiving the Answer.

On August 15, 2011, Terrance O'Brien sent a letter to Ormat requesting information regarding the Projects' generating capacity.⁶

Mr. O'Brien requested that Ormat provide a written response by September 2, 2011. On August 29, 2011, Ormat filed an Answer to the

⁴ Committee Order Granting CURE's Petition for Inspection and Copying of Records, In the Matter of the Application for Certification for the Beacon Solar Energy Project, Docket No. 08-AFC-2 (November 16, 2009).

⁵ Verified Complaint Verified Complaint and Request for Investigation ("Complaint") against Ormat Nevada Inc., Docket No. 11-CAI-02 (June 30, 2011).

⁶ Letter from Terrence O'Brien, Deputy Director, CEC to Charlene Wardlow, Director of Business Development, Ormat dated August 15, 2011.

Complaint containing Ormat's conclusions regarding the Commission's jurisdiction over the facilities.⁷

Unbeknownst to CURE, instead of docketing and serving written responses to Mr. O'Brien's data requests, Ormat met with Staff on September 2, 2011.⁸ According to Staff, "Staff has more follow-up questions for Ormat" and "expects to receive additional clarification within a week."⁹ Staff did not provide notice to CURE regarding the September 2nd meeting, and Ormat did not serve any documents on CURE.

On September 6, 2011, CURE sent an email to Staff to determine whether Staff received responses to its data requests.¹⁰ In response, Staff explained that Ormat "provided some engineering information regarding their potential capacity."¹¹ CURE then submitted a formal request for "a copy of any documents, including correspondence, submitted to the Commission (and/or Staff) by Ormat in this proceeding that have not been docketed."¹²

On the evening of that same day, Jeffry Ogata, Assistant Chief Counsel, sent an email to CURE that Staff would send the requested documents, but that "**some** of the docs we received last Friday were

⁷ Verified Answer of Respondent Ormat Nevada, Inc. to Verified Complaint and Request for Investigation by California Unions for Reliable Energy, Docket 11-CAI-02 (August 29, 2011).

⁸ Energy Commission Staff's Assessment of Complaint and Answer, September 6, 2011 (Docket No. 11-CAI-02).

⁹ Id. at p. 1.

¹⁰ Email from Tanya Gulesserian to Bob Worl, Subject: 11-CAI-02, dated September 6, 2011.

¹¹ Id.

¹² Email from Tanya Gulesserian to Bob Worl, Subject: 11-CAI-02, dated September 6, 2011.

submitted with a request for confidentiality.”¹³ Mr. Ogata also explained that “[o]nce we are able to separate out the disclosable documents, we will send them to you as soon as possible” and recommended contacting Ormat’s counsel directly.¹⁴ CURE contacted counsel directly on September 8, 2011 but, to date, has received neither disclosable, nor confidential documents from either Staff or Ormat.

Mr. Ogata then provided Ormat’s application for confidential designation of documents, which Ormat failed to serve on CURE.

Ormat’s application seeks confidential designation of the following documents submitted in response to Mr. O’Brien’s August 15, 2011 data requests:

1. North Brawley Geothermal Power plant Heat and Mass Balance Diagram;
2. East Brawley Geothermal Power Plant Heat and Mass Balance Diagram;
3. North Brawley Conceptual Geofluid Process Flow Diagrams;
4. North Brawley CW Pump Information;
5. ORMAT Hydraulic Analysis;
6. ORMAT HEBER II Optimization Project Brushless Synchronous Generator Specifications;
7. Cooling Tower Institute Specifications for Mechanical Draft Cooling Tower;
8. Data Sheet Synchronous Machines;

¹³ Email from Jeffrey Ogata to Tanya Gulesserian, Subject: 11-CAI-02, dated September 6, 2011.

¹⁴ Id.

9. ORMAT Heat Exchanger Specification Sheets; and
10. Power Purchase Agreement (“PPA) between ORNI 18, LLC and Southern California Edison.¹⁵

Due to the lack of notice regarding Staff’s meeting with Ormat, Ormat’s failure to serve written responses on all parties and Ormat’s failure to serve its application for confidential designation, CURE only began learning about the exchange of information two days ago.

Ormat requested confidential designation for these documents on the ground that the information contains “trade secrets”.¹⁶ Ormat stated that the documents provide “detailed, project-specific information regarding the project layouts, proprietary generator information, and project design” and that “[s]uch information provides valuable information to competitors regarding Ormat’s proprietary generator design information or plant layout.”¹⁷ Ormat also stated that disclosure “could cause a loss of competitive advantage to Ormat in negotiations for project equipment, or if used by competitors to evaluate pricing.”¹⁸ As such, Ormat requested that the information be designated as confidential.

Whether or not Ormat’s assertions about the confidential nature of these materials is correct, CURE is willing to treat the documents as confidential. CURE petitions to inspect and copy these documents in order to

¹⁵ Letter from Samantha G. Pottenger and Christopher T. Ellison, Attorneys for Ormat Nevada, Inc. to Robert Oglesby, Executive Director, California Energy Commission, Re: ORMAT Nevada, Inc. Application for Confidential Designation in Responses to Staff Requests for Information Dated August 15, 2011 (11-CAI-02), dated September 2, 2011.

¹⁶ *Id.*, pp. 2-3 (unnumbered pages).

¹⁷ *Id.*

¹⁸ *Id.*

make a good faith effort to expeditiously obtain the information necessary to enable CURE to evaluate whether the Projects are subject to Commission jurisdiction. Disclosing the requested documents to CURE will not create a competitive advantage, because CURE is not a power plant developer. CURE is a coalition of unions whose members construct and operate power plants in California. CURE filed the Complaint because the Projects directly affect the union members' economic and environmental interests.¹⁹ Specifically here, under-examined and piecemealed environmental review could result in undisclosed impacts on air quality and public health, water resources and biological resources, among others, and from hazards and hazardous materials and may reduce the environmental carrying capacity of the state. This reduces future employment opportunities. In contrast, well designed and fully analyzed projects that reduce environmental impacts of electricity generation improve long-term economic prospects. CURE's ability to exercise its rights as a party is dependent on thorough review of the assumptions and analyses provided by Ormat.

CURE's petition is consistent with the Committee's schedule, which expedites review of the jurisdictional issue.²⁰

To maintain confidentiality of the documents, CURE proposes to enter into a standard nondisclosure agreement with Ormat. The purpose of the

¹⁹ Verified Complaint Verified Complaint and Request for Investigation ("Complaint") against Ormat Nevada Inc., Docket No. 11-CAI-02 (June 30, 2011), pp. 3-4.

²⁰ Notice of Prehearing Conference and Evidentiary Hearing, August 19, 2010 (Docket No. 11-CAI-02), pp. 4-5.

nondisclosure agreement is to ensure that the requested materials will remain confidential and will not be used, except as necessary, to participate in the proceeding. CURE's counsel and consultants have routinely been parties to nondisclosure agreements in CPUC and Commission proceedings and are experienced at protecting confidential, highly market sensitive information from public disclosure.

III. CONCLUSION

Because CURE is not a competitor, power plant developer and is willing to enter into a non-disclosure agreement with Ormat, CURE requests that the Commission grant CURE's petition to inspect and copy the documents listed in Ormat's September 2, 2011 Application for Confidential Designation. The requested information is necessary for CURE to fully exercise its rights as a party in this proceeding.

Dated: September 9, 2011

Respectfully submitted,

/s/

Tanya A. Gulesserian
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
tgulesserian@adamsbroadwell.com

Attorneys for the CALIFORNIA UNIONS
FOR RELIABLE ENERGY

EXHIBIT A

STATE OF CALIFORNIA

California Energy Commission

In the Matter of Complaint Against

ORMAT NEVADA, INC. BROUGHT BY
CALIFORNIA UNIONS FOR
RELIABLE ENERGY

Docket No. 11-CAI-02

**NON-DISCLOSURE AGREEMENT REGARDING
CONFIDENTIALITY OF ORMAT NEVADA, INC.
DOCUMENTS**

1. This Non-Disclosure Agreement (NDA) is entered into between Ormat Nevada, Inc. (Ormat) and California Unions for Reliable Energy (CURE, as defined below). This NDA shall govern access to and the use of all Confidential Records of Ormat in California Energy Commission (Commission or CEC) Docket No. 11-CAI-02. Notwithstanding any order terminating this docket, this NDA shall remain in effect unless lifted by Ormat pursuant to paragraph 12 below.

2. Definitions –

- a. The term “Projects” shall mean the East and North Brawley Geothermal Projects as described in Docket 11-CAI-02.
- b. The term “redacted” refers to situations in which confidential or proprietary information in a document, whether the document is in paper or electronic form, has been covered, masked or blocked out. The term “un-redacted” refers to situations in which confidential or proprietary information in a document, whether in paper or electronic form, has not been covered, masked or blocked out.
- c. The term “Confidential Records” means the confidential or proprietary information contained in documents listed in Letter from Samantha G. Pottenger and Christopher T. Ellison, Attorneys for Ormat Nevada, Inc. to Robert Oglesby, Executive Director, California Energy Commission, Re: Ormat Nevada, Inc. Application for Confidential Designation in Responses to Staff Requests for Information Dated August 15, 2011 (11-CAI-02), dated September 2, 2011.
- d. “Confidential Records” shall also include: (A) any information

contained in or obtained from the materials described in the preceding paragraph; (B) any testimony requested to be treated as confidential by Ormat and filed in Docket No. 11-CAI-02; (C) any other materials that are made subject to this NDA by the Commission, the Committee, or any designee of such, pursuant to applicable regulations, or by any court or other body having appropriate authority. Ormat, when creating any Confidential Records, shall physically mark such records on each page (or in the case of non-documentary materials such as computer diskettes, on each item) as “CONFIDENTIAL RECORDS,” or with words of similar import as long as one or more of the terms “Confidential Records” or “Confidential” is included in the designation to indicate that the materials in question are Confidential Records.

Confidential Records shall not include: (A) any information or document contained in the public files of the CEC or any other state or federal agency, or in any state or federal court, unless such information or document has been determined to be protected by such agency or court; or (B) information that is public knowledge, or which becomes public knowledge, other than through disclosure in violation of this NDA.

- e. The term “Non-Disclosure Certificate” shall mean the certificate annexed as Appendix A by which persons shall be granted access to the Confidential Records. Such persons shall, as a condition of such access, certify their understanding that such access is provided pursuant to the terms and restrictions of this NDA, and that such persons have read such NDA and agree to be bound by it. All Non-Disclosure Certificates shall be sent to and retained by Ormat.
- f. The term CURE shall refer to California Unions for Reliable Energy. By executing this NDA, CURE represents (1) that it is not an entity that engages in the supply of power plant products, or an association comprised of entities that engage in such activities, or any affiliate of such an entity or association; (2) that it is not an entity engaged in the activities related to submitting bids or negotiation of power supply or sales contracts relating to the sale or purchase of power, energy or electricity or the sale or purchase of power generating or storage assets; and (3) that it is not an entity engaged in consulting or advising other entities on the supply of power plant projects or submitting bids or negotiation of contracts.
- g. The term “CURE Reviewing Representative” shall mean a person who is
 - 1. An officer of CURE whose duties involve assisting CURE in

preparing for or participating in Docket 11-CAI-02; or an attorney, paralegal, consultant or employee of a consultant retained by CURE for the purpose of advising, preparing for or participating in Docket 11-CAI-02; and

2. Approved by Ormat pursuant to the following process:
 - a. CURE shall identify its proposed Reviewing Representatives to Ormat.
 - b. Upon request by Ormat, CURE shall provide a curriculum vitae of any particular candidate.
 - c. Ormat shall advise CURE in writing if Ormat objects to any proposed Reviewing Representative, setting forth in detail the reasons therefore.

Access of CURE Reviewing Representatives to Confidential Records shall be granted only pursuant to the terms of this NDA.

3. Confidential Records shall be treated as confidential by each CURE Reviewing Representative in accordance with the certificate executed pursuant to this NDA. Confidential Records shall not be used except as necessary for the conduct of Docket No. 11-CAI-02, and shall not be disclosed in any manner to any person except other CURE Reviewing Representatives who are engaged in this proceeding and need to know the information in order to carry out their responsibilities or as provided by the CEC.

4. In the event CURE is requested or required by applicable laws or regulations, or in the course of administrative or judicial proceedings (in response to oral questions, interrogatories, request for information or documents, subpoena, civil investigative demand or similar process) to disclose any Confidential Records, CURE agrees to oppose disclosure on the grounds that the requested information has been designated as Confidential Records subject to this NDA and therefore may not be disclosed. CURE shall also immediately inform Ormat of the request, and Ormat may, at its sole discretion and cost, direct any challenge or defense against the disclosure requirement, and CURE shall cooperate with Ormat to the maximum extent practicable to either oppose the disclosure of the Confidential Records consistent with applicable law, or obtain confidential treatment of Confidential Records by the entity that wishes to receive the Confidential Records prior to any such disclosure.

5. It shall be a rebuttable presumption that (i) any study that incorporates, describes or otherwise employs Confidential Records in a manner that could reveal any part of the Confidential Records, or (ii) any model that relies upon Confidential Records for algorithms or other computation(s) critical to the

functioning of the model, shall also be considered Confidential Records subject to this NDA. However, models that merely use Confidential Records as inputs will not themselves be considered Confidential Records. It shall also be a rebuttable presumption that where the inputs to studies or models include Confidential Records, or where the outputs of such studies or models reveal such inputs or can be processed to reveal the Confidential Records, such inputs and/or outputs shall be considered Confidential Records subject to this NDA, unless such inputs and/or outputs have been redacted or aggregated to the satisfaction of Ormat. Unless the Commission, Committee, or Designee issues a ruling holding that the applicable presumption(s) from among the foregoing has been rebutted with respect to the model or study at issue, then any model or study devised or performed by CURE that incorporates, uses or is based upon Confidential Records shall also be Confidential Records subject to the terms of this NDA.

6. No CURE Reviewing Representative shall be permitted to inspect, participate in discussions regarding, or otherwise be granted access to Confidential Records pursuant to this NDA unless such CURE Reviewing Representative has first executed a Non-Disclosure Certificate and it has been delivered to Ormat. Upon request, Ormat shall provide copies of executed Non-Disclosure Certificates to Commission Staff. Attorneys qualified as CURE Reviewing Representatives shall ensure that persons under their supervision or control comply with this NDA.

7. In the event that a CURE Reviewing Representative to whom Confidential Records are disclosed ceases to be engaged in proceedings in this docket, then access to Confidential Records by that person shall be terminated. Even if no longer engaged in such proceedings, every such person shall continue to be bound by the provisions of this NDA and the Non-Disclosure Certificate.

8. All documents containing Confidential Records that are filed with the Commission or served shall be placed in sealed envelopes or otherwise appropriately protected and shall be endorsed to the effect that they are filed or served under seal pursuant to this NDA. Such documents shall be marked with the words “**CONFIDENTIAL RECORDS**” or one of the other, similar terms set forth in paragraph 2.d hereof, and shall be served upon all CURE Reviewing Representatives and persons employed by or working on behalf of the CEC who are eligible to see the Confidential Records.

9. Nothing in this NDA shall be construed as limiting the right of Ormat or CURE from objecting to the use of Confidential Records on any legal ground, such as relevance or privilege.

10. All Confidential Records filed with judicial or administrative bodies other than the Commission, whether in support of or as part of a motion, brief or other document or pleading, shall be filed and served in sealed envelopes or other

appropriate containers bearing prominent markings indicating that the contents include Confidential Records that are subject to this NDA.

11. Neither Ormat nor CURE waives its rights to pursue any other legal or equitable remedy that may be available in the event of actual or anticipated disclosure of Confidential Records.

12. Ormat may agree at any time to remove the “Confidential Records” designation from any material if, in Ormat’s sole opinion, its confidentiality is no longer required. In such a case, Ormat will notify CURE of the change of designation.

13. Review of and use of the Confidential Records by CURE and any CURE Reviewing Representative is solely for the purpose of participating in Docket 11-CAI-02 and any other use or disclosure of the Confidential Records is a breach of this NDA.

Dated September _____, 2011, at South San Francisco, California.

BY: _____
On Behalf of Ormat Nevada, Inc.

BY: _____
On Behalf of California Unions
for Reliable Energy

APPENDIX A

STATE OF CALIFORNIA

California Energy Commission

In the Matter of Complaint Against

ORMAT NEVADA, INC. BROUGHT BY
CALIFORNIA UNIONS FOR
RELIABLE ENERGY

Docket No. 11-CAI-02

I, _____, have been asked by _____
(California Unions for Reliable Energy (CURE)) to inspect certain materials
that have been designated as “Confidential Records” under Paragraph 2 of
the Non-Disclosure Agreement (NDA) entered into between Ormat Nevada,
Inc. (Ormat) and CURE dated _____, 2011.

1. I hereby certify my understanding that access to Confidential
Records is provided to me pursuant to the terms and restrictions of the NDA,
that I have been given a copy of and have read the NDA, and that I agree to
be bound by it. I understand that the contents of the Confidential Records,
any notes or other memoranda, or any other form of information that copies
or discloses Confidential Records shall not be disclosed to anyone other than
in accordance with the NDA.

2. I understand that my review of Confidential Records is solely for
the purpose of participating in the above-captioned matter and that any other
use or disclosure of Confidential Records by me is a violation of the NDA.

3. I hereby agree to submit to the exclusive jurisdiction of the
California Energy Commission for the enforcement of the undertakings I
have made hereby and I waive any objection to venue laid with the
Commission for enforcement of the Order.

Dated: _____

BY: _____

TITLE: _____

REPRESENTING: _____

DECLARATION OF SERVICE

I, Valerie Stevenson, declare that on, September 9, 2011, I served and filed copies of the attached **CALIFORNIA UNIONS FOR RELIABLE ENERGY PETITION FOR INSPECTION AND COPYING OF RECORDS PROVIDED BY ORMAT NEVADA, INC.**, dated September 9, 2011. The original document, filed with the Docket Unit or the Chief Counsel, as required by the applicable regulation, 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/proceedings/11-cai-02/index.html>.

The document has been sent to the other parties in this proceeding (as shown on the Proof of Service list) and to the Commission's Docket Unit or Chief Counsel, as appropriate, in the following manner:

(Check all that Apply)

For service to all other parties:

- √ Served electronically to all e-mail addresses on the Proof of Service list;
- √ Served by delivering on this date, either personally, or for mailing with the U.S. Postal Service with firstclass postage thereon fully prepaid, to the name and address of the person served, for mailing that same day in the ordinary course of business; that the envelope was sealed and placed for collection and mailing on that date to those addresses **NOT** marked "email service preferred."

AND

For filing with the Docket Unit at the Energy Commission:

- √ by sending an original paper copy and one electronic copy, mailed with the U.S. Postal Service with first class postage thereon fully prepaid and e-mailed respectively, to the address below (preferred method);

OR

by depositing an original and 12 paper copies in the mail with the U.S. Postal Service with first class postage thereon fully prepaid, as follows:

CALIFORNIA ENERGY COMMISSION – DOCKET UNIT
Attn: Docket No. 11-CAI-02
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512
docket@energy.state.ca.us

OR, if filing a Petition for Reconsideration of Decision or Order pursuant to Title 20, § 1720:

Served by delivering on this date one electronic copy by e-mail, and an original paper copy to the Chief Counsel at the following address, either personally, or for mailing with the U.S. Postal Service with first class postage thereon fully prepaid:

California Energy Commission
Michael J. Levy, Chief Counsel
1516 Ninth Street MS-14
Sacramento, CA 95814
mlevy@energy.state.ca.us

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, that I am employed in the county where this mailing occurred, and that I am over the age of 18 years and not a party to the proceeding.

/s/
Valerie Stevenson



**BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT
COMMISSION OF THE STATE OF CALIFORNIA
1516 NINTH STREET, SACRAMENTO, CA 95814
1-800-822-6228 – WWW.ENERGY.CA.GOV**

***IN THE MATTER OF COMPLAINT AGAINST
ORMAT NEVADA, INC. BROUGHT BY
CALIFORNIA UNIONS FOR RELIABLE ENERGY***

**Docket No. 11-CAI-02
(Revised 8/19/11)**

RESPONDENT

*Ormat Nevada, Inc.
6225 Neil Road
Reno, NV 89511

COUNSEL FOR RESPONDENT

*Christopher T. Ellison
Samantha Pottenger
Ellison, Schneider and Harris, LLP
2600 Capitol Avenue, Suite 400
Sacramento, CA 95816
cte@eslawfirm.com
sgp@eslawfirm.com

COMPLAINANT

California Unions for Reliable Energy
c/o Adams Broadwell Joseph
& Cardozo
Marc D. Joseph
Tanya A. Gulesserian
Elizabeth Klebaner
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080
mjoseph@adamsbroadwell.com
tgulesserian@adamsbroadwell.com
eklebaner@adamsbroadwell.com

**INTERESTED
AGENCIES/ENTITIES/PERSONS**

Imperial County Planning and
Development Services
801 Main Street
El Centro, CA 92243

Imperial County Air Pollution
Control District
150 South 9th Street
El Centro, CA 92243-2801

Imperial Irrigation District
333 E. Barioni Boulevard
Imperial, CA 92251

**ENERGY COMMISSION
DECISIONMAKERS**

ROBERT B. WEISENMILLER
Chair and Associate Member
rweisenm@energy.state.ca.us

KAREN DOUGLAS
Commissioner and Presiding Member
kldougl@energy.state.ca.us

Kenneth Celli
Hearing Officer
kcelli@energy.state.ca.us

**ENERGY COMMISSION
CHIEF COUNSEL**

Michael J. Levy
Chief Counsel
e-mail service preferred
mlevy@energy.state.ca.us

ENERGY COMMISSION STAFF

*Bob Worl
Project Manager
rworl@energy.state.ca.us

*Jeff Ogata
Assistant Chief Counsel
jogata@energy.state.ca.us

**ENERGY COMMISSION
PUBLIC ADVISER**

Jennifer Jennings
Public Adviser
e-mail service preferred
[*publicadviser@energy.state.ca.us](mailto:publicadviser@energy.state.ca.us)