

## BRIGGS LAW CORPORATION

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*BLC File(s): 1725.01*

October 30, 2012

Quail Brush Genco, LLC  
Ms. Lori Zeibart  
Project Manager  
9405 Arrowpoint Blvd.  
Charlotteville, NC 28273

Re: Quail Brush Generation Project (11-AFC-3), Sunset Green's Data  
Requests Set Two no. 53-54

Dear Ms. Zeibart:

Pursuant to Title 20, California Code of Regulations, section 1716, Briggs Law Corporation on behalf of Intervener Sunset Greens Homeowners Association, requests the information specified in the enclosed data requests.

These requests are being made to evaluate the impact the Quail Brush Generation Project might have on fire protection. If you are unable to provide the requested information, or object to the requested information, please notify us within 20 days of this notice. Per Title 20, California Code of Regulations, section 1716(f), you must contain the reasons for any inability to provide the requested information and the grounds for any objections.

Sincerely,

BRIGGS LAW CORPORATION

Mekaela M. Gladden

QUAIL BRUSH GENERATION PROJECT  
(11-AFC-3)

Sunset Greens's Data Request Set Two (SG 53-57)

## Background

An Environmental Impact Report (“EIR”) must identify and focus on significant environmental effects of the proposed project. Public Resources Code Section 21100(b)(1). To assess the impact of a proposed project on the environment, the lead agency examines the changes to existing environmental conditions that would occur in the affected area if the proposed project were implemented. 14 California Code of Regulations Section 15126.2(a).

Quail Brush Genco, LLC proposes to build a power plant on a site that is located in a “Very High Fire Hazard Severity Zone” according to the City of San Diego Fire-Rescue Department and according to Quail Brush’s Own Draft Wildfire Response Emergency Plan, submitted in this matter on July 9, 2012. On June 4, 2012, the Fire Chief of the City of San Diego submitted a letter in this matter which detailed that the San Diego Fire-Rescue Department would not be able to meet the City of San Diego’s adopted goal of 7.5 minutes for emergency response time for a single unit, and 10.5 minutes for a multiple unit response. The impact the project could have on fire response in this area is highly relevant to the instant proceedings since such information is needed for the state to make an environmentally informed decision under CEQA.

## Data Requests

- SG-53 Please provide any and all reports, studies, and/or other documents reasonably available to Quail Brush Genco, LLC which are related to the environmental impacts due to fire on or around the project site. Please provide any and all reports, studies, and or other documents related to both the proposed and adopted mitigation measures to address such impacts.
- SG-54 Please provide any and all reports, studies, and/or other documents reasonably available to Quail Brush Genco, LLC, which address any potential for mutual aid provided between the city of San Diego’s Fire Department and the city of Santee’s Fire Department.
- SG-55 Please provide any and all reports, studies, and or other documents reasonably available to Quail Brush Genco, LLC that identify the impact zone of an explosion at the project site.
- SG-56 Please provide any and all reports, studies, and/or other documents reasonably available to Quail Brush Genco, LLC, which address emergency response times to the project site.
- SG-57 Please provide any and all reports, studies, and/or other documents reasonably available to Quail Brush Genco, LLC, which address emergency response times impacted by the project.

DECLARATION OF SERVICE

I, Isabel O'Donnell declare that on October 30, 2012, I served and filed copies of the attached Data Request Set Two, dated October 30, 2012. This document is accompanied by the most recent Proof of Service list, located on the web page for this project at: <http://www.energy.ca.gov/sitingcases/quailbrush/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 first-class 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 marked "hard copy required" or where no e-mail address is provided.

**AND**

For filing with the Docket Unit at the Energy Commission:

- by sending an electronic copy to the e-mail 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-AFC-03  
1516 Ninth Street, MS-4  
Sacramento, CA 95814-5512  
[docket@energy.ca.gov](mailto:docket@energy.ca.gov)

**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  
[michael.levy@energy.ca.gov](mailto:michael.levy@energy.ca.gov)

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.





**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](http://WWW.ENERGY.CA.GOV)**

**APPLICATION FOR CERTIFICATION FOR THE  
QUAIL BRUSH GENERATION PROJECT**

**DOCKET NO. 11-AFC-03  
PROOF OF SERVICE  
(Revised 10/29/2012)**

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\*indicates change

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