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September 9, 2011

Ms. Charlene Wardlow  
Director Business Development  
ORMAT Nevada  
6225 Neil Road  
Reno, NV 89511

<b>DOCKET</b>	
<b>11-CAI-02</b>	
DATE	SEP 09 2011
RECD.	SEP 09 2011

Re: In the Matter of Complaint Against Ormat Nevada, Inc.  
(Docket No. 11-CAI-02)

Dear Ms. Wardlow:

California Unions for Reliable Energy (CURE) submits this second set of data requests to Ormat Nevada, Inc. related to the Complaint and Investigation of the North and East Brawley Geothermal Projects pursuant to Title 20 of the California Code of Regulations. The requested information is necessary to evaluate the Commission's jurisdiction over the North and East Brawley facilities individually and/or as an interconnected complex. Due to the Commission's schedule in this proceeding, please provide responses to these requests by September 16, 2011.

Please contact us if you have any questions. Thank you for your cooperation with these requests.

Sincerely,

/s/

Tanya A. Gulesserian

TAG:

Enclosure

cc: Docket (11-CAI-02)  
Proof of Service List (11-CAI-02)

2328-030v

**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

**CALIFORNIA UNIONS FOR RELIABLE ENERGY  
DATA REQUESTS, SET TWO**

September 9, 2011

Tanya A. Gulesserian  
Elizabeth Klebaner  
Marc D. Joseph  
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Attorneys for the CALIFORNIA  
UNIONS FOR RELIABLE ENERGY

The following data request is submitted by California Unions for Reliable Energy. Please provide your responses via email (if available) by September 16 to the following people:

Tanya A. Gulesserian  
Adams Broadwell Joseph & Cardozo  
601 Gateway Blvd., Suite 1000  
South San Francisco, CA 94080  
(650) 589-1660  
[tgulesserian@adamsbroadwell.com](mailto:tgulesserian@adamsbroadwell.com)

Please identify the person who prepared your responses to each data request. If you have any questions concerning the meaning of any data requests, please let us know.

**CURE v. Ormat Nevada Inc.**  
**CURE Data Requests Set Two (No. 16)**

**GENERATING CAPACITY**

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**Background:**

According to Ormat's January 29, 2010 updated project description for the East Brawley Geothermal Project (in Appendix J of the Verified Complaint), the East Brawley project is described as a 49.9 Mw net power plant comprising six 16 Mw gross OEC binary generating units.

**Data Request:**

16. Please describe the source of and quantify (in both peak kW and in average kW during operation) each of the loads which are responsible in aggregate for the difference between the gross plant output of  $6 \times 16 = 96$  Mw, and the net plant output of 49.9 Mw.

Dated: September 9, 2011

Respectfully submitted,

/s/

\_\_\_\_\_  
Tanya A. Gulesserian  
Elizabeth Klebaner  
Adams Broadwell Joseph & Cardozo  
601 Gateway Blvd., Suite 1000  
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Attorneys for  
California Unions for Reliable Energy

## 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 DATA REQUESTS, SET TWO**, 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](mailto: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](mailto: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

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COMPLAINANT

California Unions for Reliable Energy  
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& Cardozo  
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[mjoseph@adamsbroadwell.com](mailto:mjoseph@adamsbroadwell.com)  
[tgulesserian@adamsbroadwell.com](mailto:tgulesserian@adamsbroadwell.com)  
[eklebaner@adamsbroadwell.com](mailto: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

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## DECLARATION OF SERVICE

I, Valerie Stevenson, declare that on, September 9, 2011, I served and filed copies of the attached **LETTER TO CHARLENE WARDLOW**, 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:

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**AND**

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