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September 14, 2011

<b>DOCKET</b>	
<b>11-CAI-02</b>	
DATE	SEP 14 2011
RECD.	SEP 15 2011

Tanya A. Gulesserian  
Elizabeth Klebaner  
Marc D. Joseph  
Adams Broadwell Joseph & Cardozo  
601 Gateway Boulevard, Suite 1000  
South San Francisco, CA 94080

Re: *In the Matter of Complaint Against Ormat Nevada, Inc., Docket No. 11-CAI-02*  
*Ormat Nevada, Inc. Data Requests to California Unions for Reliable Energy, Set 1*

Dear Ms. Gulesserian,

On September 14, 2011 Ormat Nevada, Inc. ("Ormat") filed an Opposition to the California Unions for Reliable Energy Request for Committee Order Directing Production of Confidential Information and Extension of Schedule ("Opposition"), which contained objections to the submission of data requests by the California Unions for Reliable Energy ("CURE") to Ormat. Ormat firmly believes that these objections are valid, and that the California Energy Commission's regulations do not provide CURE with the right to issue data requests in a complaint and investigation proceeding. However, as stated in the Opposition, Ormat intends to voluntarily respond to CURE's data requests, to the extent it is able, in the spirit of cooperation and to move this proceeding forward. In the interest of fairness, Ormat submits this first set of data requests to CURE related to 11-CAI-02, in the belief that CURE will act in the same spirit of cooperation. Please provide responses to these data requests by September 21, 2011.

Please contact us if you have any questions.

Sincerely,



Christopher T. Ellison  
Samantha G. Pottenger

Attorneys for Ormat Nevada, Inc.

**DATA REQUEST SET NO. 1 OF ORMAT NEVADA, INC.  
TO CALIFORNIA UNIONS FOR RELIABLE ENERGY  
(11-CAI-02)**

**GENERAL INSTRUCTIONS**

The following General Instructions apply to each attached data request:

1. Please provide responses to the following questions by 5:00pm on Wednesday, September 21, 2011.
2. Please provide all relevant and responsive information available in response to each data request.
3. Please identify the person responding to the data request on the response.
4. For each data request, please identify each employee or consultant consulted in formulating answers to the data request.
5. For each data request, please identify all documents referenced in responding to these data requests.
6. Please include a copy of the question that the response addresses as well as the response to the question.
7. Please provide responses in electronic format (unless the response consists of significant paper records, in which case paper responses to that specific question are acceptable) on CD-ROM or as attachments to electronic mail.
8. If the response consists of spreadsheets, please assure that all formulae in the spreadsheets are intact.
9. Please provide the responses to questions as they become available, rather than waiting until all responses can be sent.
10. If any of the information sought in a data request will not be available by the response date for that request, please state the projected date on which such information will become available and the reason(s) for delay.
11. These are all ongoing requests. Accordingly, please provide supplemental responses to a data request as soon as further information is obtained that is responsive to the request.

**DATA REQUEST SET NO. 1 OF ORMAT NEVADA, INC.  
TO CALIFORNIA UNIONS FOR RELIABLE ENERGY  
(11-CAI-02)**

**DATA REQUESTS**

**REQUEST NO. 1:** On page 1 of the Prehearing Conference Statement of California Unions for Reliable Energy, David I. Marcus is identified as a witness who will “testify on the topics of transmission, interconnection, generation capacity, plant loads, and efficiency.”

- a. Please confirm whether David I. Marcus will be testifying to the generating capacity of the North Brawley Geothermal Development Project.
- b. If the answer to (a) is yes, please confirm whether David I. Marcus will provide testimony that the net generating capacity of the North Brawley Geothermal Development Project, as calculated pursuant to Section 2003, Title 20 of the California Code of Regulations, is 50 megawatts or above.
- c. Please confirm whether David I. Marcus will be testifying to the generating capacity of the East Brawley Geothermal Development Project.
- d. If the answer to (c) is yes, please confirm whether David I. Marcus will provide testimony that the net generating capacity of the East Brawley Geothermal Development Project, as calculated pursuant to Section 2003, Title 20 of the California Code of Regulations, is 50 megawatts or above.
- e. If the answers to (a) and (c) are yes, please explain the basis for the testimony, and provide all documentation, materials, and resources relied upon to support the testimony.
- f. Please confirm whether David I. Marcus will be testifying to the respective plant loads of the North Brawley Geothermal Development Project and the East Brawley Geothermal Development Project.
- g. If the answer to (f) is yes, please explain the basis for the testimony, and provide all documentation, materials, and resources relied upon to support the testimony.

**DATA REQUEST SET NO. 1 OF ORMAT NEVADA, INC.  
TO CALIFORNIA UNIONS FOR RELIABLE ENERGY  
(11-CAI-02)**

**REQUEST NO. 2:** On page 1 of the Prehearing Conference Statement of California Unions for Reliable Energy, CURE reserved the right to call a witness to testify “in response to Ormat’s responses to Staff regarding generating capacity.”

- a. If CURE intends to exercise this right and call a witness to testify in response to Ormat’s responses to Staff regarding generating capacity, please identify each individual that CURE expects to present.
- b. With respect to each witness identified in response to (a), please provide a statement of their qualifications and identify the specific subject matter of their testimony.
- c. With respect to any witness identified in response to (a), please confirm whether that witness will be testifying to the generating capacity of the North Brawley Geothermal Development Project.
- d. If the answer to (c) is yes, please confirm whether that witness will provide testimony that the net generating capacity of the North Brawley Geothermal Development Project, as calculated pursuant to Section 2003, Title 20 of the California Code of Regulations, is 50 megawatts or above.
- e. With respect to any witness identified in response to (a), please confirm whether that witness will be testifying to the generating capacity of the East Brawley Geothermal Development Project.
- f. If the answer to (e) is yes, please confirm whether that witness will provide testimony that the net generating capacity of the East Brawley Geothermal Development Project, as calculated pursuant to Section 2003, Title 20 of the California Code of Regulations, is 50 megawatts or above.
- g. If the answers to (c) and (e) are yes, please explain the basis for the testimony, and provide all documentation, materials, and resources relied upon to support the testimony.

STATE OF CALIFORNIA

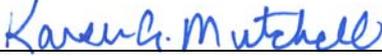
Energy Resources Conservation  
and Development Commission

In the Matter of Complaint Against )  
ORMAT NEVADA, INC. Brought By ) Docket No. 11-CAI-02  
CALIFORNIA UNIONS FOR RELIABLE )  
ENERGY )  
\_\_\_\_\_ )

**PROOF OF SERVICE**

I, Karen A. Mitchell, declare that on September 14, 2011, I served the attached *Data Requests, Set No. 1* via electronic and U.S. mail to all parties on the attached service list.

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

  
\_\_\_\_\_  
Karen A. Mitchell

**SERVICE LIST**  
**11-CAI-02**

**RESPONDENT**

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**COMPLAINANT**

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