

STATE OF CALIFORNIA
Energy Resources Conservation
and Development Commission

In the Matter of:

APPLICATION FOR CERTIFICATION
FOR THE HIDDEN HILLS SOLAR
ELECTRIC GENERATING SYSTEM
(SEGS)

DOCKET NO. 11-AFC-2

**INTERVENOR CENTER FOR BIOLOGICAL DIVERSITY'S
REQUEST FOR BRIEFING SCHEDULE AND TO PROVIDE ADDITIONAL
TIME TO RESPOND TO APPLICANT'S MOTION**

September 5, 2012

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The Center for Biological Diversity (“Center”) requests that the Presiding Member of the Committee set a schedule for briefing on the motion filed by the Applicant related to the Hidden Hills Solar Project (“Project”) on Friday August 31, 2012, and provide a minimum of 21 days (3 weeks) for responses to be filed. Pursuant to 20 CCR § 1716.5, the Presiding Member can provide a schedule for briefing and hearing on these matters that differs from the 15 day response time provided in the regulation and the 30 days for decision.

In support of this request, the Center provides the following information:

- The motion was filed on the Friday before a three day weekend leaving only 9 business days to prepare a response under the 15 day default time provided in the regulation;
- The motion is over 15 pages and contains both factual assertions (some of which may be disputed) and legal argument; therefore the Center (and other parties who choose to respond) will require significant attorney time to adequately research and prepare a response;
- Lisa Belenky, Center attorney in this matter, has briefing in a federal lawsuit due on September 7, 2012 and other previously scheduled commitments

that will make it impossible for her to address this motion until after that motion is filed;

- Ileene Anderson, Center biologist in this matter, has previously scheduled field work on September 12-13, 2012 and other previously scheduled commitments that will make it very difficult in the time allotted under the regulation for her to address this motion;
- Providing a small amount of additional time for briefing will not prejudice the applicant which filed this motion more than 3 months after the PSA was initially released by staff;
- A short extension of time for briefing may also reduce the need for lengthy presentations at the hearing on this motion and better assist the committee in making a determination on the motion

Dated: September 5, 2012

Respectfully submitted,



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**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**

**APPLICATION FOR CERTIFICATION FOR THE
HIDDEN HILLS SOLAR ELECTRIC
GENERATING SYSTEM**

Docket No. 11-AFC-02

**PROOF OF SERVICE
(Revised 8/27/12)**

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DECLARATION OF SERVICE

I, Jillene Anderson declare that on 9/5, 2012, I served and filed copies of the attached Request, dated 9/5, 2012. This document is accompanied by the most recent Proof of Service list, located on the web page for this project at: www.energy.ca.gov/sitingcases/hiddenhills/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-02
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512
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
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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.


