

STATE OF CALIFORNIA

Energy Resources Conservation  
and Development Commission

<b>DOCKET</b> <b>04-AFC-1</b>
DATE <u>JUL 26 2004</u>
RECD. <u>JUL 26 2004</u>

In the Matter of )  
 Application for Certification of the )  
 San Francisco Electric Reliability Project )  
 (SFERP) )  
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Docket No. 04-AFC-1

**APPLICANT'S OBJECTIONS AND NOTICES OF NEED FOR  
 ADDITIONAL TIME IN RESPONSE TO COMMUNITY POWER  
 COOPERATIVE DATA REQUESTS**

July 26, 2004

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Pursuant to Rule 1716 of the California Energy Commission’s (CEC) Rules of Practice and Procedure, the City of San Francisco (“City” or “Applicant”) submits the following objections and notices of need for additional time in response to the data requests submitted by the San Francisco Community Power Cooperative regarding the San Francisco Electric Reliability Project (SFERP). The data requests are numbered 1 through 8. Although they were conveyed in letters dated July 8 and July 15, the requests were not formally received by the City until July 19 during the course of the data response workshop. The letters were initially addressed to Julie Labonte who was on vacation until July 12 and then in and out of surgery during the week of July 12- 16.

The City notes that to comply with Rule 1716, the City must submit its objections and notifications of the need for additional time within 10 days, well before responses are due. The City submits these objections and notices of need for additional time, but will, as set forth herein, endeavor to answer all but one of the questions to the extent possible and consistent with the law.

**Data Request 1:** The City objects to the request on the grounds that it is unduly broad and burdensome to the extent it requests “*all* analyses and associated workpapers” and “*all* financial, cost-effectiveness, and cost-benefit analyses”. Notwithstanding the objection, the City will make best efforts to identify, compile and supply all key responsive documents that are not privileged. The City will endeavor to provide the response by August 18 but may require additional time to identify and compile responsive documents. To the extent additional time is required, the City will by August 18 provide an indication of the date by which the City will supply the information.

**Data Request 3:** The City objects to the request on the grounds that it is unduly broad and burdensome to the extent it requests “*all* operational scenarios, analyses and associated workpapers”. Notwithstanding the objection, the City will make best efforts to identify, compile and supply all key responsive documents that are not privileged. The

City will endeavor to provide the response by August 18 but may require additional time to identify and compile responsive documents. To the extent additional time is required, the City will by August 18 provide an indication of the date by which the City will supply the information.

**Data Request 4:** The City objects to this request on the grounds that it is not familiar with the statement in question and hence it does not have any formal comment on the matter.

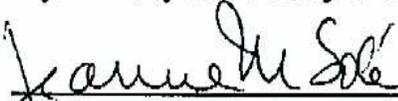
**Data Request 5:** The City objects to the request on a number of grounds. First, the documents requested are publicly available at the California Energy Commission. Second, the City does not concede that its testimony on Potrero 7, a plant several times larger than the SFERP, and of a different configuration, is relevant to the SFERP. Notwithstanding these objections, the City will as a courtesy provide to the Community Power Cooperative, a copy of its prefiled testimony in the Potrero 7 case.

**Data Request 7:** The City objects to the request on the grounds that it is unduly broad and burdensome to the extent it requests "*all* analyses related to equilibrium emissions under different power plant scenarios." Notwithstanding the objection, the City will make best efforts to identify, compile and supply all key responsive documents that are not privileged. The City will endeavor to provide the response by August 18 but may require additional time to identify and compile responsive documents. To the extent additional time is required, the City will by August 18 provide an indication of the date by which the City will supply the information.

Respectfully submitted,

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