

**DOCKET**  
**04-AFC-1**

**DATE** SEP 24 2004

**RECL.** SEP 24 2004

---

**SAN FRANCISCO ELECTRIC  
RELIABILITY PROJECT  
(04-AFC-1)**

**San Francisco Community Power  
(SFCP), SET 1C, FURTHER  
DOCUMENTS**

**(Responses to Data Requests: 1 and 3)**

Submitted by

**CITY AND COUNTY OF SAN FRANCISCO**

September 24, 2004



**CH2MHILL**

2485 Natomas Park Drive, Suite 600  
Sacramento, California 95833-2937

---

**SAN FRANCISCO ELECTRIC RELIABILITY PROJECT  
(04-AFC-1)  
SFCP, SET 1C**

**Technical Area:**

**Author:** Steve Moss, San Francisco Community Power Co-op (SFCP)

**SFERP Author:** Karen Kubick

**DATA REQUEST**

1. Please provide all analyses and associated workpapers used by the City to support its decision to site three of the combustion turbines at the Potrero Power Plant, as opposed to other locations. In particular, please provide all financial, cost effectiveness, and cost-benefit analyses which examine the implications of different siting locations, as well as the "no project" alternative.

**Response:** City incorporates by reference herein its objections filed on July 26, 2004 to Data Request 1, the City's response to Data Request 1 submitted to SFCP on August 18, 2004, and the City's supplemental response to Data Request 1 submitted to SFCP on September 7, 2004. Consistent with and without waiving said objections, the City is providing with these responses further documents that are being mailed to SFCP, CARE, Mr. Sarvey and the CEC on September 24, 2004. The City will provide copies of these documents to other parties upon request. The City redacted from two e-mails that are being provided in these further responses information that is protected by the attorney client privilege and the attorney work product privilege. California Evidence Code, Section 952. The City does not waive the attorney client privilege and/or the attorney work product privilege as it relates to any issue, matter, topic or document that is the subject of these further responses, and the disclosure of any document in this further response shall not be deemed to be a waiver of the attorney client and/or the attorney work product privileges by the City.

The documents provided with these responses are in the City's possession and reflect analyses of different siting options. These documents were found in the files of various City staff and are provided for completeness even though most were not presented to or considered by higher level City policy makers in the context of final determinations on the proposed location to be filed with the CEC.

The City has undertaken a reasonable search of its records and files and has located no further documents beyond those provided with this response that are responsive to this request.

3. Please provide all operational scenarios, analyses and associated workpapers, as well as resulting emissions impacts, related to the number of hours the CTs are expected to run.

**Response:** City incorporates by reference herein its objections filed on July 26, 2004 to Data Request 3, City's response to Data Request 3 submitted to SFCP on August 18, 2004, and the City's supplemental response to Data Request 1

**SAN FRANCISCO ELECTRIC RELIABILITY PROJECT  
(04-AFC-1)  
SFCP, SET 1C**

submitted to SFCP on September 7, 2004. Consistent with and without waiving said objections, the City is providing with these responses further documents that are being mailed to SFCP, CARE, Mr. Sarvey and the CEC on September 24, 2004. The City will provide copies of these documents to other parties upon request. The City redacted from two e-mails that are being provided in these further responses information that is protected by the attorney client privilege and the attorney work product privilege. California Evidence Code, Section 952. The City does not waive the attorney client privilege and/or the attorney work product privilege as it relates to any issue, matter, topic or document that is the subject of these further responses, and the disclosure of any document in this further response shall not be deemed to be a waiver of the attorney client and/or the attorney work product privileges by the City.

The documents provided with these responses are in the City's possession and reflect operational scenarios, analyses, and associated workpapers, as well as resulting emission impacts. These documents were found in the files of various City staff and are provided for completeness. While the documents may reflect particular scenarios about CT running hours developed by or for City staff at different times, they do not reflect a City position on expected CT running hours, since no such position exists at this time beyond the request for permitting for 12,000 hours per year total for the three CTs.

The City has undertaken a reasonable search of its records and files and has located no further documents beyond those provided with this response that are responsive to this request.

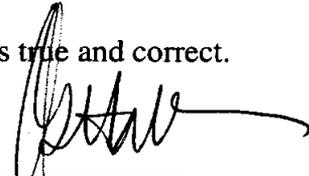
Energy Resources Conservation  
and Development Commission

Application for Certification for the )  
SAN FRANCISCO ELECTRIC RELIABILITY ) Docket No. 04-AFC-1  
PROJECT (SFERP) )  
\_\_\_\_\_ )

**PROOF OF SERVICE**

I, ARLENE G. HALL, declare that on September 24, 2004, I deposited copies of the attached **SAN FRANCISCO COMMUNITY POWER (SFCP), SET 1C, FURTHER DOCUMENTS (RESPONSES TO DATA REQUESTS: 1 AND 3)**, in the United States mail in San Francisco, California, with first-class postage thereon fully prepaid and addressed to all parties on the attached service list.

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

  
\_\_\_\_\_  
ARLENE G. HALL

**SERVICE LIST  
04-AFC-1**

**DOCKET UNIT**

Send the original signed document plus 12 copies to the following address:

**CALIFORNIA ENERGY COMMISSION  
Attn: Docket No. 01-AFC-17  
DOCKET UNIT, MS-4  
1516 Ninth Street  
Sacramento, CA 95814-5512**

In addition to the documents sent to the Commission Docket Unit, also send individual copies of all documents to:

**APPLICANT**

**Jesse Blout - Economic Development  
Director  
Office of the Mayor  
City and County of San Francisco  
1 Dr. Carlton B. Goodlett Place, Room 200  
San Francisco, CA 94102-4641**

**Applicant Project Manager**

**Karen Kubick, P.E.  
San Francisco Public Utilities Commission  
General Manager's Office  
1155 Market St., 11th Floor  
San Francisco, CA 94103**

**APPLICANT'S CONSULTANTS**

**Steve De Young  
De Young Environmental Consulting  
4155 Arbolado Drive  
Walnut Creek, CA 94598**

**John Carrier  
CH2MHill  
2485 Natomas Park Drive, Suite 600  
Sacramento, CA 95833-2943**

**COUNSEL FOR APPLICANT**

**Jeanne Sole  
San Francisco City Attorney  
City Hall, Room 234  
1 Dr. Carlton B. Goodlet Place  
San Francisco, CA 94102-4682**

**INTERESTED AGENCIES**

**Emilio E. Varanini, III, General Counsel  
California Power Authority  
910 P Street, Suite 142A  
Sacramento, CA 95814**

**Independent System Operator  
Jeffery Miller  
151 Blue Ravine Road  
Folsom, CA 95630**

**Electricity Oversight Board  
770 L Street, Suite 1250  
Sacramento, CA 95814**

**INTERVENORS**

**Jeffrey S. Russell  
Vice President, West Region Operations  
Mirant California, LLC  
1350 Treat Blvd., Suite 500  
Walnut Creek, CA 94597**

**Michael J. Carroll  
Latham & Watkins LLP  
650 Town Center Drive, Suite 2000  
Costa Mesa, CA 92626**

**Potrero Boosters Neighborhood Asso.  
Dogpatch Neighborhood Asso  
Joseph Boss  
934 Minnesota Street  
San Francisco, CA 94107**

**Robert Sarvey  
501 West Grantline Road  
Tracy, CA 95376**

**Greenaction for Health &  
Environmental Justice  
C/o Marc Harrison  
Karl Krupp  
One Hallidie Plaza #760  
San Francisco, CA 94706**

**Californians for Renewable Energy, Inc.**  
**Michael E. Boyd, President**  
**5439 Soquel Drive**  
**Soquel, CA 95073**

**Lynce Brown**  
**24 Harbor Road**  
**San Francisco, CA 94124**



CALIFORNIA  
ENERGY  
COMMISSION

1516 Ninth Street  
Sacramento, CA 95825-5512  
800-822-6228  
www.energy.ca.gov

## ELECTRONIC PROOF OF SERVICE LIST

### Revised 9-15-04

SAN FRANCISCO ELECTRIC RELIABILITY PROJECT  
APPLICATION FOR CERTIFICATION,  
DOCKET NO. 04-AFC-1

docket@energy.state.ca.us	Energy Commission Docket Unit
sharris@energy.state.ca.us	Commissioner Boyd's Office
lbeckstr@energy.state.ca.us	Lana Beckstrom, Executive Assistant Adviser to Commissioner Boyd
cgraber@energy.state.ca.us	Cathy Graber, Commissioner Geesman Office
jgeesman@energy.state.ca.us	Commissioner Geesman
pao@energy.state.ca.us	Margaret J. Kim, Public Adviser
svalkosk@energy.state.ca.us	Stan Valkosky, Hearing Officer
gfay@energy.state.ca.us	Gary Fay, Hearing Officer
Bpfanner@energy.state.ca.us	Bill Pfanner, Project Manager
Bwesterf@energy.state.ca.us	Bill Westerfield, Staff Counsel
DRatliff@energy.state.ca.us	Dick Ratliff, Staff Counsel
Jesse.blout@sfgov.org	Jesse Blout- Office of Mayor
<b>kkubick@swater.org</b>	<b>Karen Kubick, Project Manager</b>
steve@deyoung.org	Steve De Young, Consultant
Jeanne.Sole@sfgov.org	Jeanne Sole, SF City Attorney
emilio.varanini@dgs.ca.gov	Emilio E. Varanini, Counsel for California Power Authority
Jmiller@caiso.com	Jeffery Miller, Independent System Operator
Jeffrey.russell@mirant.com	Jeffrey S. Russell, Mirant California, Intervenor
Michael.carroll@lw.com	Michael J. Carroll, Latham & Watkins LLP, Intervenor
Joeboss@joeboss.com	Joseph Boss, Potrero Boosters Neighborhood Assoc, Intervenor
karl@greenaction.org	Greenaction for Health & Environmental Justice, Intervenor
SarveyBob@aol.com	Bob Sarvey, Intervenor
michaelboyd@sbcglobal.net	Michael E. Boyd, CARE, Intervenor
L_brown123@yahoo.com	Lynn D. Brown, CARE, Intervenor

I declare that I transmitted the foregoing document via e-mail, or as indicated by first class postal mail, to the above named on the date indicated thereby. I declare under penalty of perjury that the foregoing is true and correct.

Sarah Madams  
CH2M HILL