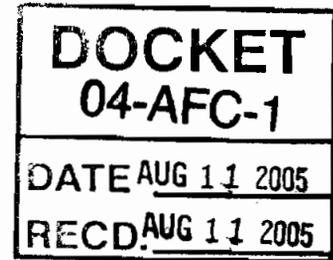


STATE OF CALIFORNIA
Energy Resources Conservation
and Development Commission



In the Matter of)
Application for Certification of the)
San Francisco Electric Reliability Project)
(SFERP))
_____)

Docket No. 04-AFC-1

**APPLICANT'S FURTHER OBJECTIONS TO THE SECOND SET OF DATA
REQUESTS OF THE SAN FRANCISCO COMMUNITY POWER
COOPERATIVE**

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 these further objections to the data requests submitted by the San Francisco Community Power Cooperative (SF Power) on August 5, 2005, regarding the San Francisco Electric Reliability Project (SFERP).

Yesterday, the City filed an objection noting that the deadline for intervenor discovery was June 24 and that a request to extend that deadline was recently denied. Today SF Power filed a response to the City's objections. The City files these further request-specific objections to preserve its rights in the event that SF Power's request for responses is granted.

- (1) Please provide data on the funding levels and content of community benefits programs provided as part of other similarly-sized power generating projects that have been developed in the state since 1995. Include data on the population density and demographic characteristics of the communities nearby the proposed facilities.

Objection/comment: The City objects to this request on the grounds that was not a party to any of those transactions and, therefore, does not have any specific knowledge of the community benefits packages that have been developed for other projects throughout the state since 1995. It further objects to this request on the grounds that the data on such funding levels and content, if available, is in publicly available California Energy Commission documents that are as accessible to SF Power as to the City. If further objects to the request on the grounds that the request is burdensome.

- (3) Please provide a comparison of the San Francisco Electric Reliability Project's proposed community benefits package with the mitigation funds provided as part of the sale of the Potrero Power Plant to Mirant Corporation (e.g., what were the assumed emissions increases associated with that transaction, and how did that compare to funding levels)?

Objection/comment: The City objects to this request on the grounds that it was not a party to this transaction and, therefore, has no specific knowledge of the information sought. The City further objects on the grounds that the information on mitigation provided as part of the sale of the Potrero Power Plant to Mirant Corporation (if any) is publicly available in documents related to California Public Utilities Commission Docket 98-01-008. A Draft and Final Environmental Impact Report were prepared by the CPUC in that case.

- (7) What percentage of the \$13 million in mitigation funds provided under the sale of the Potrero Power Plant has been used for city administration of these funds?

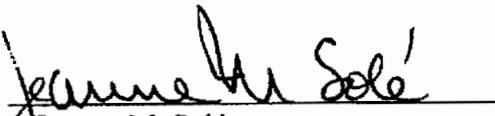
Objection/comment: The City did not receive any money in mitigation funds under the sale of the Potrero Power Plant; rather \$13 million was allocated to the City in legislation in light of the continued operation of older power plants within the City. Moreover, the question is not relevant since the City has set forth in its community benefits proposal the amount of money that will be used for administration of the program by the City.

Dated: August 11, 2005

Respectfully submitted:

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Revised 8-03-05

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

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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.

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