

DOCKET 04-AFC-1
DATE JUN 15 2005
RECD. JUN 16 2005

**BEFORE THE
STATE OF CALIFORNIA
ENERGY RESOURCES CONSERVATION
AND DEVELOPMENT COMMISSION**

Application for Certification
For the San Francisco
Electric Reliability Project

Docket No. 04-AFC-1

Pursuant to Public Resources Code section 25519(b) and California Code of Regulations, title 20, section 1716(g), CALifornians for Renewable Energy, Inc. (CARE) respectfully requests, for the reasons described below, the Committee to compel Intervener San Francisco Community Power to provide the information identified in CARE's First Set of Data Requests filed on Intervener and the Committee on May 20th, 2005.

As of this writing CARE has received no objections from Intervener San Francisco Community Power from CARE's May 20th Data Request. We presume the absence of any objections means that Intervener San Francisco Community Power has waived any future objections to providing a complete response to CARE's data request.

On June 3rd 2005 SF Community Power provided CARE a response to CARE's data request wherein it stated without a claim of protection:

A comprehensive file of historical SFE grant expenditures can be obtained directly from SFE. SF Power notes that it is extremely proud of its work for SFE, which resulted in the single most successful investment of funds under the City's Environmental Justice program to date, as evidenced by awards SF Power has received from the City and County of San Francisco Board of Supervisors, Flex Your Power, and the U.S. Environmental Protection Agency.

Intervener CARE has been granted leave by the Committee to Intervene in the above captioned proceedings with financial hardship whereas Intervener SF Power has not. As a low-income resident of color I lack the financial resources to pay for the cost of copying the financial records sought from SF Power, and SF Power has not filed any objections to the cost of copying such records. Wherefore for good cause shown I respectfully request the Committee Compel Intervener San Francisco Community Power to respond to

**PROOF OF SERVICE (REVISED 5/4/05) FILED WITH
ORIGINAL MAILED FROM SACRAMENTO ON 6/16/05**

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CARE's data request in full and provide a copy of the "comprehensive file of historical SFE grant expenditures" to Intervener CARE...

Respectfully submitted,



Lynne Brown- Vice President,
CALifornians for Renewable Energy,
Inc. (CARE)
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6-15-2005

Verification

I am an officer of the Intervening Corporation herein, and am authorized to make this verification on its behalf. The statements in the foregoing document are true of my own knowledge, except matters, which are therein stated on information and belief, and as to those matters I believe them to be true.

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

Executed on this 15th day of June 2005, at Soquel, California.



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