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July 8, 2004

Ms. Julie LaBonte, P.E.
San Francisco Public Utility Commission
City and County of San Francisco, General Management Office
1155 Market Street, Floor Eleven
San Francisco, California 94103

Re: San Francisco Electric Reliability Project (SFERP) Data Requests

Dear Julie:

As you know, SF Power is a formal intervenor in the above-cited proceeding. In this capacity we'd appreciate your prompt response to the following data requests:

(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.

(2) Please provide a copy of the Department of Water Resource's agreement related to the siting and operation of the CTs.

(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.

(4) Please comment on Pacific Gas and Electric Company's statement, as filed in its marginal cost testimony in its General Rate Case Phase II proceeding, that a CT must operate at least 827 hours annually to pay back its investment costs. (PG&E 2003 GRC, A.02-11-017, Exh. PG&E-2, p. 2-9, June 17, 2004.)

(5) Please provide copies of all City-sponsored testimony related to Mirant America's proposed development of Unit 7 at Potrero that could be construed to apply to the City's current application. In particular, please provide all overlapping testimony related to cultural resources, polluting air emissions, water quality issues, and transportation of hazardous materials.

Thanks much,

PROOF OF SERVICE (REVISED 7-9-04) FILED WITH
ORIGINAL MAILED FROM SACRAMENTO ON 7-21-04
Ephraim

Steven Moss

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July 15, 2004

Ms. Julie LaBonte, P.E.
San Francisco Public Utility Commission
1155 Market Street, Floor Eleven
San Francisco, California 94103

Re: San Francisco Electric Reliability Project (SFERP) Data Request Number 2

Dear Julie:

SF Power would appreciate your prompt response to the following data requests:

(6) The City has indicated that the SFERP's primary purpose is to close existing power plants located in Southeast (SE) SF while ensuring electric reliability. The California Independent System Operator has indicated that the Hunters Point (HP) Power Plant can be retired upon completion of Pacific Gas and Electric Company-proposed transmission projects, likely by 2007 if approved by the California Public Utility Commission (i.e., transmission is the project "alternative").

Is it the City's position that, should the proposed transmission projects be successfully completed and serve to close HP, that the SFERP is intended to close the existing Potrero Power Plant complex? If so, what steps will the City take to achieve this goal? What guarantees will the City provide the impacted local community that these actions will be taken, and serve to close the plant?

(7) In 2003 SF Power provided the City with an analysis demonstrating that equilibrium polluting air emissions from power plants could be higher in SE SF after HP closure and with the SFERP implemented. Has the City evaluated this analysis, and come to any conclusions about it? Please provide all analyses related to equilibrium emissions under different power plant scenarios.

(8) How does the City intend to determine the funding level for emissions offsets and a mitigation package associated with the SFERP? Please provide all supporting documents related to this issue.

I should note that we have not yet received a response to an oral request, made at the June workshop, for an explanation of the role and content of a January 14 City Memorandum that provided a financial analysis of the SFERP. Please provide a response to this inquiry, as well as our previous data requests, as soon as possible.

Thanks much,

Steven Moss

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

APPLICATION FOR CERTIFICATION FOR THE SAN FRANCISCO ELECTRIC RELIABILITY PROJECT	**Docket No. 04-AFC-01** **PROOF OF SERVICE** ***Revised 7/9/04**

I, EVELYN M JOHNSON, declare that on JULY 21, 2004, I deposited copies of the attached **RE: Steve Moss; Intervener's Data Request.** in the United States mail in Sacramento, CA with first class postage thereon fully prepaid and addressed to the following:

DOCKET UNIT

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

CALIFORNIA ENERGY COMMISSION
Attn: Docket No. 04-AFC-01
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:

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

(Signature)

* * * *

CEC INTERNAL DISTRIBUTION LIST ONLY

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