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September 16, 2011

<b>DOCKET</b>	
<b>11-CAI-02</b>	
DATE	<u>Sept 16 2011</u>
RECD.	<u>Sept 16 2011</u>

Tanya A. Gulesserian  
Elizabeth Klebaner  
Marc D. Joseph  
Adams Broadwell Joseph & Cardozo  
601 Gateway Boulevard, Suite 1000  
South San Francisco, CA 94080

Re: *In the Matter of Complaint Against Ormat Nevada, Inc., Docket No. 11-CAI-02*  
*Ormat Nevada, Inc. Data Requests to California Unions for Reliable Energy, Set 2*

Dear Ms. Gulesserian,

Enclosed is Ormat Nevada, Inc.'s second set of data requests to CURE related to 11-CAI-02. Please provide responses to these data requests by September 21, 2011.

Please contact us if you have any questions.

Sincerely,



Christopher T. Ellison  
Samantha G. Pottenger

Attorneys for Ormat Nevada, Inc.

**DATA REQUEST SET NO. 2 OF ORMAT NEVADA, INC.  
TO CALIFORNIA UNIONS FOR RELIABLE ENERGY  
(11-CAI-02)**

**GENERAL INSTRUCTIONS**

The following General Instructions apply to each attached data request:

1. Please provide responses to the following questions by 5:00pm on Wednesday, September 21, 2011.
2. Please provide all relevant and responsive information available in response to each data request.
3. Please identify the person responding to the data request on the response.
4. For each data request, please identify each employee or consultant consulted in formulating answers to the data request.
5. For each data request, please identify all documents referenced in responding to these data requests.
6. Please include a copy of the question that the response addresses as well as the response to the question.
7. Please provide responses in electronic format (unless the response consists of significant paper records, in which case paper responses to that specific question are acceptable) on CD-ROM or as attachments to electronic mail.
8. If the response consists of spreadsheets, please assure that all formulae in the spreadsheets are intact.
9. Please provide the responses to questions as they become available, rather than waiting until all responses can be sent.
10. If any of the information sought in a data request will not be available by the response date for that request, please state the projected date on which such information will become available and the reason(s) for delay.
11. These are all ongoing requests. Accordingly, please provide supplemental responses to a data request as soon as further information is obtained that is responsive to the request.

**DATA REQUEST SET NO. 2 OF ORMAT NEVADA, INC.  
TO CALIFORNIA UNIONS FOR RELIABLE ENERGY  
(11-CAI-02)**

**DATA REQUESTS**

**REQUEST NO. 3:** On page 6 of its Prehearing Conference Statement, CURE states that CURE is a “coalition of labor unions” with members.

- a) Please provide a list of the current members of CURE.
- b) Please confirm that these members have authorized CURE’s participation in 11-CAI-02, and provide written documentation, if any, of this authorization.

**REQUEST NO. 4:** On page 6 of its Prehearing Conference Statement, CURE states that certain “members” of CURE live in Imperial County.

- a) Please provide a list of the members of CURE who live in Imperial County, and who have members who live in Imperial County.

**REQUEST NO. 5:** On page 7 of its Prehearing Conference Statement, CURE states that it is “neither a corporation nor a business association”.

- a) Please explain in detail CURE’s organizational structure, including but not limited to: whether there are elected or appointed positions or officers, such as a chairman or president, and explain the significance, authorities, and duties of each position or office.
- b) Please provide a copy of any documents that authorize CURE to represent its members in 11-CAI-02 including but not limited to: articles of incorporation, bylaws, a written charter, or a written agreement to form a coalition.

STATE OF CALIFORNIA

Energy Resources Conservation  
and Development Commission

In the Matter of Complaint Against )  
ORMAT NEVADA, INC. Brought By ) Docket No. 11-CAI-02  
CALIFORNIA UNIONS FOR RELIABLE )  
ENERGY )  
\_\_\_\_\_ )

**PROOF OF SERVICE**

I, Karen A. Mitchell, declare that on September 16, 2011, I served the attached *Data Requests to California Unions for Reliable Energy, Set No. 2* via electronic and U.S. mail to all parties on the attached service list.

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



\_\_\_\_\_  
Karen A. Mitchell

**SERVICE LIST**  
**11-CAI-02**

**RESPONDENT**

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**INTERESTED**  
**AGENCIES/ENTITIES/PERSONS**

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