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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  
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  
Response to CURE's Data Requests, Set 1 and Set 2

Dear Ms. Gulesserian,

Enclosed is Ormat Nevada, Inc.'s response to California Unions for Reliable Energy Data Requests Set 1 and Set 2. Please contact me if you have any questions.

Sincerely,



Samantha G. Pottenger

Attorneys for Ormat Nevada, Inc.

**Response of Ormat Nevada, Inc. to CURE Data Requests Set 1  
11-CAI-02**

Response Date: September 16, 2011	Response prepared by or under direction of: Charlene Wardlow and Bob Sullivan
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**1. Please identify the operational water demand for the North Brawley facility in acre feet per year.**

6,800 acre-feet. This information is also available in the following exhibits:

- Respondent's Exhibit 200, Appendix C; and
- Respondent's Exhibit 200, Appendix G.

**2. Please identify the proposed operational water demand for the East Brawley facility in acre feet per year.**

5,500 acre-feet. This information is also available in the following exhibits:

- CURE's Exhibit 19;
- CURE's Exhibit 28; and
- CURE's Exhibit 47.

**3. Please identify the proposed construction water demand for the East Brawley facility.**

Ormat will not respond to this data request on the basis that it is not relevant to this proceeding.

**4. Please describe how treated effluent from the BWWTP will be delivered to the North Brawley facility.**

As explained in Respondent's Exhibit 200, North Brawley will not receive treated effluent from the BWWTP.

**5. Please describe how cooling water blowdown from the North Brawley facility will be delivered to the East Brawley facility.**

This is not a proposed design feature for East Brawley.

**6. Please provide Respondent's water supply agreement with the Imperial Irrigation District for the East Brawley facility.**

East Brawley does not have a water supply agreement with Imperial Irrigation District.

**Response of Ormat Nevada, Inc. to CURE Data Requests Set 1  
11-CAI-02**

Response Date: September 16, 2011	Response prepared by or under direction of: Charlene Wardlow and Bob Sullivan
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**7. Please identify the location of the proposed East Brawley substation in relation to the East Brawley power plant and geothermal field.**

This information is already available in the following exhibits:

- Respondent's Exhibit 200;
- CURE's Exhibit 28; and
- CURE's Exhibit 47.

**8. Please state whether the East Brawley facility will require a new transmission interconnection agreement, and if so:**

Yes.

**a. If an interconnection request been submitted to IID, please provide a copy of that request.**

Ormat will not respond to this data request on the basis that it is not relevant to this proceeding

**b. What is the status of the East Brawley interconnection request?**

A draft large generator interconnection agreement is under review by Ormat and the Imperial Irrigation District.

**c. When is the SIS for the East Brawley interconnection due to be provided by IID, either as a draft or as a final SIS?**

The East Brawley System Impact Study has already been completed.

**d. Please provide a copy of any draft or final SIS which exists for the East Brawley project, either as a stand-alone project or in combination with any other project(s).**

This information is already available in the following exhibit:

- Respondent's Exhibit 201.

**Response of Ormat Nevada, Inc. to CURE Data Requests Set 1  
11-CAI-02**

Response Date: September 16, 2011	Response prepared by or under direction of: Charlene Wardlow and Bob Sullivan
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**9. Please state whether interconnection of the East Brawley facility will rely on the interconnection agreement for the North Brawley facility.**

No.

**10. Please state whether the Respondent will rely on the North Brawley System Impact Study, which was prepared by the Imperial Irrigation District pursuant to an agreement with Respondent, and which evaluates the impacts of a 150 MW generation project in the North Brawley geothermal area?**

Ormat will not respond to this data request on the basis that it is vague and ambiguous.

**11. Please provide a map showing the planned perimeter fencing for the North Brawley and East Brawley project.**

The North Brawley power plant site is fenced and the proposed East Brawley power plant site would be fenced as shown in their respective site plans. The well fields are not fenced. Each well pad will be individually fenced. Please refer to Attachment 1 for a figure of the fencing for North Brawley.

**12. Please provide a map showing all access and maintenance roads for the East Brawley project.**

This information is already available in the following exhibit:

- CURE's Exhibit 47.

**13. Please provide a map showing all access and maintenance roads for the North Brawley project.**

Please refer to Attachment 2.

**14. Please provide a map showing the planned fire loop and fire roads for the North Brawley project.**

Please refer to Attachment 1.

**Response of Ormat Nevada, Inc. to CURE Data Requests Set 1  
11-CAI-02**

Response Date: September 16, 2011	Response prepared by or under direction of: Charlene Wardlow and Bob Sullivan
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**15. Please provide a map showing the planned fire loop and fire roads for the East Brawley project.**

Ormat will not respond to this data request on the basis that it is not relevant to this proceeding.

**Response of Ormat Nevada, Inc. to CURE Data Requests Set 2  
11-CAI-02**

Response Date: September 16, 2011	Response prepared by or under direction of: Charlene Wardlow and Bob Sullivan
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**16. Please describe the source of and quantify (in both peak kW and in average kW during operation) each of the loads which are responsible in aggregate for the difference between the gross plant output of  $6 \times 16 = 96$  Mw, and the net plant output of 49.9 Mw.**

This information is available in the following exhibits:

- Respondent's confidential Exhibit 203; and
- Respondent's confidential Exhibit 204.

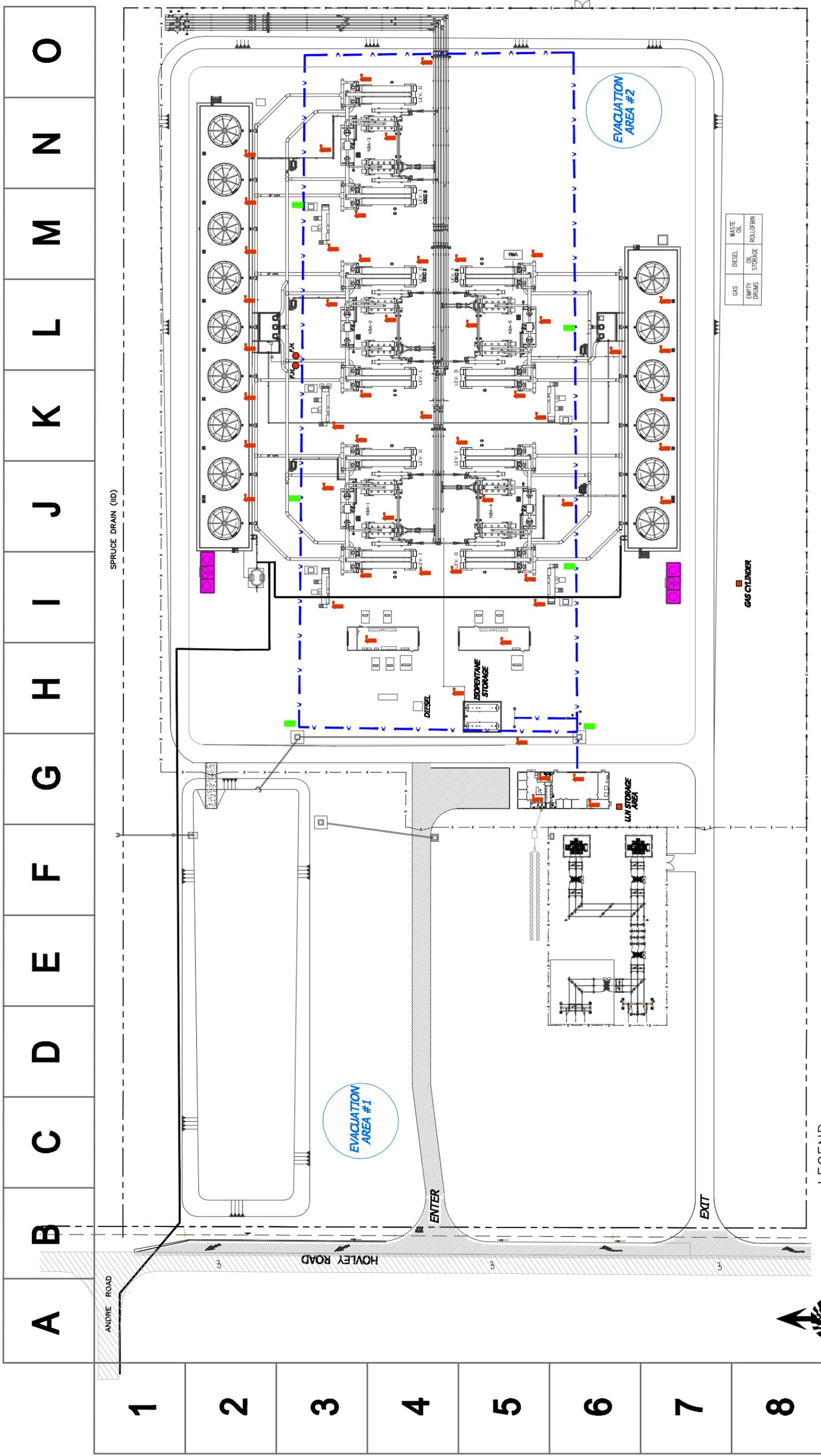
**Attachment 1**

**Response of Ormat Nevada, Inc. to CURE Data Requests Set 1,  
Data Request 11**

**11-CAI-02**

**(Map of perimeter fencing for North Brawley)**

# NORTH BRAWLEY GEOTHERMAL PLANT



**LEGEND**

- 10" HDPE
- 10" Make Up Line
- 10" Fire Line
- FIRE HYDRANT
- Fire Extinguisher
- Fire Monitor System
- Chemical Skid

GAS	EMPTY DRUMS	DIESEL ON STORAGE	WASTE OIL ROLLOFF
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SCALE: 1"=50'

SHEET 1  
OF 1 SHEETS  
DRAWN BY: E.B  
CHECKED BY:  
Date: 10/02/08

## General Plant



NORTH BRAWLEY GEOTHERMAL PLANT

**Attachment 2**

**Response of Ormat Nevada, Inc. to CURE Data Requests Set 1,  
Data Request 13**

**11-CAI-02**

**(Map of access and maintenance roads for the North Brawley project.)**



### LEGEND



Geothermal Pipeline: +

Production Well: ●

Injection Well: ■

Blowdown Well: ■

Proposed Production Well: ●

Proposed Injection Well: ■

Proposed Production  
or Injection Well: ●



0 1,000 2,000  
Feet

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 Responses to CURE Data Requests, Set 1 and Set 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**

Ormat Nevada, Inc.  
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Reno, NV 89511

**COUNSEL FOR RESPONDENT**

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**COMPLAINANT**

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**INTERESTED**  
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El Centro, CA 92243

Imperial County Air Pollution  
Control District  
150 South 9th Street  
El Centro, CA 92243-2801

Imperial Irrigation District  
333 E. Barioni Boulevard  
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