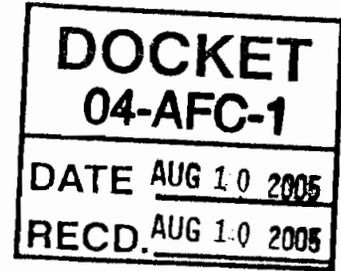


STATE OF CALIFORNIA  
Energy Resources Conservation  
and Development Commission



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

Docket No. 04-AFC-1

**APPLICANT'S 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 the following 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).

The City objects to all of the data requests on the grounds that the period for discovery has concluded. The May 19 interim scheduling order sets forth June 24 as the deadline for the submission of data requests by intervenors. A June 23 ruling denied the motion to extend discovery filed by Californians for Renewable Energy. Prior to the conclusion of the discovery period, the City responded to a multitude of data requests by Commission staff and intervenors, including a request requiring extensive document searches by SF Power. In these circumstances, the City objects to the further discovery requests by SF Power.

The City notes further that some of the information requested in the data requests, such as a documentation of the mitigation required in other cases, involves compiling publicly available information that is just as accessible to SF Power as it is to the City. Further, SF Power will have additional avenues to learn more about the City's proposed mitigation and community benefits programs through participation in workshops to follow issuance of the Preliminary Staff Assessment and through the participation of the Executive Director of SF Power on the Power Plant Task Force. The Power Plant Task Force is a formal citizen advisory committee created by resolution to advise the Board of Supervisors on the power plant issues. It regularly asks City staff to report on different aspects of the SFERP and City Staff regularly complies with such requests.

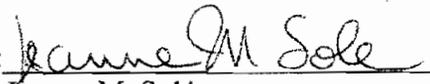
Dated: August 10, 2005

Respectfully submitted,

DENNIS J. HERRERA  
CITY ATTORNEY  
THERESA L. MUELLER  
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Energy Resources Conservation  
and Development Commission

Application for Certification for the )  
SAN FRANCISCO ELECTRIC RELIABILITY )  
PROJECT (SFERP) )  
\_\_\_\_\_ )  
 )

Docket No. 04-AFC-1

**PROOF OF SERVICE**

I, Kiana Davis, declare that on August 10, 2005, I deposited copies of the attached  
**APPLICANT'S OBJECTIONS TO THE SECOND SET OF DATA REQUESTS OF  
THE SAN FRANCISCO COMMUNITY POWER COOPERATIVE**

in the United States mail in San Francisco, California, with first-class postage  
thereon fully prepaid and addressed to all parties on the attached service list.

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

*Kiana Davis*

\_\_\_\_\_  
Kiana Davis

SERVICE LIST

<p>Barbara Hale, Power Policy Manager  San Francisco Public Utilities Commission  1155 Market Street, 4th Floor  San Francisco, CA 94102</p>	<p>Applicant Project Manager  Karen Kubick  SF Public Utilities Commission  1155 Market St., 8th Floor  San Francisco, CA 94103</p>
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<p>Lynne Brown - Member, CARE  Resident, Bayview Hunters Point  24 Harbor Road  San Francisco, California 94124</p>	<p>Emilio Varanini III  Special Counsel  California Power Authority  717 K Street, Suite 217  Sacramento, CA 95814</p>
<p>Electricity Oversight Board  770 L Street, Suite 1250  Sacramento, CA 95814</p>	<p>Independent System Operator  Jeffery Miller  151 Blue Ravine Road  Folsom, CA 95630</p>
<p>Department of Water Resources  SERS  Dave Alexander  3301 El Camino Avenue, Ste. 120  Sacramento, CA 95821-9001</p>	<p>Jeffrey S. Russell  Vice President, West Region Operations  Mirant California, LLC  1350 Treat Blvd., Suite 500  Walnut Creek, CA 94597</p>
<p>Michael J. Carroll  Latham &amp; Watkins LLP  650 Town Center Drive, Suite 2000  Costa Mesa, CA 92626</p>	<p>Potrero Boosters Neighborhood  Association  Dogpatch Neighborhood Association  Joseph Boss  934 Minnesota Street  San Francisco, CA 94107</p>
<p>Robert Sarvey  501 West Grantline Road  Tracy, CA 95376</p>	<p>Greenaction for Health &amp; Environmental  Justice  c/o Marc Harrison  Karl Krupp  One Hallidie Plaza #760  San Francisco, CA 94706</p>
<p>San Francisco Community Power  c/o Steven Moss  2325 Third Street # 344  San Francisco, CA 94107</p>	<p>Californians for Renewable Energy, Inc.  (CARE)  Michael E. Boyd, President  5439 Soquel Drive  Soquel, California 95073</p>