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

REQUEST FOR SUBPOENA OF MANHO YEUNG PG&E

TO: Commissioner Boyd

Pursuant to Title 20 C.C.R.§ 1203 (b), Intervenor CAlifornians for Renewable Energy (CARE) hereby applies to the Committee for issuance of a subpoena by the Commission compelling the attendance of Manho Yeung, Manager Transmission Planning, Pacific Gas and Electric Company, at the next scheduled hearing of this matter relating to the topic of alternatives , on March 22, 2006 at 9:00 a.m.. This request is based on the following facts.

1. Name of Witness:
   Manho Yeung, Manager
   Transmission Planning
   245 Market Street, Room 327
   Mailing Address
   Mail Code N38
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DOCKET
04-AFC-1
DATE MAY 11 2006
RECD. MAY 12 2006

2. Materiality: As set forth in greater detail below, Mr. Yeung's testimony is necessary and material to rebut a number of incorrect statements made by Staffs expert Lawrence Tobias during Mr. Tobias testimony on May 1, 2006 on issues related to local system effects. Mr. Tobias's testimony is in fact based on system impact studies conducted by PG&E who is Mr. Yeung's employer. The local systems effects are critical to the siting of this project as the CAL-ISO action plan will eliminate 385 MW of in city generation and leave the SFERP as the sole generation North of the Martin substation

3. Necessity: Mr. Tobias testimony is based on system impact studies prepared by PG&E. Mr. Tobias has provided conflicting testimony in these proceedings. Mr. Tobias has stated that the CA-ISO Action Plan must have a firm 100 MW of in City generation for reliability purposes. Under cross-examination by Intervenor Sarvey Mr. Tobias has

now stated that 95.1 MW is all that is necessary for reliability in San Francisco. CAL-ISO has previously stated that only generation located north of the Martin Substation can qualify as in city generation for reliability purposes, now Mr. Tibias is counting a turbine located at the SFIA as eligible for this 100 MW in city generation requirement. Mr. Yeung as PG&E's expert on transmission impacts is uniquely qualified to inform the committee on the true nature of the transmission impacts of the CA-ISO action plan and local system effects and alternatives to the SFERP. Mr. Yeung has conducted research and testified on these transmission impacts and alternatives in issues related to these matters in PG&E Application to CPUC for the approval of the Jefferson Martin 230 KV transmission line and in other evidentiary hearings before the CPUC and elsewhere. Mr. Yeung as PG&E's lead transmission specialist is uniquely qualified to testify as to the impacts of the proposed SFERP. CARE has already entered portions of this testimony in the Jefferson Martin case into the record. CARE has requested that PG&E make Mr. Yeung available but due to the sensitive relationship between PG&E and CAL-ISO CARE believes that Mr. Yeung must be subpoenaed as PG&E has failed to respond to CARE's requests in the past. The subpoena will not cause Mr. Yeung or any other party to these proceedings any undue hardship Based on the reasons set forth in this request, good cause exists for the issuance of the subpoena because the testimony of Mr. Yeung is critical to these proceedings as the Committee must decide whether this project and the associated CAL-ISO Action Plan will actually provide the reliability benefits that are now in question. CARE has no other way to procure the testimony. Accordingly, CARE respectfully requests the issuance of a subpoena to compel Mr. Yeung's attendance at the next scheduled Alternatives hearing in this matter on May 22, 2006.

Respectfully submitted,

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May 11th 2006\

Cc. Robert L. Harris VP Environmental Affairs PG&E

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