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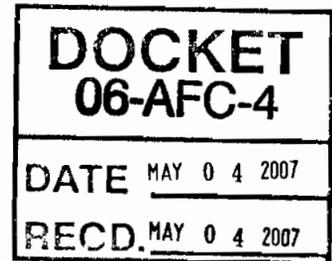
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May 4, 2007

File No. 037484-0006

**VIA FEDEX**

CALIFORNIA ENERGY COMMISSION  
Attn: Docket No. 06-AFC-4  
1516 Ninth Street, MS-4  
Sacramento, California 95814-5512



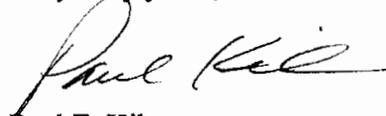
Re: Vernon Power Plant Project: Docket No. 06-AFC-4

Dear Sir/Madam:

Pursuant to California Code of Regulations, title 20, sections 1209, 1209.5, and 1210, enclosed herewith for filing please find Applicant's Request for Clarification and Tentative Request for Additional Time to Respond to CEC Data Requests 60 through 74.

Please note that the enclosed submittal was filed today via electronic mail to your attention and to all parties on the CEC's current electronic proof of service list.

Very truly yours,



Paul E. Kihm  
Senior Paralegal

Enclosure

cc: CEC 06-AFC-4 Proof of Service List (w/ encl. via e-mail)  
Michael J. Carroll, Esq. (w/ encl.)

**STATE OF CALIFORNIA  
ENERGY RESOURCES  
CONSERVATION AND DEVELOPMENT COMMISSION**

In the Matter of:	)	Docket No. 06-AFC-4
	)	
Application for Certification, for the VERNON POWER PLANT PROJECT by the City of Vernon	)	<b>ELECTRONIC PROOF OF SERVICE LIST</b>
	)	(Revised May 1, 2007)
_____	)	

Transmission via electronic mail and by depositing one original signed document with FedEx overnight mail delivery service at Costa Mesa, California with delivery fees thereon fully prepaid and addressed to the following:

DOCKET UNIT

**CALIFORNIA ENERGY COMMISSION**

Attn: DOCKET NO. 06-AFC-4  
1516 Ninth Street, MS-4  
Sacramento, California 95814-5512  
[docket@energy.state.ca.us](mailto:docket@energy.state.ca.us)

Transmission via electronic mail addressed to the following:

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VERNON POWER PLANT PROJECT  
CEC Docket No. 06-AFC-4

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VERNON POWER PLANT PROJECT  
CEC Docket No. 06-AFC-4

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VERNON POWER PLANT PROJECT  
CEC Docket No. 06-AFC-4

ENERGY COMMISSION

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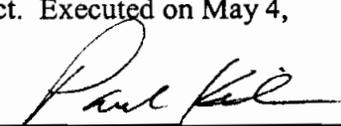
DECLARATION OF SERVICE

I, Paul Kihm, declare that on May 4, 2007, I deposited the required original signed copy of the attached:

**APPLICANT'S REQUEST FOR CLARIFICATION AND TENTATIVE REQUEST FOR ADDITIONAL TIME TO RESPOND TO CEC DATA REQUESTS 60-74**

with FedEx overnight mail delivery service at Costa Mesa, California with delivery fees thereon fully prepaid and addressed to the California Energy Commission. I further declare that transmission via electronic mail was consistent with the requirements of California Code of Regulations, title 20, sections 1209, 1209.5, and 1210. All electronic copies were sent to all those identified on the Proof of Service List above.

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 4, 2007, at Costa Mesa, California.

  
\_\_\_\_\_  
Paul Kihm

STATE OF CALIFORNIA  
ENERGY RESOURCES  
CONSERVATION AND DEVELOPMENT COMMISSION

In the Matter of:	)	Docket No. 06-AFC-4
	)	
Application for Certification, for the VERNON POWER PLANT PROJECT by The City of Vernon	)	APPLICANT'S REQUEST FOR CLARIFICATION AND TENTATIVE REQUEST FOR ADDITIONAL TIME TO RESPOND TO CEC DATA REQUESTS 60 THROUGH 74

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California Energy Commission staff filed and served Data Requests 60 through 74 on April 24, 2007. Applicant hereby requests clarification regarding the scope of certain of the Data Requests, and pending receipt of such clarification, tentatively requests additional time to respond to certain of the Data Requests pursuant to California Code of Regulations Title 20, Section 1716(f).

With respect to Data Requests 69 through 74 (Transmission System Engineering), Vernon believes that it can provide complete technical answers that will meet CEC needs prior to the May 24, 2007 deadline. However, depending on the interpretation, several of the Data Requests might suggest the need for complex extended studies involving multiple parties. Specifically, if Data Requests 70(a), (b) and (c) and 71(a), (b) and (c) are interpreted to include information exceeding that typically required in other Los Angeles area interconnection studies, planning studies, or good utility practice, these requests could involve extensive studies taking 120 days or more to complete. Vernon is therefore seeking clarification from staff as to the intended scope of these Data Requests.

Depending on the intended scope of the subject Data Requests, Vernon may require additional time beyond the May 24, 2007 deadline to respond.

DATED: May 4, 2007

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Mike Carroll", written in a cursive style.

Michael J. Carroll  
of LATHAM & WATKINS LLP  
Counsel to Applicant