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February 2, 2009

DOCKET
07-AFC-6
DATE FEB 02 2009
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VIA Fed-X

San Diego Gas & Electric Company
c/o Mr. Taylor Miller
Sempra Energy
925 L Street, Suite 650
Sacramento, CA 95814

Re: Data Requests on Carlsbad Energy Center Project's Use of SDG&E-Supplied Natural Gas, Docket No. 07-AFC-6

Dear Mr. Miller:

Ms. Elena Miller, the Public Adviser with the California Energy Commission, informed us that you are authorized to receive service for San Diego Gas & Electric Company. Enclosed are data requests related to the Carlsbad Energy Center Project before the California Energy Commission.

Sincerely,

William Rostov

William Rostov
Attorney for Intervenor
Center for Biological Diversity

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CENTER FOR BIOLOGICAL DIVERSITY

STATE OF CALIFORNIA
State Energy Resources
Conservation and Development Commission

In the Matter of:	)	Docket No. 07-AFC-6
	)	
	)	CENTER FOR
APPLICATION FOR CERTIFICATION	)	BIOLOGICAL
of the CARLSBAD ENERGY CENTER	)	DIVERSITY'S DATA
PROJECT	)	REQUESTS TO SAN
	)	DIEGO GAS & ELECTRIC
	)	

Intervenor Center for Biological Diversity ("the Center") hereby submits this first set of Data Requests to San Diego Gas & Electric ("SDG&E") pursuant 20 Cal. Code Reg. § 1716(h). Any objections or statements of inability to comply with the request must be filed in writing with the Committee and with the Center within 20 days of receipt of this request. 20 Cal. Code Reg. § 1716(f).

Dated: February 2, 2009

William Rostov
Attorney for Intervenor Center for Biological Diversity

Technical Area: Air Quality

Background

The California Global Warming Solutions Act of 2006 (AB 32) and related Executive Orders have set aggressive goals for the State to significantly reduce its greenhouse gas emissions over the next several decades. This includes attention to emissions generated outside the state by power that is ultimately used in California. In addition, the California Environmental Quality Act requires analysis of the environmental effects of the use of LNG at the Carlsbad Energy Center Project ("CECP" or "project").

The San Diego Air Pollution Control District noted in its October 17, 2007 information request that, "It is likely that the project may be operated continuously or intermittently on natural gas derived from imported liquefied natural gas (LNG)." The processes necessary to convert and transport LNG are very energy intensive and could significantly increase California's current emissions from domestic sources of natural gas. Information about the use LNG at the project is fundamental to understanding the environmental impacts from this project.

On September 26, 2008, the Center issued Data Requests to Carlsbad Energy Center, LLC seeking, *inter alia*, information on the project's possible use of LNG supplied by SDG&E. On December 26, 2008, the California Energy Commission's Carlsbad AFC Committee ruled that the Applicant lacked the information necessary to answer such requests. (See Committee Ruling on Intervenor Center for Biological Diversity's Petition to Compel Data Responses (Dec. 26, 2008) at 3, attached). The Commission's Order specifically stated that information related to LNG was "best requested of San Diego Gas and Electric (SDG&E) the provider of natural gas to the project." (*Id.*) Pursuant to 20 Cal. Code Reg. Section 1716(h), the Center requests the following information from SDG&E:

1. Will the CECP be supplied with LNG?

2. If so, please estimate the amount of LNG the CECP will be delivered on an annual basis for the estimated lifetime of the project, which is 40 years.

3. What are the factors that would dictate "intermittent" or "continuous" use of LNG?

4. What is the method for calculating how much LNG will go to the CECP?

5. Please identify the LNG terminal that will provide gas for the CECP. Please list the country or countries of origin of the LNG to be shipped to this terminal. Estimate the relative amount of LNG that will transported from each country of origin.

6. How much LNG has SDG&E already received that has gone into the SDG&E pipeline?

7. Does SDG&E expect any additional LNG terminals to be supplying additional LNG to the SDG&E pipeline during the forty year lifetime of the project?

BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT COMMISSION OF THE STATE OF CALIFORNIA
1516 NINTH STREET, SACRAMENTO, CA 95814
1-800-822-6228 – WWW.ENERGY.CA.GOV

APPLICATION FOR CERTIFICATION FOR THE *CARLSBAD ENERGY CENTER PROJECT*

Docket No. 07-AFC-6
PROOF OF SERVICE
(Revised 1/12/2009)

CALIFORNIA ENERGY COMMISSION
Attn: Docket No. 07-AFC-6
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DECLARATION OF SERVICE

I, Jessie Baird, declare that on February 2, 2009, I transmitted a copy of the attached, via electronic mail, consistent with the requirements of California Code of Regulations, title 20, sections 1209, 1209.5, and 1210. 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.

Jae Baird

Attachment