

From: Warner, Christopher (Law)

Sent: Tuesday, April 29, 2014 8:49 AM

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ALJ_Support ID

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 Subject: RE: A.12-01-008; A.12-04-020; A.14-01-007 (Consolidated) (Phase 1) - Service of PG&E Procedural Email to ALJ Clark and Sierra Club/California Clean Energy Committee

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From: Warner, Christopher (Law)
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 Subject: A.12-04-020 - Notification of Potential Motion for Exclusion of Testimony and Sanctions for Failure to Respond to Discovery

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PACIFIC GAS AND ELECTRIC COMPANY
 Green Option Program
 Application 12-04-020
 Data Response

PG&E Data Request No.:	PGE_Joint_001		
PG&E File Name:	GreenOptionProgram_DR_PGE_Joint_001		
Request Date:	April 4, 2014	Requester DRNo.:	001
Due Date:	April 18, 2014	Responding Party:	California Clean Energy Committee; Sierra Club

QUESTION 1

Please identify the source and amounts of any funds or contributions received by the Sierra Club and California Clean Energy Committee in 2014, 2013 and 2012 from renewable energy or other energy companies or entities or non-profit entities or individuals which advocate in support of renewable energy or other energy sources.

ANSWER 1

QUESTION 2

Please identify all members of the California Clean Energy Committee which are individuals or entities engaged in the promotion, development, sale or leasing of renewable energy or renewable energy facilities.

ANSWER 2

QUESTION 3

Please provide a copy of the articles of incorporation, by-laws and charter of the California Clean Energy Committee, and federal and state tax returns filed by the California Clean Energy Committee for the calendar years 2010, 2011, and 2012.

ANSWER 3

QUESTION 4

For witness Matt Cheney: Please provide copies of all written or electronic communications since January 1, 2012 to or from representatives, employees, consultants, or elected officials of the City of Davis regarding this proceeding and PG&E's application and proposals in this proceeding.

ANSWER 4

QUESTION 5

For witness Matt Cheney: Please provide copies of all written or electronic communications since January 1, 2012 to or from California Senator Wolk or staff, consultants or representatives of Senator Wolk regarding SB43, the PVUSA project, Clean Energy Assets, LLC, this proceeding, or PG&E's application and proposals in this proceeding.

ANSWER 5

QUESTION 6

For witness Matt Cheney: Please identify all individuals or entities who reviewed your draft testimony other than members or representatives of the Sierra Club or California Clean Energy Committee.

ANSWER 6

QUESTION 7

For witness Matt Cheney: Please identify and quantify all income, revenues, payments, tax credits or other monetary payments Clean Energy Assets LLC has received from the PVUSA project or any other renewable energy project for the ten years 2004- 2013.

ANSWER 7

QUESTION 8

For witness Matt Cheney: Please identify any factual evidence in the record of this proceeding or in your testimony that would support the following statement in your testimony regarding the long-term Power Purchase Agreements PG&E proposes to enter into directly with solar developers for new solar energy projects under PG&E's GTSR program: "Projects will not be developed if developers, and more importantly their financial partners will not finance projects, if they cannot see clearly the revenue stream required for project economic performance over a period of 20 years or more. It is not even up to the developers."

ANSWER 8

QUESTION 9

For witness Richard McCann: Please identify all individuals or entities who reviewed your draft testimony other than members or representatives of the Sierra Club or California Clean Energy Committee.

ANSWER 9

QUESTION 10

For witness Richard McCann: Please provide copies of all written or electronic communications since January 1, 2012 to or from California Senator Wolk or staff, consultants or representatives of Senator Wolk regarding SB 43, the PVUSA project, Clean Energy Assets, LLC, this proceeding, or PG&E's application and proposals in this proceeding.

ANSWER 10

QUESTION 11

For witness Richard McCann: Please provide copies of all written or electronic communications since January 1, 2012 to or from representatives, employees, consultants, or elected officials of the City of Davis regarding this proceeding and PG&E's application and proposals in this proceeding.

ANSWER 11

QUESTION 12

For witness Richard McCann: Please identify and describe any consulting agreements or employment you have had with commercial or residential real estate developers.

ANSWER 12

QUESTION 13

For witness Matt Cheney: Of the 39 community shared renewables programs that Mr. Cheney references on page 3, please identify the specific programs where the power price is negotiated directly between the developer and customer, in a manner similar to the type of program that Mr. Cheney is advocating should be adopted in this proceeding.”?

ANSWER 13