Request #19-339

As of July 21, 2019, 6:10pm

Details

Re: Public Records Act Request Elkhorn Battery Energy Storage Facility (File No. PLN180371)

Dear Public Records Act Coordinator:

We are writing on behalf of California Unions for Reliable Energy ("CURE") to request a copy of any and all records related to the Elkhorn Battery Energy Storage Facility (File No. PLN180371) ("Project"), proposed by Pacific Gas and Electric Company/Tesla, Inc. ("PG&E/Tesla"). PG&E/Tesla proposes to install a 186.2 megawatt, four hour lithium ion battery energy storage system (BESS) at the Moss Landing Power Plant in Moss Landing, California. The Project site is located at 7251 Highway 1 (Assessor's Parcel Number 133 181 011 000). The BESS will be designed, constructed, and maintained by Tesla and will be owned and operated by PG&E.

For this request, the term "records" refers to, but is not limited to, any and all documents, correspondence (including, but not limited to, inter and/or intra agency correspondence as well as correspondence with entities or individuals outside the federal government), resolutions, memos, analyses, emails, letters, notes, recordings, telephone records, voicemails, telephone notes, telephone logs, text messages, chat messages, minutes, memoranda, comments, files, presentations, consultations, biological opinions, assessments, evaluations, schedules, papers published and/or unpublished, reports, studies, photographs and other images, data (including raw data, GPS or GIS data, UTM, LiDAR, etc.), maps, charts and/or all other responsive records, in draft or final form.

This request is made pursuant to the California Public Records Act. (Government Code §§ 6250, et seq.) This request is also made pursuant to Article I, section 3(b) of the California Constitution, which provides a Constitutional right of access to information concerning the conduct of government. Article I, section 3(b) provides that any statutory right to information shall be broadly construed to provide the greatest access to government information and further requires that any statute that limits the right of access to information shall be narrowly construed.

We will pay for any direct costs of duplication associated with filling this request up to \$200. However, please contact me at (650) 589 1660 with a cost estimate before copying/scanning the materials.

Pursuant to Government Code Section 6253.9, if the requested documents are in electronic format and are 10 MB or less (or can be easily broken into sections of 10 MB or less), please email them to me as attachments. We request that the County provide records in a readily accessible electronic format. "Readily accessible" means text searchable and OCR formatted. Please provide all records in a readily accessible, electronic .pdf format. Additionally, please provide the records either in (1) load ready format with a CSV file index or excel spreadsheet, or if that is not possible; (2) in .pdf format, without any "profiles" or "embedded files." Profiles and embedded files within files are not readily accessible. Please do not provide the records in a single, or "batched," .pdf file.

My contact information is: U.**S. M**a**il** Sheila M. Sannadan Adams Broadwell Joseph & Cardozo 601 Gateway Boulevard, Suite 1000 South San Francisco, CA 94080 7037

Em**ai**l ssannadan@adamsbroadwell.com

Please call me at (650) 589 1660 if you have any questions. Thank you for your assistance with this matter.

Sincerely, Sheila M. Sannadan Legal Assistant

<u>Read less</u>

Received July 2, 2019 via web

Departments

Legal Public Records Act

Documents

(none)

Staff

Point of Contact
Public Records

Timeline

| Re q uest Pu b lished July 2, 2019, 3:34pm | Public |
|---|--------|
| Depa rt ment As sig nment Added: Legal Public Records Act. <i>July 2, 2019, 3:34pm</i> | Public |
| Request Opened Request received via web <i>July 2, 2019, 3:22pm</i> | Public |