

ADAMS BROADWELL JOSEPH & CARDOZO

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

601 GATEWAY BOULEVARD, SUITE 1000  
SOUTH SAN FRANCISCO, CA 94080-7037

TEL: (650) 589-1660  
FAX: (650) 589-5062

lhorton@adamsbroadwell.com

SACRAMENTO OFFICE

520 CAPITOL MALL, SUITE 350  
SACRAMENTO, CA 95814-4721

TEL: (916) 444-6201  
FAX: (916) 444-6209

DANIEL L. CARDOZO  
CHRISTINA M. CARO  
THOMAS A. ENSLOW  
TANYA A. GULESSERIAN  
LAURA E. HORTON  
MARC D. JOSEPH  
RACHAEL E. KOSS  
JAMIE L. MAULDIN  
ADAM J. REGELE  
ELLEN L. WEHR

June 25, 2015

**Via U.S. Mail and Electronic Mail**

Andrew Barnsdale  
California Public Utilities Commission  
c/o Environmental Science Associates  
550 Kearny Street, Suite 800  
San Francisco, CA 94108  
**Email:** [bca@cpuc.ca.gov](mailto:bca@cpuc.ca.gov)  
[mpwsp-eir@esassoc.com](mailto:mpwsp-eir@esassoc.com)

**CC Email only:**

Eric Zigas, [EZigas@esassoc.com](mailto:EZigas@esassoc.com)  
Jonathan Koltz, [Jonathan.Koltz@cpuc.ca.gov](mailto:Jonathan.Koltz@cpuc.ca.gov)  
Sarah Thomas, [sarah.thomas@cpuc.ca.gov](mailto:sarah.thomas@cpuc.ca.gov)  
Anna Shimko, [ashimko@bwsllaw.com](mailto:ashimko@bwsllaw.com)  
Kelly White, [KWhite@esassoc.com](mailto:KWhite@esassoc.com)

**Re: California Public Records Act Request – CalAm Monterey  
Peninsula Water Supply Project**

Dear Mr. Barnsdale, Mr. Zigas, Mr. Koltz, Ms. Thomas, Ms. Shimko and Ms. White:

We are writing on behalf of the **California Unions for Reliable Energy** to request a copy of the unlocked Excel spreadsheet(s) that support the emission calculations in Appendix G of the DEIR ("Document") for the CalAm Monterey Peninsula Water Supply Project.<sup>1</sup> On May 21, 2015, we previously requested immediate access to any and all documents referenced or relied upon in the DEIR, pursuant to CEQA. On June 17, we followed up on our May 21 letter requesting the Document. However, the CPUC and its consultants informed us that they would not release the Document(s) because they do not believe CEQA requires them to do so. Although we believe CEQA does require release of the Document, this letter

<sup>1</sup> <http://www.cpuc.ca.gov/Environment/info/esa/mpwsp/index.html>.  
1840-026cv

June 25, 2015

Page 2

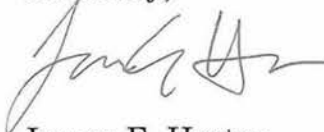
serves to clarify that we also seek the Document pursuant to the California Public Records Act. (Government Code §§ 6250, et seq.)

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.

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.

Please call me at the contact information listed above if you have any questions. Thank you for your assistance with this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Laura E. Horton', written in a cursive style.

Laura E. Horton

LEH:clv