

EXHIBIT A

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

ANTELOPE VALLEY GROUNDWATER CASES

INCLUDED ACTIONS:

LOS ANGELES COUNTY WATERWORKS
DISTRICT NO. 40 v. DIAMOND FARMING
COMPANY, Superior Court of California, County
of Los Angeles, Case No. BC 325201;

LOS ANGELES COUNTY WATERWORKS
DISTRICT NO. 40 v. DIAMOND FARMING
COMPANY, Superior Court of California, County
of Kern, Case No. S-1500-CV-254-348;

WM. BOLTHOUSE FARMS, INC., v. CITY OF
LANCASTER, DIAMOND FARMING CO. v.
CITY OF LANCASTER, DIAMOND FARMING
CO. v. CITY OF PALMDALE WATER
DISTRICT, Superior Court of California, County of
Riverside, Consolidated Actions, Case Nos. RIC 344
436, RIC 344 668 and RIC 353 840

Judicial Council Coordination No. 4408

Santa Clara Case No. 1-05-CV-049053
Assigned to The Honorable Jack Komar

**DECLARATION OF KEITH LATHAM
IN SUPPORT OF NRG SOLAR
ALPINE, LLC'S RESPONSES TO
DISCOVERY ORDER FOR PHASE IV
TRIAL**

1 I, Keith Latham, declare as follows:

2 1. I am the Vice President, Development for NRG Solar LLC, which is the
3 controlling member of NRG Solar Alpine LLC ("NRG"). Since 2009, I have been the
4 lead developer on NRG's construction of a photovoltaic solar-power facility that will
5 generate up to 66 megawatts of power ("Project"). The Project is located on
6 approximately 600 acres of land in northern Los Angeles County northwest of Lancaster,
7 California, near the Neenach Substation ("Site"). The following statements are based on
8 my own personal knowledge or on information and belief, and if called as a witness in any
9 proceeding, I could and would testify competently thereto.

10 2. The construction of the Project was ongoing during the years 2011 and
11 2012. Construction of the Project will be completed in the spring of 2013.

12 3. Permits for the construction of the Project allowed NRG to pump up to 150
13 acre feet per year ("AFY") of groundwater. During the years 2011 and 2012,
14 approximately 125 AFY of groundwater was used on the Site each year for dust control,
15 soil stabilization/conditioning, and other construction purposes. The groundwater used on
16 the Site was pumped from a well located on the Site.

17 4. Based on my experience with this project, two (2) AFY of groundwater will
18 be needed to operate the Project. This groundwater can be obtained from the on-Site well,
19 and will be used for domestic purposes in the operations and maintenance building, for the
20 irrigation of approximately 10 acres of visual screening landscaping that is required to be
21 planted around the Site pursuant to an agreement with area residents, and for the cleaning
22 of solar modules or other operational uses. An additional 22 AFY of groundwater will be
23 needed for the first three to five years to establish the required screening landscape.

24 I declare under penalty of perjury under the laws of the State of California that the
25 foregoing is true and correct based upon my information and belief. This declaration was
26 executed this 21 day of December, 2012, at Carlsbad, California.

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