

## DOCKETED

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<b>Project Title:</b>	Puente Power Project
<b>TN #:</b>	205810
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STATE OF CALIFORNIA  
ENERGY RESOURCES  
CONSERVATION AND DEVELOPMENT COMMISSION

In the Matter of:	)	Docket No. 15-AFC-01
	)	
APPLICATION FOR CERTIFICATION FOR	)	OBJECTIONS TO CITY OF OXNARD'S
THE PUENTE POWER PROJECT	)	DATA REQUESTS, SET 1
	)	
	)	
	)	

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On August 4, 2015, the City of Oxnard issued its Data Requests, Set 1 (Nos. 1-46) (City Data Requests) to Applicant for the Puente Power Project (Project). On behalf of the Applicant, we hereby object to certain of the City Data Requests pursuant to Title 20, California Code of Regulations, section 1716(f). The specific Data Requests to which Applicant objects, and the bases for such objections are set forth below.

City Data Request 1

City Data Request 1 seeks “all information provided in response to CEC Data Request 2.” (See CEC Data Request, Set 1, July 17, 2015, TN# 205389). In addition, to the extent not covered by CEC Data Request 2, City Data Request 1 seeks “all Excel spreadsheets used to support the emission estimates in the AFC, Appendices C-2, C-6, and C-8, in their native electronic format and unprotected (i.e., showing formulas) . . .”

For the sake of clarity, note that City Data Request 1 incorrectly states that CEC Data Request 2 requested spreadsheet files for Appendix C-2 and C-8. In fact, CEC Data Request 2 requested spreadsheet files for Appendix C-2 and C-6. In any event, Applicant understands City Data Request 1, taken in its entirety, to be seeking all Excel spreadsheets used to support the emission estimates in AFC Appendices C-2, C-6, and C-8, in their native electronic format and unprotected.

As it pertains to the spreadsheet files used to support the emission estimates in AFC Appendix C-6, as indicated in Applicant's response to CEC Data Request 2, the requested spreadsheet files were docketed with the CEC as part of the AFC (See, AFC Appendix C, April 15, 2015, TN# 204220-3). Thus, this information is already available to the City.

As it pertains to the spreadsheet files used to support the emission estimates in AFC Appendices C-2 and C-8, Applicant objects to City Data Request 1 on the basis that the requested information constitutes confidential trade secrets and proprietary information (See Application for Confidential Designation of Applicant's Response to CEC Data Request 2, August 17, 2015, TN# 205762).

### City Data Request 2

City Data Request 2 is a "catchall" data request that seeks "all responses and data produced in response to staff and intervenor data requests for all issues."

As it pertains to any past or future data request to which Applicant objects, or to any past or future data request to which Applicant responds subject to an Application for Confidential Designation, or to any past or future data request to which Applicant responds in any other qualified or conditional manner, Applicant objects to City Data Request 2 on the same basis as set forth in the objection, Application for Confidential Designation, or qualified or conditional response provided in connection with such past or future data request.

### City Data Request 3

City Data Request 3 seeks a copy of the NRG Generation Unit Repowering request submitted to the California Independent System Operator (CAISO) on December 13, 2013, and certain specified related information.

Applicant objects to City Data Request 3 on the basis that some or all of the requested information is confidential or otherwise protected from disclosure. Applicant will provide any responsive, non-confidential and otherwise unprotected information in its possession to the extent that there is any.

### City Data Request 4

City Data Request 4 seeks a copy of the Resource Adequacy Purchase Agreement (RAPA) bid and all related documents, including all correspondence with Southern California Edison (SCE).

Applicant objects to City Data Request 4 on the basis that some or all of the requested information is confidential or otherwise protected from disclosure. Applicant will provide any responsive, non-confidential and otherwise unprotected information in its possession to the extent that there is any.

### City Data Request 41

City Data Request 41 seeks all communications between the turbine vendor and the Applicant regarding in stack NO<sub>2</sub>/NO<sub>x</sub> ratios, including supporting test data.

Applicant objects to City Data Request 41 on the basis that some or all of the requested information is confidential or otherwise protected from disclosure. Applicant will provide any responsive, non-confidential and otherwise unprotected information in its possession to the extent that there is any.

DATED: August 24, 2015

Respectfully submitted,

*/s/ Michael J. Carroll*

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