

DOCKETED

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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) APPLICANT’S RESPONSE TO MOTION
THE PUENTE POWER PROJECT) TO FIND GOOD CAUSE AND
) PROPOSED REVISED SCHEDULE
)
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_____)

Additional Data Requests

Applicant hereby responds to California Energy Commission (CEC) Staff’s Motion to Find Good Cause filed on October 10, 2016 (TN #213944) (Motion) requesting that the Committee find good cause to allow for an extension of the discovery period so that CEC Staff may submit Data Requests to Applicant regarding two proposed changes to the Puente Power Project (Project). As it indicated during the Committee Status Conference on September 27, 2016, Applicant does not object to responding to Data Requests from the parties related to the subject changes to the Project, and therefore does not oppose the Motion, subject to the following:

- Consistent with the Motion, any additional Data Requests are limited to the “Refinement to Transmission Interconnection” (Transmission Refinement) filed on August 26, 2016 (TN #213000/213002), and the “Project Enhancement – Outfall Removal and Beach Restoration” (Outfall Removal) filed on September 26, 2016 (TN #213802); and
- The deadline for submitting Data Requests on the Transmission Refinement and the Outfall Removal is established as October 14, 2016.

Applicant believes that October 14, 2016 is an appropriate deadline for submitting additional Data Requests given that the Transmission Refinement and Outfall Removal were docketed with the CEC over 6 weeks and 2 weeks ago, respectively. Furthermore, at the Committee Status Conference on September 27, 2016, all parties were put on notice that there would be an

opportunity to submit additional Data Requests and that the timing associated with submitting and responding to the Data Requests would be expedited. CEC Staff has already submitted its Data Requests (TN # 213968), and Applicant hereby reaffirms its commitment made at the Status Conference to respond to all Data Requests within 15 days of submission.

Revised Schedule

Consistent with its comments during the Committee Status Conference on September 27, 2016, Applicant hereby submits its Proposed Revised Schedule. Strikethrough/Underline text indicates proposed changes to the currently approved Committee Schedule issued on July 22, 2016 (TN #212398). Applicant's proposed changes reflect the following:

- Adoption of revised FDOC issuance date of October 13, 2016;
- Incorporation of Data Requests on the Transmission Refinement and Outfall Removal;
- Adoption of CEC Staff's proposed FSA issuance date of November 18, 2016;
- Incorporation of FSA Workshop; and
- Adjustment of all subsequent dates to reflect the forgoing.

We respectfully request that the Committee issue a revised Committee Schedule as expeditiously as possible to ensure that all parties and agencies are aware of the revised deadlines for effectively participating in these proceedings. In particular, the deadlines associated with additional Data Requests must be established promptly to ensure that the Final Staff Assessment is released on a timely basis and the subsequent milestones are achieved as directed by the Committee.

DATED: October 11, 2016

Respectfully submitted,

/s/ Michael J. Carroll

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PUENTE POWER PROJECT

REVISED COMMITTEE SCHEDULE 15-AFC-01

ACTIVITY	DATE
Application for Certification submitted	April 15, 2015
Discovery Period Closes	March 7, 2016
Status Conference	March 28, 2016
VCAPCD Issues Preliminary Determination of Compliance (PDOC)	May 19, 2016
Parties File Status Reports	May 19, 2016
Staff Publishes Preliminary Staff Assessment (PSA)	June 17, 2016
Parties File Status Reports	June 24, 2016
PSA Workshop	July 21 – 22, 2016
VCAPCD Issues Final Determination of Compliance (FDOC)	Early September, 2016
California Coastal Commission Issues 30413(d) Report	September 14, 2016
Last Day to File Comments on PSA	September 15, 2016
Committee Conference on the PSA	Mid-September <u>27, 2016</u>
<u>Last Day to File Data Requests on Transmission Interconnection and Outfall Removal & Beach Restoration Refinements</u>	<u>October 14, 2016</u>
<u>VCAPCD Issues Final Determination of Compliance (FDOC)</u>	<u>October 13, 2016</u>
<u>Deadline for Responding to Data Requests on Transmission Interconnection and Outfall Removal & Beach Restoration Refinements</u>	<u>October 28, 2016</u>
Staff Issues Final Staff Assessment (FSA)	October 14, 2016 <u>November 18, 2016</u>
<u>FSA Workshop</u>	<u>December 5, 2016</u>
Last day to File Petition to Intervene ¹	November 4, 2016 <u>December 13, 2016</u>
All Parties File Opening Testimony	November 4, 2016 <u>December 13, 2016</u>
All Parties File Rebuttal Testimony, Prehearing Conference Statements, Exhibit Lists	November 14, 2016 <u>December 23, 2016</u>
Prehearing Conference (PHC)	November 21, 2016

¹ “A petition for intervention shall be filed no later than the deadline established by the presiding member, or if none is established, at least 30 days before the first evidentiary hearing in the proceeding.” Cal. Code Regs., tit. 20, § 1211.7, subd. (b).

	<u>January 3, 2017</u>
Evidentiary Hearings (EH)	Week of December 2016 <u>January 9, 2017</u>
Committee Files Presiding Member's Proposed Decision (PMPD)	Early March Late January 2017
Committee Conference on PMPD	Early April Late February 2017
Close of Public Comment Period on PMPD	Early April Late February 2017
Committee Files Errata or Revised PMPD	Late April Mid-March 2017
Energy Commission Final Decision	April 17 <u>May 10, 2017</u>