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STATE OF CALIFORNIA
ENERGY RESOURCES
CONSERVATION AND DEVELOPMENT COMMISSION

In the matter of:

Application for Certification of the
PUENTE POWER PROJECT

DOCKET NO. 15-AFC-01

**CITY OF OXNARD'S COMMENTS ON
PROPOSED SCHEDULE**

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The City of Oxnard submits the following comments on staff's November 2, 2016 proposed schedule for release of the Final Staff Assessment. The City does not object to staff's proposal to release the FSA on December 8. Contrary to NRG's arguments, it will not benefit either the parties or the public if the schedule for release of the FSA does not include sufficient time to address all of the comments received on the preliminary staff assessment, changes to the project, and information submitted as the result of additional data requests. The City also supports the proposal to hold a public workshop on the FSA.

Given that staff does not anticipate release of the FSA until December 8, the City reiterates its earlier request that the remainder of the schedule allow sufficient time for the parties to submit opening and rebuttal testimony. The City originally proposed the following schedule, tied to release of the FSA:

All Parties File Opening Testimony	Six weeks after release of FSA
All Parties File Rebuttal Testimony, Prehearing Conference Statements, Exhibit Lists	Three weeks after Opening Testimony
Prehearing Conference (PCH)	One week after Rebuttal Testimony
Evidentiary Hearings	Four weeks after Rebuttal Testimony

Allowing for six weeks to submit opening testimony is particularly important because release of the FSA is now planned for a time when the preparation and submission of testimony will fall over the winter holidays, when many people—including experts—will have previously planned vacations.

The City continues to believe that the Puente project presents many challenges that must be addressed before the Commission takes action. Short-changing the evidentiary process for evaluating the project on the front end will only complicate the Project's review. Therefore, the City requests that any revised scheduling order incorporate the timelines suggested above and provide an adequate opportunity for staff, the parties, and the public to fully review the Project and participate in the CEC's process.

DATED: November 10, 2016

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