

## DOCKETED

<b>Docket Number:</b>	15-AFC-01
<b>Project Title:</b>	Puente Power Project
<b>TN #:</b>	214478
<b>Document Title:</b>	Applicant's Response to Committee Memo regarding FSA Publication Date and Intervener Responses Thereto
<b>Description:</b>	N/A
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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
THE PUENTE POWER PROJECT	)	COMMITTEE MEMO REGARDING FSA
	)	PUBLICATION DATE AND
	)	INTERVENER RESPONSES THERETO
	)	

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On November 4, 2016, the Committee issued a memorandum requesting feedback from the parties on staff’s proposal to delay publication of the Final Staff Assessment (“FSA”) by nearly three weeks beyond the November 18, 2016 deadline established in the Revised Scheduling Order (TN #214372). At the time of the Committee request, Applicant had already objected to the proposed delay and explained the basis of its objection in its Supplement to Status Report No. 9 filed earlier that same day (TN #214369). In light of recent filings by the interveners, Applicant is compelled to clarify several points related to the FSA publication date:

- The November 18, 2016 publication date was proposed by the staff and established by the Committee **after** filing of the most recent Project enhancements, and **after** the Committee solicited input from the parties at the Committee Status Conference on September 27, 2016, and in written submissions thereafter, regarding the time necessary for publication of the FSA, **including** review of the Project enhancements; thus, additional time required to address the Project enhancements is already reflected in the November 18, 2016 publication date.
- As expected, interveners are supporting an FSA publication date close to the holidays, and then arguing that the holidays will preclude any further activity related to the Project until mid to late January; thus, what appears on its face as a three-week delay is, in fact, a much longer delay to the overall schedule.
- The Application for Certification was deemed data adequate 17 months ago, the Preliminary Staff Assessment was published five months ago, and the public review period for every document subject to public review (e.g., PSA, PDOC) has been extended

to at least twice the length of the standard review period; thus, any suggestion that there has not been adequate time for review and analysis of the Project is completely unfounded.

If the Committee's orders related to schedule are to have any meaning at all, they must be adhered to by the parties and enforced by the Committee. The Committee should reaffirm the November 18, 2016 deadline for FSA publication, or implement the alternative approach suggested in Applicant's previous filing on this subject. In either case, the Committee should direct staff to schedule the FSA Workshop for the week of December 5.

DATED: November 14, 2016

Respectfully submitted,

*/s/ Michael J. Carroll*

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