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| TN #: | 215452 |
| Document Title: | Exhibit - Center for Biological Diversity Opening Testimony and Initial Exhibit List |
| Description: | N/A |
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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

Center for Biological Diversity's
Opening Testimony and Exhibit List

**CENTER FOR BIOLOGICAL DIVERSITY'S OPENING TESTIMONY
AND INITIAL EXHIBIT LIST**

EXHIBIT 7025

January 18, 2017

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INTRODUCTION

Intervenor Center for Biological Diversity (the “Center”) timely provides this Opening Testimony regarding the application for certification of the proposed Puente Power Project.

All of the testimony presented herein was prepared by the person testifying, a signed declaration and resume has also been provided for each person.

Center Attorneys Lisa T. Belenky and Kevin Bundy assisted in compiling this testimony and the documents submitted. All exhibit referenced in the opening testimony are filed concurrently with this testimony. An initial Exhibit List is provided below and a *complete* Exhibit List will be provided with the Center’s Pre-hearing Conference Statement.

The Center for Biological Diversity reserves the right to supplement and/or revise this testimony at any time up to and including the close of the evidentiary hearings. Moreover, many of the factual issues discussed in this Opening Testimony involve both legal and factual questions while others are predominately legal issues. Therefore, the Center respectfully reserves the right to address all disputed issues identified at the hearings through testimony, rebuttal, cross-examination, or at later stages of this process including in briefing following the evidentiary hearing.

Docket Number: 15-AFC-01

Date: January 18, 2017

Project Name: Puente Point Power Proposal

| Exhibit | Docket Transaction Number | Title of Document from Docket Log | Subject Areas |
|---------|---------------------------|---|---|
| 7000 | | Opening Testimony of Bill Powers, Declaration, and CV | Air Quality, Project Objectives, Alternatives |
| 7001 | | CPUC D.16-12-030, Order Modifying Decision (D.) 16-05-050 and Denying Rehearing, As Modified, December 1, 2016 | Air Quality, Project Objectives, Alternatives |
| 7002 | | CPUC D.13-02-015, February 13, 2013 | Air Quality, Project Objectives, Alternatives |
| 7003 | | California Energy Demand 2010-2020 Staff Revised Forecast, Form 1.5d, Statewide 1-in-10 Net Electricity Peak Demand by Agency and Balancing Authority, December 2009. | Air Quality, Project Objectives, Alternatives |
| 7004 | | California Energy Demand Update Forecast, 2016 - 2027, Mid Demand Baseline Case, Mid AAEE Savings, Form 1.5d – Statewide, 1 in 10 Net Electricity Peak Demand by Agency and Balancing Authority (MW), January 2017. | Air Quality, Project Objectives, Alternatives |
| 7005 | | CEC, Thermal Performance Gas-Fired, March | Air Quality, Project |

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| | | 2016 | Objectives, Alternatives |
| 7006 | | 2015 SCE Corp. Responsibility Report | Air Quality, Project Objectives, Alternatives |
| 7007 | | TN 215396, Applicant's Responses to Information Requested by VCAPCD re Application for Authority to Construct/ Determination of Compliance, May 15, 2015, Attachment 3 | Air Quality, Project Objectives, Alternatives |
| 7008 | | Gas Turbine World, <i>550 MW El Segundo combined cycle provides 300 MW in 10 minutes</i> , September-October 2013. | Air Quality, Project Objectives, Alternatives |
| 7009 | | CAISO homepage, January 17, 2017 | Air Quality, Project Objectives, Alternatives |
| 7010 | | CAISO, <i>Answer of the California Independent System Operator Corporation to (FERC) Compliant</i> , Docket No.EL16-88-000, July 7, 2016 | Air Quality, Project Objectives, Alternatives |
| 7011 | | CARB, Carl Moyer Program Guidelines, Chapter 1, Program Overview | Air Quality, Project Objectives, Alternatives |
| 7012 | | CARB, Carl Moyer Program Source Categories | Air Quality, Project Objectives, Alternatives |
| 7013 | | Sears Expert Report | Air Quality, Project Objectives, Alternatives |
| 7014 | | CPUC, <i>D.15-11-041: Decision Approving, In Part, Results of Southern California Edison Company Local Capacity Requirements Request for Offers for the Western LA Basin Pursuant to Decisions 13-02-015 AND 14-03-004</i> , November 19, 2015 | Air Quality, Project Objectives, Alternatives |
| 7015 | | CPUC, <i>D.16-05-050: Decision Approving, In Part, Results of Southern California Edison Company Local Capacity Requirements Request for Offers for Moorpark Sub-Area Pursuant to Decision 13-02-015</i> , May 26, 2016 | Air Quality, Project Objectives, Alternatives |
| 7016 | | Southern California Edison, CPUC Application A.14-11-012, <i>Testimony of Southern California Edison Company on the Results of Its 2013 Local Capacity Requirements Request For Offers (LCR RFO) for the Western Los Angeles Basin</i> , November 21, 2014 | Air Quality, Project Objectives, Alternatives |

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| 7017 | | CPUC, <i>Resolution E-4791 Authorizing expedited procurement of storage resources to ensure electric reliability in the Los Angeles Basin due to limited operations of Aliso Canyon Gas Storage Facility</i> , May 26, 2016. | Air Quality, Project Objectives, Alternatives |
| 7018 | | CPUC, <i>Resolution E-4804. Southern California Edison Company (SCE) requests approval of three resource adequacy only contracts with Western Grid Development, LLC, AltaGas Pomona Energy Storage Inc., and Grand Johanna LLC</i> , September 15, 2016. | Air Quality, Project Objectives, Alternatives |
| 7019 | | SDG&E press release, <i>California regulators approve SDG&E energy storage projects</i> , August 18, 2016. | Air Quality, Project Objectives, Alternatives |
| 7020 | | Utility Dive, <i>Inside construction of the world's largest lithium ion battery storage facility</i> , December 6, 2016. | Air Quality, Project Objectives, Alternatives |
| 7021 | | Utility Dive, <i>SCE taps Tesla for 80 MWh storage project to deal with Aliso Canyon gas shortage</i> , September 16, 2016. | Air Quality, Project Objectives, Alternatives |
| 7022 | | Testimony of Ileene Anderson Re: Impacts to Biological Resources from the Proposed Puente Power Project | Biological Resources, Alternatives |
| 7023 | | USFWS, <i>Recovery Plan for the Tidewater Goby (Eucyclogobius newberryi)</i> , 2005 | Biological Resources, Alternatives |
| 7024 | | Southern California Coastal Ocean Observing System; Salinity visited Jan. 17, 2017 http://www.sccoos.org/data/autoss/ | Biological Resources, Alternatives |
| 7025 | | Center for Biological Diversity Opening Testimony and Initial Exhibit List | Air Quality, Project Objectives, Biological Resources, Alternatives |

Dated: January 18, 2017

Respectfully submitted,

/s/ Lisa T. Belenky

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