

DOCKETED

Docket Number:	15-AFC-01
Project Title:	Puente Power Project
TN #:	220303
Document Title:	FFIERCE Prehearing Conference Statement July 21 2017
Description:	FFIERCE Prehearing Conference Statement July 21 2017
Filer:	Grace Chang
Organization:	FFIERCE
Submitter Role:	Intervenor
Submission Date:	7/21/2017 2:51:57 PM
Docketed Date:	7/21/2017

**STATE OF CALIFORNIA
CALIFORNIA ENERGY COMMISSION**

In the Matter of:

APPLICATION FOR CERTIFICATION
OF THE PUENTE POWER PROJECT

DOCKET NO. 15-AFC-01

PREHEARING CONFERENCE
STATEMENT OF FFIERCE

**PREHEARING CONFERENCE STATEMENT OF INTERVENOR FFIERCE
FIGHTING FOR INFORMED ENVIRONMENTALLY RESPONSIBLE CLEAN ENERGY**

July 21, 2017

Grace Chang
Fighting For Informed Environmentally
Responsible Clean Energy (FFIERCE)
Phone: 805-947-7218
changgenrg@gmail.com

FFIERCE's Prehearing Conference Statement

The following prehearing conference statement is timely submitted for the Committee hearings scheduled to be held on July 26, 27 and 28, 2017 in Oxnard, California.

1. The subject areas and issues in dispute that require adjudication, limited to those subjects described on page 2, above, and the precise nature of the dispute for each issue;

Of the subjects described on page 2 that will be the focus of the July 2017 hearings,¹ FFIERCE asserts that the subject areas and subtopics related to biological resources, coastal flooding, the effects of smaller turbine(s) on aviation at alternative sites, and the Proposed Project's eventual closure all remain in dispute.

For biological resources: the presence of various species and biological resources on site, in buffer areas, or on alternatives sites, the presence of ESHA, and the impacts to these resources all remain in dispute.

For coastal flooding: the modeling and other evidence showing the likelihood of flooding affecting the proposed project site and potential hazards from any such flooding remain in dispute.

For the use of smaller turbines at alternative sites: the effects on aviation remain in dispute.

For eventual closure of the proposed project if built, the impacts of demolition and removal of the proposed project at the time of its eventual closure in comparison to demolition and removal of the existing MGS 1 and during construction including whether this issue is properly framed to capture and address all potentially significant impacts.

2. The subject areas upon which the party proposes to introduce testimony in writing rather than through oral testimony;

FFIERCE has not submitted any new written testimony for the July 2017 hearings.

3. The identity of each witness the party intends to sponsor at the Evidentiary Hearing, the subject area(s) about which the witness(es) will offer testimony, whether the testimony will be oral or in writing, a brief summary of the testimony to be offered by the witness(es), qualifications of each witness, the time required to present testimony by each witness, and whether the witness seeks to testify telephonically;

FFIERCE is not sponsoring any witnesses for the July 2017 hearings.

¹ FFIERCE respectfully reserves the right to address any and all disputed issues at later stages of this process, including but not limited to, during briefing and in response to any PMPD.

4. Subject areas upon which the party desires to question the other parties' witness(es), a summary of the scope of the questions (including questions regarding witness qualifications), the issue(s) to which the questions pertain, and the time desired to question each witness. (Note: A party who fails to specify the scope, relevance and time for questioning other parties' witness(es) risks preclusion from questioning witnesses on that subject area.); and

Based on the supplemental written testimony these witnesses submitted, FFIERCE does not intend to question other parties' witnesses regarding these subjects. In the event that oral testimony addresses issues implicating environmental justice, socioeconomics or public health, FFIERCE may request an opportunity to pose questions.

5. A list identifying exhibits with transaction numbers (i.e., TN 215157) that the party intends to offer into evidence during the Evidentiary Hearing. Do not list exhibits previously identified in connection with the February 7-10, 2017 Evidentiary Hearings.

FFIERCE does not intend to offer new evidence at the July 2017 hearings.

Dated: July 21, 2017

Respectfully submitted,

Grace Chang
Fighting For Informed Environmentally
Responsible Clean Energy (FFIERCE)
4704 South Hall, UC Santa Barbara
Santa Barbara, California 93106-7110
Phone: 805-947-7218
changgenrg@gmail.com