

## DOCKETED

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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**

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DOCKET NO. 15-AFC-01

**CITY OF OXNARD'S PREHEARING  
CONFERENCE STATEMENT**

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The City of Oxnard files the following prehearing conference statement in response to the Commission's July 10, 2017 Order.

**1. Subject areas that require adjudication and precise nature of the dispute**

**Soil and Water Resources/Geology:** Whether the FSA, Supplemental Staff testimony, and testimony from NRG adequately address and mitigate risk due to sea level rise, flooding, and coastal hazards. The nature of the dispute includes:

Whether the CoSMoS 3.0 model accurately projects flooding hazard at the site, in particular, whether it reflects observed conditions at the site and in the vicinity of the project site and whether it accurately projects the influence of flooding from the Santa Clara River.

What assumptions are made by CoSMoS 3.0 with respect to long-term erosion of the dunes and the future location of the dune crest in front of the project site, total wave runup for the project site, and analysis of wave overtopping potential and how these assumptions affect the conclusion that the site is not at risk from flooding or sea level rise.

Whether CoSMoS 3.0 accurately accounts for variability in beach width in front of the project site and whether its assumption that only one storm would occur understates flood risk.

Whether staff's assessment of flood hazard based escalation of FEMA flood maps to account for sea level rise provides a realistic projection of flood risk at the project site.

Whether the applicant's assessment of flood risk at the project site accurately reflects observed conditions at the beach in front of the project site.

Whether the site is susceptible to flooding that would exceed the minimum amount of flooding that would result in Puente being unable to operate.

**The effect of a smaller turbine at an inland location:** Whether the supplemental staff testimony properly identified the technology and operation of the smaller inland peaker.

Whether the supplemental staff testimony accurately assessed aviation hazards from a smaller inland peaker, including whether it properly considered meteorological conditions that would diminish the plume and circumstances under which the inland peaker would be required to operate.

Whether mitigation proposed in the FSA for the Puente site could also be applied to an inland alternative.

**Proposed Project's Eventual Closure:** Whether the project approval includes conditions that require closure and demolition.

**2. The identity, qualifications, and subject matter of each witness Oxnard intends to call**

The qualifications of these witness were previously docketed as follows: David Revell (TN# 215427); Chris Campbell (TN# 220298); Jim Caldwell (TN#215439 )

**Soil and Water Resources**

- David Revell, Ph.D. will testify regarding the analysis of sea level rise and other coastal hazards. Mr. Revell will address the issues identified under Soil and Water Resources set forth in section 1.

Time estimate: 1 hour

- Chris Campbell, cbec, will testify regarding flood risk from the Santa Clara river and Pacific Ocean under current conditions and with sea level rise.

Time estimate: 1 hour

**Inland Alternative/Aviation Hazard**

- Jim Caldwell will testify regarding the inland peaker technology and operation. By telephone.

Time estimate: 15 minutes

**3. Subject areas/scope of questions to other parties' witnesses**

**Soil/Water Resources/Geology**

- CEC staff, Marylou Taylor, regarding the analysis conducted in the supplemental staff testimony, with respect to sea level rise, flood hazards, including the FEMA escalation and the basis for the decision to rely on the COSMOS model and assumptions regarding beach variability, dune erosion, and projections of flood risk under current and future scenarios.

Time estimate: 45 minutes

- NRG Consultant Philip Mineart regarding his qualifications and the analysis conducted by NRG with respect to project capacity to withstand flooding, sea level rise and coastal hazards, in particular the depth of his analysis, and assumptions regarding beach variability, dune erosion, and timeline of his analysis.

Time estimate: 30 minutes

- USGS witnesses, if present, regarding COSMOS model and assumptions regarding beach variability, dune erosion, resiliency planning, and projections of



# ATTACHMENT

Attachment A – City of Oxnard’s Second Exhibit List

<b>Exhibit Number</b>	<b>TN#</b>	<b>Document Title</b>	<b>Subject Area</b>
3060	216733	Declaration of Chris Williamson	Soil & Water Resources, Geology & Paleontology
3061	218873-1	Supplemental Testimony of Dr. Revell	Soil & Water Resources, Geology & Paleontology
3062	218882	Supplemental Testimony of Dr. Revell Exhibit Final Draft Guidelines for Coastal Flood Hazard Analysis and Mapping	Soil & Water Resources, Geology & Paleontology
3063	219169	Technical Memorandum Mandalay Generating Station Modeling Support	Soil & Water Resources, Geology & Paleontology
3064	219884	Technical Memorandum Mandalay Generating Station Modeling Support Download PDF’s & Figures	Soil & Water Resources, Geology & Paleontology
3065	220217	Supplemental Testimony of Dr. H. Andrew Gray	Alternatives/Aviation Hazards
3066	220218	Exhibit to Revell Closing Testimony - Video	Soil & Water Resources, Geology & Paleontology
3067	220220	Closing Supplemental Testimony of James H. Caldwell	Alternatives/Aviation Hazards
3068	220221	Closing Testimony of David Revell Phd on Proposed Puente Site	Soil & Water Resources, Geology & Paleontology
3069	220229	Testimony of Chris Williamson re Fifth and Del Norte Inland Site	Alternatives/Aviation Hazards
3070	220298	Chris Campbell Resume	Soil & Water Resources, Geology & Paleontology
3071	220300	Download from Our Coast Our Future Website	Soil & Water Resources, Geology & Paleontology

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