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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 JOINDER IN CEC STAFF'S
THE PUENTE POWER PROJECT) MOTION TO STRIKE CLOSING
) SUPPLEMENTAL TESTIMONY OF JAMES
) H. CALDWELL
)

Applicant hereby joins the "Motion to Strike Closing Supplemental Testimony of James H. Caldwell" filed by California Energy Commission Staff on July 21, 2017 (TN #220297) ("Motion to Strike").

The July 14, 2017 "Closing Supplemental Testimony of James H. Caldwell" filed by intervener City of Oxnard (TN #220220), which is the subject of the Motion to Strike, asserts essentially the same points raised in the "Supplemental Testimony of James H. Caldwell" filed on April 27, 2017 (TN #217321). The Committee ruled that the April 27, 2017 testimony was outside the scope of the upcoming evidentiary hearings in its June 9, 2017 "Committee Ruling on Motion to Exclude Caldwell Testimony and Acceptance of ISO Special Study Offer" (TN #218016). The scope of the upcoming evidentiary hearings remains limited to those matters identified in the March 10, 2017 "Committee Orders for Additional Evidence and Briefing Following Evidentiary Hearings" (TN #216505), as interpreted by the Committee in its June 9, 2017 ruling to exclude the April 27, 2017 Caldwell testimony, and the July 14, 2017 testimony should be excluded from the record for all of the reasons identified in the Motion to Strike.

DATED: July 21, 2017

Respectfully submitted,

/s/ Michael J. Carroll

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