

## DOCKETED

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### **Puente Power Project (P3)**

Please do NOT approve a new 262 MW peaker plant in Oxnard. This plant is not needed before 2020. The CAISO study confirms that preferred resources can meet those needs; however, the CAISO substantially overestimates the cost of preferred resources for the relevant time frame. There should be a high threshold of clearcut necessity before new gas generating capacity is approved so that a stranded asset is NOT charged to ratepayers.

â€¢ The Moorpark Sub-area is currently compliant with local capacity and reliability standards (Pg. 3 of the ISO study).

â€¢ Once-through-cooling power plants in Oxnard are slated to continue operation through 2020.

â€¢ Between now and 2020, costs of distributed renewable energy and storage will continue to fall, and can be RAPIDLY brought on line to meet DEMONSTRATED need; design of and costing of preferred resources should be based on 2019-2020 time frame.

â€¢ Thus additional preferred resources can be incented and obtained beyond the 135 MW of â€œincremental distributed resources that are assumed to be procured or properly enabled in the Moorpark subarea under all three scenariosâ€ in the ISOâ€™s study of alternatives to a new Puente fossil-fuel-powered energy station.