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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

**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 August 25, 2017 Order.

1. Subject areas that require adjudication and precise nature of the dispute based on the results of the California Independent System Operator's August 16, 2017 Report and Testimony Submitted In Response to that Report.

Alternatives: Whether the LCR need can be met through preferred resource alternatives or a combination of preferred resources and a smaller peaker.

Project Benefits, Objectives, and Need: Whether the Puente project is necessary or whether will provide any of the benefits set forth in the Applicant's and Staff's testimony.

Overrides: Whether the Commission can make the findings required by Public Resources Code section 25525.

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

Jim Caldwell, qualifications docketed as Jim Caldwell (TN#215439) on all of the issues identified above, including regarding the CAISO August 16 report, his testimony on that report, and the market, cost, pricing, and availability of preferred resources.

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

- Brian Theaker, regarding his testimony on the CAISO August 16 Report.
Time estimate: 45 minutes
- David Vidaver regarding CEC staff's opinions on CAISO's August 16 Report.
Time estimate: 30 minutes
- Matt Owens, Stem, regarding his testimony on the CAISO August 16 report and the market, cost, pricing, and availability of preferred resources.
Time estimate: 45 minutes
- Andrew Schwartz, Tesla, regarding his testimony on the CAISO report and the market, cost, pricing, and availability of preferred resources.
Time estimate: 45 minutes
- Alex Morris or other representative of CESA regarding its testimony on the CAISO August 16 report and the market, cost, pricing, and availability of preferred resources.

Time estimate: 30 minutes

- Mark Hesters, Staff Representative—if called by other parties.

Time estimate: 15 minutes

- Doug Karpa regarding the Clean Coalition’s testimony on the CAISO August 16 report and the market, cost, pricing, and availability of preferred resources.

Time estimate: 1 hour

- CAISO Representative regarding the CAISO Report.

Time estimate: 90 minutes

4. Exhibit list:

See Attachment A to this statement.

DATED: September 7, 2017

SHUTE, MIHALY & WEINBERGER LLP

By: /s/ Ellison Folk

ELLISON FOLK

EDWARD T. SCHEXNAYDER

Attorneys for the CITY OF OXNARD

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Attachment A – City of Oxnard’s Third Exhibit List

Exhibit Number	TN#	Document Title	Subject Area
3074	215438-2	Application of Southern California Edison Company for Approval of the Results of its Second Preferred Resources Pilot Request for Offers, November 4, 2016	Alternatives/Overrides/Project Benefit, Objectives, Need
3075	217325	Board Approved 2016-2017 Transmission Plan, March 17, 2017	Alternatives/Overrides/Project Benefit, Objectives, Need
3076	217326	A.17-03-XXX, March 30, 2017. Testimony in Support of Application of Southern California Edison Company for Recovery of Aliso Canyon Utility Owned Energy Storage Costs	Alternatives/Overrides/Project Benefit, Objectives, Need
3077	217327	Using Renewables To Operate a Low-Carbon Grid, CAISO, First Solar, NREL, Jan 11, 2017	Alternatives/Overrides/Project Benefit, Objectives, Need
3078	217328	Guidance on interpreting the forecast and production cost model for energy efficiency, Resource Consultants, LLC, August 7, 2015	Alternatives/Overrides/Project Benefit, Objectives, Need
3079	217329	Demand Response Potential for California SubLAPS and Local Capacity Planning Areas an Addendum to the 2025 California Demand Response Potential Study, April 1, 2017	Alternatives/Overrides/Project Benefit, Objectives, Need
3080	217330	CPUC, A.14-11-016, Exhibit No. ORA 7 Data Request Responses from Southern California Edison Company, Nov 1, 2016	Alternatives/Overrides/Project Benefit, Objectives, Need
3081	217331	Goleta Area Request for Offers	Alternatives/Overrides/Project Benefit, Objectives, Need
3082	217333	SCE Advice Letter 3454-E, August 15, 2016	Alternatives/Overrides/Project Benefit, Objectives, Need
3083	220958	Preliminary RESOLVE Modeling Results for Integrated Resource Planning at the CPUC, CPUC Energy Division, July 19, 2017	Alternatives/Overrides/Project Benefit, Objectives, Need
3084	220960	SACCWIS Encina Power Station 2018 Reliability Study Report, Prepared by the Inter-Agency	Alternatives/Overrides/Project Benefit, Objectives, Need

Exhibit Number	TN#	Document Title	Subject Area
		Working Group, SACCWIS Meeting, February 23, 2017	
3085	220962	Appendix A Proposed Amendment to the Water Quality Control Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling, 8/15/17 BD Meeting – Item ##, Change Sheet #1 (Circulated 8/14/17)	Alternatives/Overrides/Project Benefit, Objectives, Need
3086	220963	KIUC and AES Distributed Energy Announce Plan to Construct Innovative Renewable Peaker Plant on Kaua‘i Utilizing a Hybrid Solar and Battery Storage System, Kauai Island Utility Cooperative, 01/10/2017	Alternatives/Overrides/Project Benefit, Objectives, Need
3087	220964	Statewide Advisory Committee on Cooling Water Intake Structures (SACCWRS) 2017 Report	Alternatives/Overrides/Project Benefit, Objectives, Need
3088	220965	Lazard Levelized Cost of Storage Version 2.0, December 2016	Alternatives/Overrides/Project Benefit, Objectives, Need
3089	220966	California 2030 Low Carbon Grid Study (LCGS) Guidance on interpreting the forecast and production cost model for energy efficiency, Tierra Resource Consultants, LLC, August 7, 2015	Alternatives/Overrides/Project Benefit, Objectives, Need
3090	220974	Testimony of James H. Caldwell Regarding The California Independent System Operator August 16, 2017, Moorpark Sub-Area Local Capacity Alternative Study	Alternatives/Overrides/Project Benefit, Objectives, Need

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