

## DOCKETED

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<b>Project Title:</b>	Puente Power Project
<b>TN #:</b>	221083
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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 PREHEARING  
THE PUENTE POWER PROJECT ) CONFERENCE STATEMENT  
) (SEPTEMBER 14-15, 2017 EVIDENTIARY  
) HEARINGS)  
)  
\_\_\_\_\_ )

Pursuant to the August 25, 2017 “Notice of Evidentiary Hearing and Committee Conferences, Order for Prehearing Filing of Evidentiary Objections and Motions, etc” (TN #220900) (the “August 25 Order”) issued by the Committee in connection with its review of the Puente Power Project (the “Project”), Applicant hereby submits its Prehearing Conference Statement. The August 25 Order require the parties’ Prehearing Conference Statements to include the information specified in the numbered headings 1-4 below.

**1. The issues in dispute that require adjudication and the precise nature of the dispute for each issue. Issues are limited to those related to the California ISO Study.**

Applicant disputes any and all assertions made, or that may be made, that the preferred resources portfolios analyzed in the August 16, 2017 Moorpark Sub-Area Local Capacity Alternatives Study prepared by the California Independent System Operator (“CAISO”) (the “Moorpark Alternatives Study”), or any other preferred resources alternatives identified in testimony filed by the Parties in response to the Moorpark Alternatives Study or elsewhere, would maintain electrical reliability in the Moorpark Sub-Area in a manner that is superior to the Project. Applicant also disputes any and all assertions that any such preferred resources alternative could be feasibly or timely deployed to meet the specific local capacity needs of the Moorpark Sub-Area. Finally, Applicant disputes any and all assertions that the Project is not superior to any such preferred resources alternative across a wide range of evaluation criteria, including feasibility, reliability, and cost-effectiveness, for ensuring electrical grid reliability in the Moorpark Sub-Area.

2. **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.**

Table A below identifies the witnesses Applicant intends to sponsor at the Evidentiary Hearing, the subject area and format of their testimony, a brief summary of their testimony, and the estimated time for oral testimony. Mr. Theaker’s qualifications were previously filed in these proceedings (see, Joint Expert Declaration of Brian Theaker and Sean Beatty in Response to Opening Testimony of CBD Witness Bill Powers and Opening Testimony of City of Oxnard Witness Jim Caldwell, TN #215553; Exhibit No. 1121). Ms. Gleiter’s qualifications are attached hereto as Attachment A. Applicant’s witnesses will appear at the Evidentiary Hearing, and Applicant will not offer any witnesses to testify telephonically.

**Table A**  
**Applicant Sponsored Witnesses for Evidentiary Hearing**

<b>Witness</b>	<b>Subject Area</b>	<b>Format</b>	<b>Summary</b>	<b>Time Required for Oral Testimony</b>
Brian Theaker	All subject areas to be addressed during the Evidentiary Hearing, including but not limited to Alternatives and Reliability	Written (see Table B below) and Oral	Mr. Theaker will provide supplemental oral testimony consistent with his previously filed written testimony, and will respond to any contrary assertions contained in the previously filed written testimony of the Parties or offered as oral testimony at the Evidentiary Hearing	20 minutes for opening statement  30 minutes reserved for questions
Dawn Gleiter	All subject areas to be addressed during the Evidentiary Hearing, including but not limited to Alternatives and Reliability	Oral	Ms. Gleiter will provide oral testimony regarding the viability of preferred resources alternative to meet local reliability needs	10 minutes for opening statement  20 minutes reserved for questions

3. **Subject areas upon which the party desires to question the other parties' and the California ISO's 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.)**

Table B below identifies the witnesses Applicant intends to question, a summary of the scope of the questions and the issues to which the questions will pertain, and the estimated time for questioning.

**Table B**  
**Applicant's Intended Questioning of Other Parties' Witnesses**

Witness	Scope and Issues to be Covered	Time Required for Questioning
Damon Franz <sup>1</sup>	Viability of preferred resources as an alternative to the Project to meet local reliability needs.	30 minutes
Matt Owens	Viability of preferred resources as an alternative to the Project to meet local reliability needs.	30 minutes
James Caldwell	Viability of preferred resources as an alternative to the Project to meet local reliability needs.	30 minutes
Doug Karpa	Viability of preferred resources as an alternative to the Project to meet local reliability needs.	30 minutes

4. **A list identifying exhibits with transaction numbers (i.e., TN 215157) that the party intends to offer into evidence during the Evidentiary Hearing.**

Table C below identifies the additional Exhibit Applicant intends to offer into evidence during the Evidentiary Hearing.

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<sup>1</sup> In an e-mail communication with the Hearing Officer dated September 6, 2017 (TN #221055), counsel for Sierra Club, EDC and Environmental Coalition of Ventura County indicated that he would perhaps substitute Mr. Andy Schwartz as a witness in place of Mr. Franz. Without waiving any objections that it may have, in the event that Mr. Schwartz does offer testimony, Applicant reserves 30 minutes for questioning.

**Table C**  
**Applicant's Intended Additional Exhibits**

<b>Proposed Exhibit No.</b>	<b>Transaction No.</b>	<b>Title of Document</b>	<b>Subject Area(s)</b>
1151	220971	Expert Declaration of Brian Theaker in Response to CAISO Moorpark Sub-Area Local Capacity Alternative Study	Alternatives Reliability

DATED: September 7, 2017

Respectfully submitted,

*/s/ Michael J. Carroll*

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Michael J. Carroll  
LATHAM & WATKINS LLP

# **ATTACHMENT A**

# Dawn M. Gleiter

100 California Street  
San Francisco, CA 94111  
Dawn.Gleiter@nrgenergy.com

## EMPLOYMENT:

- 2014- Present      **Director of Sustainable Development**, NRG Energy Inc., San Francisco CA
- *Deliver enhanced business value by embedding sustainable practices in energy developments that are needed to today to transition us to the clean energy future.*
- 2013- 2014      **Sustainability Specialist**, NRG Energy Inc., San Francisco CA
- *Create and deliver sustainability solutions – from opportunity to strategy to execution – in which the connection between corporate and sustainability strategy is essential and the creation of value*
- 2012-2013      **Asset Manager**, NRG Energy Inc., Pittsburg, CA
- *Optimize a portfolio of 3 power generating assets to achieve better than projected value generating over \$.5M in additional revenue annually.*
  - *Successfully pitched and presented an innovative project idea at company senior leadership meeting. Project has received seed funding and is moving forward with development.*
- 2010-2012      **Business Development Project Manager/ Analyst**, GenOn Energy Inc, Pittsburg CA
- *Negotiated major project lateral agreements with local communities, & agencies with efficient cross functional coordination saving over \$1.6M in project costs.*
  - *Managed project development P&L and development schedule for \$500M+ project to achieve an on time and under budget completion.*
  - *Directed a team of engineers, lawyers, and real-estate lenders through a parcel subdivision to facilitate a \$600 million development opportunity.*
- 2008 – 2010      **Pricing Analyst**, MOL (America) Inc., Concord CA
- *Quantitatively recognized as the top department analyst 2 years consecutively*
  - *Developed strong collaborative relationships with international sales force, leading to an estimated \$1.8 million revenue increase.*
  - *Designed and programmed innovative excel workbook template which greatly increased department efficiency.*
- 2006 – 2008      **General Manager**, Yellow Wood Coffee and Tea, Alamo CA
- *Created financial reporting systems and through analysis reduced operational cost by \$40,000 annually.*
  - *Developed hiring, training, inventory and management systems which increased employee efficiency by 42.4%.*
- 2005- 2006      **Center Director**, The Washington Post, SCORE! Educational Centers, Alamo CA
- *Exceeded territory and company growth averages for 10 months; while evaluating business model and compiling recommendations for the Washington Post Company.*

## ADDITIONAL SKILLS:

*Software:* Microsoft (Word, Excel, Publisher, Outlook, and Accesses), Adobe (Page Maker, Illustrator, Photoshop, Indesign) Lotus Notes, QuickBooks, Microsoft Money and data analysis software SAS and TSP

## EDUCATION:

- Master of Business Administration**, - University of San Francisco  
\* Finance Focus- Dean's List
- Bachelor of Arts in Economics**-New Mexico State University  
\* Summa Cum Laude / Deans List (3.9 GPA)