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Project Title:	Puente Power Project
TN #:	221090
Document Title:	Sierra Club, EDC, Env'tl Coalition of Ventura Prehearing Conference Statement
Description:	Intervenor's Sierra Club, Los Padres Chapter, Environmental Coalition of Ventura County and Environmental Defense Center Prehearing Conference Statement
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Organization:	Sierra Club
Submitter Role:	Intervenor
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STATE OF CALIFORNIA
State Energy Resources
Conservation and Development Commission

In the Matter of:)
)
APPLICATION FOR CERTIFICATION)
OF THE PUENTE POWER PROJECT)
)

Docket No. 15-AFC-01

INTERVENORS' SIERRA CLUB
LOS PADRES CHAPTER,
ENVIRONMENTAL COALITION
OF VENTURA COUNTY AND
ENVIRONMENTAL DEFENSE
CENTER PREHEARING
CONFERENCE STATEMENT

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Sierra Club (“SC”), Environmental Coalition of Ventura County (“EC”) and Environmental Defense Center (“EDC”) file 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 for each issue.

Alternatives: Whether the LCR need can be met through preferred resource alternatives, a combination of preferred resources and resources that provide voltage support, or preferred resources and a smaller peaker and the cost and feasibility of those alternatives.

2. The identity, qualifications, and subject matter of each witness SC, ED and EDC intends to call, whether testimony will be oral or in writing, time required to present testimony and whether witness seeks to testify telephonically:

Matt Owens, Stem, qualifications docketed at TN#220975. Mr. Owens has submitted written testimony (TN#220975) and will supplement this testimony orally. Sierra Club estimates 30 minutes for Mr. Owens’ testimony, including questioning. The subject matter will include the CAISO Study’s assumptions on resource cost, use of preferred resources to meet local reliability need, and preferred resource potential in the Moorpark area. Mr. Owens plans to testify in person.

Andrew Schwartz, Tesla, qualifications docketed at TN#221056. Mr. Schwartz will submit oral testimony. Sierra Club estimates 30 minutes for Mr. Schwartz’s testimony, including questioning. The subject matter will include the CAISO Study’s assumptions on resource cost, use of preferred resources to meet local reliability need and preferred resource potential in the Moorpark area. Mr. Schwartz plans to testify in person. Mr. Schwartz has not submitted written testimony but is prepared to adopt and answer questions on the written testimony submitted by his colleague (TN#220976), Damon Franz, who is unable to attend hearings either in person or telephonically.

3. Subject areas/scope of questions/time desired to cross other parties’ witnesses

- CAISO Representatives regarding the CAISO Moorpark Sub-Area Local Capacity Alternatives Study (“CAISO Report”).
Time estimate: 75 minutes
- Brian Theaker, regarding his testimony on the CAISO Report.
Time estimate: 20 minutes
- Jim Caldwell, regarding his testimony on the CAISO Report.
Time estimate: 10 minutes
- Doug Karpa, regarding his testimony on the CAISO Report.
Time estimate: 10 minutes
- Relevant CEC staff if oral testimony provided regarding staff opinions on CAISO Report.

Time estimate: 15 minutes

4. Exhibit list

Exhibit Number	TN#	Document Title	Subject Area
4045	220976	Damon Franz Testimony re CAISO Study	Alternatives, CAISO Study
4046	220975	Matt Owens Testimony re CAISO Study	Alternatives, CAISO Study
4047	221056	Resume of Andy Schwartz	
4048	221075	CAISO, Moorpark Subarea Local Capacity Alternative Study, Preferred Resource Scenarios Stakeholder Call, June 30, 2017	Alternatives, CAISO Study
4049	221076	CEC Consultant Report, San Joaquin Valley Distributed Energy Resource (July 2016)	Alternatives, CAISO Study
4050	221077	CEC, 2016-2027, Mid Demand Baseline Low AAEE 1-in-10 Forecast	Alternatives, CAISO Study
4051	221078	CEC, California Energy Demand 2016-2026, Revised Electricity Forecast (Jan. 2016)	Alternatives, CAISO Study
4052	221079	CEC, 2016-2027, Mid-Demand Baseline Low AAEE 1-in-2 Forecast	Alternatives, CAISO Study
4053	221080	CAISO, Consideration of Alternatives to Transmission or Conventional Generation to Address Local Needs in the Transmission Planning Process, Sept. 4, 2013	Alternatives, CAISO Study
4054	221086	Letter providing link to article in Greentech Media dated August 31, 2017 titled, <i>In Storage vs. Peaker Study, CAISO's Outdated Cost Estimates Produce Higher Price Tag for Storage</i> , https://www.greentechmedia.com/articles/read/energy-storage-nrg-puente-gas-peaker-plant-cost	Alternatives, CAISO Study

4055	221089	CPUC, A.16-11-016, Application of SCE for Approval of Results of Moorpark RFO, Evidentiary Hearing Transcript, Vol 5, Nov. 1, 2016 (Sekhon Cross Only Containing Only Public Testimony)	Alternatives, CAISO Study
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DATED: September 7, 2017

Respectfully Submitted,

By: /s/ Matthew Vespa

MATTHEW VESPA

ALISON SEEL

ALICIA ROESSLER

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