

## DOCKETED

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<b>Project Title:</b>	Puente Power Project
<b>TN #:</b>	221107
<b>Document Title:</b>	Applicant's Motion to Strike Supplemental Testimony of Dr. Doug Karpa re CAISO Study
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9 State of California  
10 Energy Resources  
11 Conservation and Development Commission

12 In the Matter of:  
13 Application for Certification  
14 for the PUENTE POWER PROJECT

Docket No. 15-AFC-01

APPLICANT'S MOTION TO STRIKE  
SUPPLEMENTAL TESTIMONY OF  
DR. DOUG KARPA RE CAISO STUDY

15 Pursuant to Title 20, California Code of Regulations ("CCR") § 1211.5(a) and  
16 § 1212(b)(2), Applicant hereby requests that the Committee exercise its authority under Title 20,  
17 CCR § 1203(c) to strike the "Supplemental Testimony of Dr. Doug Karpa re CAISO Study"  
18 (TN #220959) ("Karpa Testimony") on the basis that it is outside the scope of the upcoming  
19 evidentiary hearings.

20 On June 20, 2017, the Committee issued "Committee Orders Extending ISO Study Time,  
21 Denying City Request for Additional Time and Revised Committee Schedule" (TN #219815)  
22 (the "June 20 Orders"). In the June 20 Orders, the Committee accepted an offer made by the  
23 California Independent System Operator ("CAISO") to conduct a special study of the Moorpark  
24 Sub-Area (the "CAISO Special Study"). June 20 Orders at 3.

25 The design of the CAISO special Study, including the preferred resources portfolios to be  
26 analyzed, was determined by the CAISO with input from Southern California Edison and the  
27 public. The CAISO hosted a public webinar for the specific purposes of soliciting input on the  
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1 preferred resources portfolios to be analyzed. (TN #219141). This allowed the Parties and the  
2 public an opportunity to participate in the design of the study parameters.

3 The parties were invited to submit additional evidence “in response to California ISO  
4 Study.” August 25 Orders at 3. The Committee did not extend an invitation to the Parties to  
5 develop and present their own proposed alternatives to the Puente Power Project, as the Karpa  
6 Testimony attempts to do.

7 Therefore, additional proposed alternatives to the Project, beyond those analyzed in the  
8 CAISO Special Study, are beyond the scope of the upcoming evidentiary hearings, and any  
9 discussion of such additional alternatives in the filed testimony must be stricken. Furthermore,  
10 no oral testimony on such alternatives can be taken during the evidentiary hearings.

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DATED: September 8, 2017

Respectfully submitted,

*/s/ Michael J. Carroll*

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