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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 OPPOSITION
TO MOTION TO STRIKE
TESTIMONY OF JAMES CALDWELL**

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NRG's motion to strike Jim Caldwell's testimony regarding a preferred resource alternative is meritless. The Committee's order requesting the CAISO Study specifically directed the parties to file testimony "responding to" it by August 30, 2017.¹ Mr. Caldwell's discussion of an alternative scenario 4 is clearly in response to the CAISO study.

As set forth in Mr. Caldwell's testimony, the CAISO study demonstrates that it is feasible from a technical standpoint to satisfy the Local Capacity Requirement without the Puente project. In particular, the CAISO study demonstrates the amount of reactive voltage support (as opposed to real power generation) required to meet the LCR need. As set forth in the Study, providing this reactive voltage support dramatically reduces the amount of real power that needs to be generated in the event of the N-1-1 contingency that drives the LCR need.²

The CAISO study's Scenario 2 proposes to provide reactive voltage support with a stand-alone synchronous condenser and proposed to meet the remaining power need with 9 hour batteries. Mr. Caldwell's Scenario 4 is a response to Scenario 2 and shows that—after providing for reactive voltage support—it is possible to provide the remaining power need with a combination of energy efficiency, demand response, solar, and a much smaller set of batteries. An alternative that responds to the findings of the CAISO report,

¹ TN 219815 at p. 3 (June 20, 2017 Committee Order); TN 218016 at p. 5 (June 9, 2017 Order requesting "party responses" to the CAISO Study.)

² CAISO Study at p. 15; Caldwell Testimony at pp. 9-10.

but identifies a much less costly way of meeting the LCR need is clearly within the scope of permissible testimony.

In fact, the testimony offered by Mr. Caldwell, as well as the other intervenors, goes directly to the findings the CEC must make to approve the project both under CEQA and Public Resources Code section 25525. Because the testimony relates to the LORs and CEQA overrides, exclusion of any testimony regarding an alternative based on the CAISO study would be prejudicial and would interfere with the CEC's ability to support its determination.

The motion to strike should be denied.

DATED: September 11, 2017

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By: /s/ Ellison Folk

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