

DOCKETED

Docket Number:	15-AFC-01
Project Title:	Puente Power Project
TN #:	223250
Document Title:	Applicant's Status Report
Description:	N/A
Filer:	Paul Kihm
Organization:	Latham & Watkins LLP
Submitter Role:	Applicant Representative
Submission Date:	4/20/2018 12:51:41 PM
Docketed Date:	4/20/2018

Michael J. Carroll
michael.carroll@lw.com
Marc T. Campopiano
marc.campopiano@lw.com
LATHAM & WATKINS LLP
650 Town Center Drive, Suite 2000
Costa Mesa, CA 92626
(714) 540-1235

STATE OF CALIFORNIA
ENERGY RESOURCES
CONSERVATION AND DEVELOPMENT COMMISSION

In the Matter of:)	Docket No. 15-AFC-01
)	
APPLICATION FOR CERTIFICATION FOR)	APPLICANT’S STATUS REPORT
THE PUENTE POWER PROJECT)	
)	
)	
)	

Applicant hereby submits its Status Report for the Puente Power Project (“P3”) per the Committee’s Order Granting Applicant’s Motion To Suspend And Denying Intervenors’ Application To File Supplemental Response dated November 3, 2017 (“Suspension Order”). The Suspension Order required the filing of a Status Report no later than April 20, 2018.

The Suspension Order granted a suspension of the P3 application through May 1, 2018. Applicant made its suspension request to evaluate the results of an expedited preferred resources procurement process initiated by Southern California Edison (Request for Offers, RFO) and “evaluate whether or not to proceed to a final decision on the Project.”

At the time the request for suspension was made, Applicant could not predict the schedule for the expedited RFO that Southern California Edison (SCE) would undertake. Since that time, SCE has published a schedule that anticipates results of its expedited RFO to be announced on March 26, 2019, the date on which SCE has targeted for filing an application with the California Public Utilities Commission. See Moorpark LCR/Goleta Resiliency Request for Proposals Web Site, RFP Schedule Tab, https://scemoorparkgoletarfp.accionpower.com/scemg_1701/calendar.asp.

Based on the timing of SCE’s RFO, Applicant submits that a further extension of the suspension period would be prudent. Until SCE has successfully procured preferred resources that can replace P3, the possibility still exists that P3 would be needed to fill a local reliability

need. Given the resources expended to date to create a record, extending the suspension would be an efficient insurance policy in the event SCE's RFO is unsuccessful and emergency options for addressing reliability become necessary.

Applicant suspects that intervenors will point to a recent decision by the California Independent System Operator ("CAISO") approving transmission upgrades as a basis to terminate this proceeding. Applicant disagrees. While it is true that, if constructed, those transmission upgrades will reduce the local capacity requirement that originally gave rise to the need for P3, a CAISO approval in its Transmission Planning Process is at a very early stage of transmission development. Extending the suspension to account for the SCE RFO process will also allow time to assess the actual viability of future transmission upgrades recently approved by the CAISO.

For these reasons, Applicant requests an extension of the suspension period to coincide with the California Public Utilities Commission's final decision on SCE's application seeking approval of resources procured through its Moorpark RFO, or until June 30, 2019, whichever is sooner.

DATED: April 20, 2018

Respectfully submitted,

/s/ Michael J. Carroll

Michael J. Carroll
LATHAM & WATKINS LLP
Counsel to Applicant