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On NRG's Request to Extend Suspension of Proceeding

Joint response is by City of Oxnard, the Sierra Club Los Padres Chapter, the Environmental Defense Center, the Environmental Coalition of Ventura County, and Center for Biological Diversity

Additional submitted attachment is included below.

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

**JOINT RESPONSE OF THE CITY OF
OXNARD, THE SIERRA CLUB LOS PADRES
CHAPTER, THE ENVIRONMENTAL
DEFENSE CENTER, THE ENVIRONMENTAL
COALITION OF VENTURA COUNTY,
FIGHTING FOR INFORMED
ENVIRONMENTALLY
RESPONSIBLE CLEAN ENERGY, AND THE
CENTER FOR BIOLOGICAL DIVERSITY TO
NRG's REQUEST TO EXTEND SUSPENSION
OF PROCEEDING**

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Pursuant to the Committee's April 30, 2018 Order, intervenors the City of Oxnard, the Sierra Club Los Padres Chapter, the Environmental Defense Center, the Environmental Coalition of Ventura County, Fighting for Informed Environmentally Responsible Clean Energy, and the Center for Biological Diversity file this supplemental response¹ to NRG's request to extend this proceeding to June 2019.

The Committee should deny both NRG's extension request and the AFC, which was predicated on satisfying Southern California Edison's 2013 procurement target for Moorpark local capacity requirements.² That procurement target is now moot, and the record in this proceeding shows that NRG cannot meet other key objectives for its project.³

NRG offers no compelling reason for extending this proceeding for another year. Puente is hardly a "cost-free insurance policy."⁴ It is excessively expensive, unnecessary to satisfy local capacity requirements, unable to meet Goleta-area resiliency targets, and environmentally damaging. As a result, the project is contrary to the public convenience and necessity and should be rejected.

DATED: May 11, 2018

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¹ Although Intervenors have not refiled the arguments from their April 20, 2018 Joint Status Report (TN 223255) as part of this Response, those arguments provide more-than-adequate grounds for the Committee to reject NRG's extension request and deny the AFC.

² TN 204219-4 (AFC Executive Summary, Project Objectives) at p. 1-2.

³ For instance, Puente cannot "Be designed, permitted, built, and commissioned by June 1, 2020," nor can it "produce electricity without creating significant environmental impacts." *Id.* at p. 1-3.

⁴ TN 223322 (Applicant's Response to Committee Order).

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