

## DOCKETED

<b>Docket Number:</b>	15-AFC-02
<b>Project Title:</b>	Mission Rock Energy Center
<b>TN #:</b>	222999
<b>Document Title:</b>	Mission Rock Energy Center, LLC Response to Committee Request for Comments on Applicant's Notice to Suspend Proceedings
<b>Description:</b>	N/A
<b>Filer:</b>	Eric Janssen
<b>Organization:</b>	Ellison Schneider Harris & Donlan LLP
<b>Submitter Role:</b>	Applicant Representative
<b>Submission Date:</b>	3/19/2018 4:25:17 PM
<b>Docketed Date:</b>	3/19/2018

**STATE OF CALIFORNIA**

**ENERGY RESOURCES CONSERVATION AND DEVELOPMENT COMMISSION**

In the Matter of: )  
 )  
Application for Certification for the )  
Mission Rock Energy Center )

Docket No. 15-AFC-02

**MISSION ROCK ENERGY CENTER, LLC  
RESPONSE TO COMMITTEE REQUEST FOR COMMENTS ON APPLICANT'S  
NOTICE TO SUSPEND PROCEEDINGS**

Jeffery D. Harris  
Samantha G. Neumyer  
ELLISON SCHNEIDER  
HARRIS & DONLAN LLP  
2600 Capitol Avenue, Suite 400  
Sacramento, CA 95816  
Telephone: (916) 447-2166  
Facsimile: (916) 447-3512  
Email: [jd@eslawfirm.com](mailto:jd@eslawfirm.com)

March 19, 2018

Attorneys for Mission Rock Energy Center,  
LLC

STATE OF CALIFORNIA

ENERGY RESOURCES CONSERVATION AND DEVELOPMENT COMMISSION

In the Matter of: )  
 )  
Application for Certification for the )  
Mission Rock Energy Center )

Docket No. 15-AFC-02

MISSION ROCK ENERGY CENTER, LLC  
RESPONSE TO COMMITTEE REQUEST FOR COMMENTS ON APPLICANT’S  
NOTICE TO SUSPEND PROCEEDINGS

Mission Rock Energy Center, LLC (the “Applicant”) submits these comments in response to the Committee’s March 15, 2018 memorandum requesting that the Applicant specify the length of requested suspension of the Application for Certification for the Mission Rock Energy Center (“MREC AFC”).<sup>1</sup>

As described in the Applicant’s *Notice of Suspension*, California policies and programs relating to grid reliability—particularly local reliability and procurement— have been in transition.<sup>2</sup> The solutions to resolving local reliability issues in the Moorpark Subarea and overall system reliability are still being determined. In light of this uncertainty, the MREC AFC proceeding should be suspended until the following three conditions are satisfied, unless the Applicant notifies the Commission of its intent to resume processing the AFC at an earlier time:

- (1) The projects approved by the California Public Utilities Commission (“CPUC”) resulting from Southern California Edison’s (“SCE’s”) *Moorpark Sub-Area Local Capacity Requirements Procurement Plan Of Southern California Edison Company Submitted To Energy Division Pursuant To D. 13-02-015* (Dated December 21, 2017, CPUC Rulemaking 12-03-014 or a successor CPUC docket) are final, non-appealable, constructed, and operating;
- (2) The SCE Pardee-Moorpark No. 4 230-kV Transmission Circuit submitted into the California Independent System Operator (“CAISO”) 2017-2018 ISO Transmission Planning Process to mitigate the Moorpark subarea local capacity deficiency is approved, final, non-appealable, constructed, and operating; and

<sup>1</sup> See, TN#: 222975.

<sup>2</sup> TN#: 222943.

- (3) There are no new solicitations, requests for offers, requests for proposals, or similar initiatives, commenced after March of 2018, intended to address reliability in the Big Creek/Ventura Local Reliability Area pending before any local or state governmental entities.

Dated: March 19, 2018

Respectfully submitted,

ELLISON SCHNEIDER HARRIS & DONLAN LLP



By \_\_\_\_\_

Jeffery D. Harris  
Samantha G. Neumyer  
2600 Capitol Avenue, Suite 400  
Sacramento, California 95816  
Telephone: (916) 447-2166  
Facsimile: (916) 447-3512  
Email: [jdh@eslawfirm.com](mailto:jdh@eslawfirm.com)

Attorneys for Mission Rock Energy Center, LLC