

DOCKETED

Docket Number:	07-AFC-06C
Project Title:	Carlsbad Energy Center - Compliance
TN #:	203872
Document Title:	Robert Simpson Pre-Hearing Conference Statement
Description:	N/A
Filer:	David Zizmor
Organization:	Robert Simpson
Submitter Role:	Intervenor
Submission Date:	3/13/2015 2:29:05 PM
Docketed Date:	3/13/2015

STATE OF CALIFORNIA
ENERGY RESOURCES CONSERVATION
AND DEVELOPMENT COMMISSION

In the Matter of:)	
Petition to Remove Obsolete Facilities)	Docket No. 07-AFC-06C
To Support Construction of the)	
Carlsbad Energy Center)	
)	
And Petition to Amend the Carlsbad)	
Energy Center Project)	
_____)	

ROBERT SIMPSON’S PREHEARING CONFERENCE STATEMENT

This statement is submitted with the understanding that Mr. Simpson reserves the right to amend it following the release of the San Diego Air Pollution Control District’s Final Determination of Compliance in the coming weeks.

Required Information:

1. Issues of Disagreement
 - a. Air Quality – Greenhouse Gas Emissions and Federal NSPS Standards
2. Witnesses of Robert Simpson
 - a. At this time, Mr. Simpson does not intend to introduce any witnesses.
3. Telephone Witnesses
 - a. See 2a
4. Witnesses Mr. Simpson intends to question and subject matter
 - a. William Walters of the CEC staff on issues surrounding greenhouse gas emissions and federal NSPS standards.
 - b. Gary Rubenstein, expert for the Project Owner, on issues surrounding greenhouse gas emissions and federal NSPS standards.
5. Mr. Simpson recommends the hearings be conducted in an informal process.
6. Mr. Simpson suggests that legal argument or briefing for certain issues take place after the hearings.
7. Mr. Simpson suggests that oral arguments be given at the close of the hearings.

8. Mr. Simpson requests 15 minutes of time to question Mr. Walters and 10 minutes to question Mr. Rubenstein. Mr. Simpson also requests 5 minutes of time for a closing oral argument.
9. Mr. Simpson requests that the Committee take official notice of the following documents:
 - a. From the California Public Utilities Commission A.14-07-009, the Proposed Decision of ALJ Yacknin: Decision Denying Without Prejudice San Diego Gas & Electric Company's Application For Authority to Enter Into Purchase Power Tolling Agreement With Carlsbad Energy Center, LLC, dated March 6, 2015.
 - b. Proposed Federal NSPS Standards for Carbon Emissions, available in the Federal Register here: <https://www.federalregister.gov/articles/2014/06/18/2014-13726/carbon-pollution-emission-guidelines-for-existing-stationary-sources-electric-utility-generating>.

Respectfully Submitted,

/s/ Robert Simpson

March 13, 2015