

**DOCKETED**

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<b>Project Title:</b>	Stanton Energy Reliability Center
<b>TN #:</b>	224177
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<b>Organization:</b>	DayZenLLC
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STATE OF CALIFORNIA

Energy Resources  
Conservation and Development Commission

In the Matter of:

Application For Certification for the  
**STANTON ENERGY RELIABILITY  
CENTER**

**DOCKET NO: 16-AFC-01**

**STANTON ENERGY RELIABILITY  
CENTER, LLC'S PREHEARING  
CONFERENCE STATEMENT**

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Stanton Energy Reliability Center, LLC, (SERC, LLC) in accordance with the Committee Order dated June 18, 2018, hereby files its Prehearing Conference Statement for its Application for Certification for the Stanton Energy Reliability Center (SERC). SERC, LLC is prepared to proceed to evidentiary hearing on all topic areas. In accordance with the above referenced order, SERC, LLC presents its Prehearing Conference Statement, as follows:

1. **Subject Areas Complete And Ready to Proceed To Evidentiary Hearing**

SERC, LLC believes that all subject areas (and/or disciplines) are complete and ready for adjudication at the Evidentiary Hearings.

2. **Subject Areas Where SERC, LLC Proposes To Introduce Testimony In Writing Rather Than Through Oral Testimony**

SERC, LLC proposes to introduce all of its testimony in writing rather than through oral testimony, except for the subject of Alternatives. SERC, LLC will,

however, have representatives available at the evidentiary hearing or via Webex to answer questions from the Committee.

**3. Subject Areas Not Complete and Not Ready To Proceed to Evidentiary Hearing**

None.

**4. Disputed Topic Areas Requiring Adjudication**

SERC, LLC and Staff have reached complete agreement on all subject areas and therefore there are no disputed topic areas requiring adjudication relating to the FSA, its findings, conclusions and proposed Conditions of Certification.

SERC, LLC disputes Clean Coalition's Opening Testimony and Rebuttal Testimony relating to Alternatives. Specifically, SERC, LLC agrees with Staff that the Alternatives carried forward for environmental analysis represent a reasonable range of Alternatives to satisfy the California Environmental Quality Act (CEQA). SERC, LLC agrees with Staff that the Demand Response and the Solar + Storage Alternative identified by Clean Coalition are infeasible Alternatives for CEQA consideration.

Further, SERC, LLC agrees with Staff that the SERC will not result in significant environmental impacts and will comply with all applicable LORS. Therefore, the need to carry additional Alternatives that are undefined and are not technically or commercially feasible for further environmental analysis is beyond the scope of a CEQA review. Additionally, unlike the Puente Power Project, where the Committee was being asked to determine whether the Puente Power Project was needed in order for the Commission to make findings of override, for the SERC a finding of override is not necessary and therefore the question of need is not before the Commission. Therefore any broader discussion about the way the electrical grid should be designed should remain properly within the jurisdiction of the California Public Utility Commission and not part of a purported CEQA alternative analysis in an AFC proceeding before the Commission.

Specifically, SERC, LLC believes that Clean Coalition fails to recognize the basic purpose of SERC is to provide reliability services and not energy delivery. SERC, LLC further believes that the Clean Coalition Alternatives are speculative

and lacking definition, making any further environmental analysis also too speculative. Nevertheless, SERC has provided a high level environmental analysis in the Rebuttal Testimony of Doug Davy that demonstrates it is foreseeable that the environmental impacts of Clean Coalition's proposed Alternatives may produce significant impacts.

**5. Proposed Witnesses**

The only oral testimony SERC, LLC proposes to present at the Hearing is from witnesses Kara Miles, Paul Cummins and Doug Davy relating to the subject of rebuttal to Clean Coalition's position on Alternatives. SERC, LLC believes it can produce its direct oral testimony on alternatives in approximately 20 minutes, reserving an additional 30 minutes for redirect after cross-examination.

SERC, LLC reserves the right to provide additional live oral witness testimony for other subject areas, or testimony via Webex; to rebut a Staff witness who provides testimony different from that contained in the Final Staff Assessment, to rebut any Intervenor witness, and/or to answer questions from the Committee.

**6. Cross-Examination**

SERC, LLC does not propose to cross-examine any of Staff's witnesses. SERC, LLC reserves the right to cross-examine a Staff witnesses if the Staff testimony differs from that included in the Final Staff Assessment.

SERC, LLC proposes to reserve 1 hour for cross-examination of Clean Coalition witness Douglas Karpa and/or Miles Maurino.<sup>1</sup>

**7. Exhibit List**

Table 1 is SERC, LLC's Proposed Exhibit List in the format described in the Committee Order.

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<sup>1</sup> SERC, LLC has filed a motion to strike the Testimony filed by Clean Coalition on July 9, 2018. If the motion is granted, no cross-examination will be necessary. If the motion is granted in part and limits the witness to Mr. Karpa, no cross-examination of Mr. Maurino will be necessary.

**8. Proposed Briefing Schedule**

SERC, LLC does not propose any legal briefs unless the Committee would benefit from briefing on Alternatives. In that case, SERC, LLC proposes Opening Briefs be filed one week after hearing transcripts are available with Reply Briefs filed one week after Opening Briefs.

Dated: July 13, 2018

Respectfully Submitted,



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Scott A. Galati  
Counsel to Stanton Energy Reliability Center, LLC

**Stanton Energy Reliability Center LLC (16-AFC-01)**  
**Table 1 - EXHIBIT LIST**

<b>EXHIBIT NO.</b>	<b>TN</b>	<b>TITLE</b>	<b>SUBJECT</b>
1	214206-1	<b>Transmittal Letter for the Application for Certification</b> Application for Certification Vol. 1 1 page	All
2	214206-2	<b>Title Page</b> Application for Certification Vol. 1 1 page	All
3	214206-3	<b>Acronyms</b> Application for Certification Vol. 1 7 pages	All
4	214206-4	<b>Contents</b> Application for Certification Vol. 1 11 pages	All
5	214206-5	<b>Executive Summary</b> Application for Certification Vol. 1 Executive Summary 5 pages	All
6	214206-6	<b>1.0 Introduction</b> Application for Certification Vol. 1 Introduction 12 pages	All
7	214206-7	<b>2.0 Project Description</b> Application for Certification Vol. 1 36 pages	Project Description
8	214206-8	<b>3.0 Electric Transmission</b> Application for Certification Vol. 1 11 pages	Transmission System Engineering
9	214206-9	<b>4.0 Natural Gas Supply</b> Application for Certification Vol. 1 3 pages	Transmission System Engineering

EXHIBIT NO.	TN	TITLE	SUBJECT
10	214206-10	<b>5.0 Environmental Analysis</b> Application for Certification Vol. 1 1 page	All
11	214206-11	<b>5.1 Air Quality</b> Application for Certification Vol. 1 51 pages	Air Quality
12	214206-12	<b>5.2 Biological Resources</b> Application for Certification Vol. 1 60 pages	Biological Resources
13	214206-13	<b>5.3 Cultural Resources</b> Application for Certification Vol. 1 29 pages	Cultural Resources
14	214206-14	<b>5.4 Geological Hazards and Resources</b> Application for Certification Vol. 1 12 pages	Geology & Paleontology
15	214206-15	<b>5.5 Hazardous Materials Handling</b> Application for Certification Vol. 1 24 pages	Hazardous Materials Management
16	214206-16	<b>5.6 Land Use</b> Application for Certification Vol. 1 40 pages	Land Use
17	214206-17	<b>5.7 Noise</b> Application for Certification Vol. 1 19 pages	Noise & Vibration
18	214206-18	<b>5.8 Paleontological Resources</b> Application for Certification Vol. 1 10 pages	Geology & Paleontology
19	214206-19	<b>5.9 Public Health</b> Application for Certification Vol. 1 16 pages	Public Health
20	214206-20	<b>5.10 Socioeconomics</b> Application for Certification Vol. 1 22 pages	Socioeconomics

<b>EXHIBIT NO.</b>	<b>TN</b>	<b>TITLE</b>	<b>SUBJECT</b>
21	214206-21	<b>5.11 Soils</b> Application for Certification Vol. 1 18 pages	Soil & Water Resources
22	214206-22	<b>5.12 Traffic and Transportation</b> 25 pages	Traffic & Transportation
23	214206-23	<b>5.13 Visual Resources</b> Application for Certification Vol. 1 54 pages	Visual Resources
24	214206-24	<b>5.14 Waste Management</b> Application for Certification Vol. 1 15 pages	Waste Management
25	214206-25	<b>5.15 Water Resources</b> Application for Certification Vol. 1 17 pages	Soil & Water Resources
26	214206-26	<b>5.16 Worker Health and Safety</b> Application for Certification Vol. 1 21 pages	Worker Safety & Fire Protection
27	214206-27	<b>6.0 Alternatives</b> Application for Certification Vol. 1 11 pages	Alternatives
28	214207-1	<b>Application for Certification Volume 2 -Table of Contents</b> Application for Certification Vol. 2 1 page	All
29	214207-2	<b>Appendix 1A - ALTA Survey</b> Application for Certification Vol. 2 5 pages	Land Use
30	214207-3	<b>Appendix 1B - List of Owners of Nearby Properties</b> Application for Certification Vol. 2 29 pages	Socioeconomics
31	214207-4	<b>Appendix 1C - Persons Who Prepared this AFC</b> Application for Certification Vol. 2 3 pages	All



EXHIBIT NO.	TN	TITLE	SUBJECT
32	214207-5	<b>Appendix 2A - Engineering Design Criteria</b> Application for Certification Vol. 2 20 pages	Facility Design
33	214207-6	<b>Appendix 2B - Golden State Water Will-Serve Letter</b> Application for Certification Vol. 2 2 pages	Soil & Water Resources
34	214207-7	<b>Appendix 2C - City of Stanton Can-Serve Letter</b> Application for Certification Vol. 2 2 pages	Land Use
35	214207-8	<b>Appendix 2D - Correspondence with Orange County Sanitation District Personnel</b> Application for Certification Vol. 2 3 pages	Waste Management
36	214207-9	<b>Appendix 3A - Interconnection Request Studies</b> Application for Certification Vol. 2 252 pages	Transmission System Engineering
37	214207-10	<b>Appendix 3A-1a - Addendum 1 to the Interconnection Study Report</b> Application for Certification Vol. 2 53 pages	Transmission System Engineering
38	214207-11	<b>Appendix 3A-1b - Addendum 1 to the Interconnection Study Report</b> Application for Certification Vol. 2 53 pages	Transmission Engineering System
39	214207-12	<b>Appendix 5.1A - Support Data for Emissions Calculations</b> Application for Certification Vol. 2 18 pages	Air Quality
40	214207-13	<b>Appendix 5.1B - Air Quality Impact Analysis Support Data</b> Application for Certification Vol. 2 19 pages	Air Quality

EXHIBIT NO.	TN	TITLE	SUBJECT
41	214207-14	<b>Appendix 5.1C - Dispersion Modeling Protocol</b> Application for Certification Vol. 2 2 pages	Air Quality
42	214207-15	<b>Appendix 5.1D - Risk Assessment Support Data</b> Application for Certification Vol. 2 29 pages	Air Quality Public Health
43	214207-16	<b>Appendix 5.1E - Estimated Construction Period Emissions and Impacts</b> Application for Certification Vol. 2 36 pages	Air Quality
44	214207-17	<b>Appendix 5.1F - Evaluation of Best Available Control Technology</b> Application for Certification Vol. 2 3 pages	Air Quality
45	214207-18	<b>Appendix 5.1G - Regional Emissions Inventory Data</b> Application for Certification Vol. 2 4 pages	Air Quality
46	214207-19	<b>Appendix 5.1H -Mitigation Strategy Support Data</b> Application for Certification Vol. 2 2 pages	Air Quality
47	214207-20	<b>Appendix 5.1I - Permitting Forms</b> Application for Certification Vol. 2 2 pages	Air Quality
48	214207-21	<b>Appendix 5.2A - Special-Status Species</b> Application for Certification Vol. 2 12 pages	Biological Resources
49	214207-22	<b>Appendix 5.2B - Rare Plant Survey Report</b> Application for Certification Vol. 2 18 pages	Biological Resources
50	214207-23	<b>Appendix 5.2C - Biological Resources Resumes</b> Application for Certification Vol. 2 9 pages	Biological Resources

EXHIBIT NO.	TN	TITLE	SUBJECT
51	214207-24	<b>Appendix 5.3A - Consultation Record</b> Application for Certification Vol. 2 36 pages	Cultural Resources
52	214207-27	<b>Appendix 5.3D - Cultural Resources Resumes</b> Application for Certification Vol. 2 8 pages	Cultural Resources
53	214207-28	<b>Appendix 5.4A - Preliminary Geotechnical Report</b> Application for Certification Vol. 2 178 pages	Geology and Paleontology Facility Design
54	214207-29	<b>Appendix 5.5A - Offsite Consequences Analysis</b> Application for Certification Vol. 2 14 pages	Hazardous Materials Management
55	214207-30	<b>Appendix 5.6A - Cumulative Projects</b> Application for Certification Vol. 2 4 pages	All
56	214207-31	<b>Appendix 510A - Environmental Justice Analysis</b> Application for Certification Vol. 2 33 pages	Socioeconomics Environmental Justice
57	214207-32	<b>Appendix 510B - Records of Conversation with OCFA and OCSD</b> Application for Certification Vol. 2 3 pages	Soil and Water Resources
58	214207-33	<b>Appendix 5.11A - Soil Loss Calculation</b> Application for Certification Vol. 2 7 pages	Soil and Water Resources
59	214207-34	<b>Appendix 5.13A - Design Concept</b> Application for Certification Vol. 2 2 pages	Visual Resources
60	214207-35	<b>Appendix 5.13B - Landscape Plan</b> Application for Certification Vol. 2 3 pages	Visual Resources

EXHIBIT NO.	TN	TITLE	SUBJECT
61	214207-36	<b>Appendix 5.14A -Phase I ESA</b> Application for Certification Vol. 2 477 pages	Waste Management Soil and Water Resources
62	214207-37	<b>Appendix 5.14B - Phase II ESA</b> Application for Certification Vol. 2 82 pages	Waste Management Soil and Water Resources
63	214321	<b>Stanton Energy Reliability Center LLC's AFC Air Quality Modeling Files</b> 1 page	Air Quality
64	214377	<b>Stanton Energy Reliability Center Geotechnical Report 10-27-16</b> 34 pages	Geology and Paleontology Facility Design
65	215097	<b>Stanton Energy Reliability Center Application for Certification Data Adequacy Supplement 12.20.2016</b> <b>Data Adequacy Supplement</b> 445 pages	Air Quality Cultural Resources Geology & Paleontology Introduction Project Description Socioeconomics Soil & Water Resources Traffic & Transportation Transmission System Engineering
66	215165	<b>Attachment DA3.0-1 One-Line Diagram, searchable .pdf</b> 1 page	Transmission System Engineering
67	216917	<b>Magnolia School District's Letter of Support for Stanton Energy Reliability Center</b> 2 pages	All

EXHIBIT NO.	TN	TITLE	SUBJECT
68	217179	<b>Stanton Energy Reliability Center LLC's Presentation for Public Site Visit, Environmental Scoping Mtg. and Informational Hearing</b> 21 pages	Project Description
69	217461	<b>Stanton Energy Reliability Center's Data Request Response, Set 1 (A1-A63)</b> 771 pages	Air Quality Cultural Resources Socioeconomics Transmission System Engineering Visual Resources
70	217681	<b>Response to Staff Data Requests A1-A5 Responses to South Coast Air Quality Management District Comments on AFC Section 5.1, Air Quality</b> 198 pages	Air Quality Public Health
71	217699	<b>Stanton Energy Reliability Center's Responses to Staff Data Requests A34-A35 and Revised Human Health Risk Assessment</b> 36 pages	Public Health
72	217717	<b>Air Quality Letter</b> 2 pages	Air Quality
73	217787	<b>Stanton Energy Reliability Center, LLC's Response To Staff Data Requests A1-A5 and Responses to South Coast Air Quality</b> 2 pages	Air Quality
74	218794	<b>Stanton Energy Reliability Center AFC Noise Section, Table 5.7-7, Revised</b> 2 pages	Noise and Vibration
75	220620	<b>Stanton Energy Reliability Center, LLC's Proposed Modifications to Condition of Certification HAZ-8</b> 2 pages	Hazardous Materials Management

<b>EXHIBIT NO.</b>	<b>TN</b>	<b>TITLE</b>	<b>SUBJECT</b>
76	220821	<b>Stanton Energy Reliability Center Data Request Response Set 2, for Data Requests A64 through A70</b> 17 pages	Biological Resources Cultural Resources Soil and Water Resources
77	220942	<b>Stanton Energy Reliability Center Supplemental Response to Data Request A17</b> 30 pages	Biological Resources
78	221180	<b>Letter of Support for Stanton Energy Reliability Center from Chairwoman Steel</b> 1 page	All
79	221300	<b>SERC_Data_Request_Response-Set_3-09.21.2017.pdf</b> 37 pages	Biological Resources
80	221722	<b>Stanton Energy Reliability Center, LLC Response to SCAQMD October 16, 2017</b> 17 pages	Air Quality; Public Health
81	221721	<b>Stanton Energy Reliability Center, LLC Supplemental Response to SCAQMD October 16, 2017 Letter RE Emission Guarantees</b> 3 pages	Air Quality Public Health
82	221769	<b>Barre Substation Form DPR523 dated 11.14.2017 for Cultural Resources</b> 13 pages	Cultural Resources
83	222124	<b>Stanton Energy Reliability Center LLC's Supplemental Response to Data Request A10</b> 16 pages	Air Quality
84	222519	<b>Preliminary Determination Of Compliance (PDOC) Stanton - Notice of SCAQMD PDOC - for Permits to Construct</b> 179 pages	Air Quality; Public Health
85	222545	<b>Stanton Energy Reliability Center LLC's Cumulative Air Quality Impact Analysis</b> 8 pages	Air Quality

<b>EXHIBIT NO.</b>	<b>TN</b>	<b>TITLE</b>	<b>SUBJECT</b>
86	222611	<b>Stanton Energy Reliability Center LLC's Comments on the Preliminary Determination of Compliance</b> 7 pages	Air Quality Public Health
87	222651	<b>Record of Conversation between G. Darwin and W. Qian Re Cumulative Modeling Assessment</b> 9 pages	Air Quality Public Health
88	223179	<b>Stanton Energy Reliability Center LLC's Initial Comments on the Preliminary Staff Assessment</b> 105 pages	All
89	223184	<b>Stanton Energy Reliability Center LLC's Water Quality Management Plan</b> 312 pages	Soil and Water Resources
90	223189	<b>Stanton Energy Reliability Center LLC's Initial Comments on the Preliminary Staff Assessment -Attachment A, App.5.1E Replacement</b> 8 pages	Air Quality
91	223281	<b>Stanton Energy Reliability Center LLC's Responses to PSA Workshop Queries</b> 51 pages	All
92	223293	<b>Stanton Energy Reliability Center LLC's Final Comments on the Preliminary Staff Assessment</b> 17 pages	All
93	223402	<b>Southern California Edison Company Generator Interconnection Agreement for Stanton Energy Reliability Center</b> 216 pages	Transmission System Engineering
94	223409	<b>Stanton Energy Reliability Center LLC's Supplemental Responses to PSA Workshop Query Relating to Stormwater Discharge</b> 30 pages	Soil and Water Resources
95	223414	<b>Stanton Energy Reliability Center LLC's Supplemental NOISE-7 Comment on Preliminary Staff Assessment</b> 2 pages	Noise and Vibration

<b>EXHIBIT NO.</b>	<b>TN</b>	<b>TITLE</b>	<b>SUBJECT</b>
96	223425	<b>Stanton Energy Reliability Center's Responses to Data Requests A73 through A85</b> 15 pages	Soil and Water Resources; Traffic and Transportation
97	224077	<b>National Renewable Energy Laboratory Land Use Requirements For Solar Power Plants in the United States, June 2013</b> 47 pages	Alternatives
98	224076	<b>California Independent System Operator 2019 Local Capacity Technical Analysis Final Report and Study Results</b> <b>May 15, 2018</b> 131 pages	Alternatives
99	224081	<b>CPUC Evidentiary Hearing Transcript, Application 14-11-012, May 5, 2015, Volume 1 Page 30, lines 17-23, Testimony of Jesse Bryson</b> 2 pages	Alternatives
100	224026	<b>SERC. LLC's Opening Testimony Package</b> 68 pages	All
101	224083	<b>SERC, LLC's Alternatives Rebuttal Testimony Package</b> 22 pages	Alternatives
102	224084	<b>Rebuttal to Clean Coalition Alternatives Testimony – Corrected Cost Analysis</b> 4 pages	Alternatives
103	224043	<b>Resume of Jim McLucas</b> 5 pages	Facility Design Noise and Vibration Soil and Water Resources