

DOCKETED

Docket Number:	20-SPPE-01
Project Title:	Great Oaks South Backup Generating Facility Small Power Plant Exemption
TN #:	239567
Document Title:	SV1's Prehearing Conference Statement - GOSBGF
Description:	N/A
Filer:	Scott Galati
Organization:	DayZenLLC
Submitter Role:	Applicant Representative
Submission Date:	8/31/2021 2:55:49 PM
Docketed Date:	8/31/2021

Scott A. Galati
DAYZEN LLC
1720 Park Place Drive
Carmichael, CA 95608
(916) 900-8026

STATE OF CALIFORNIA

Energy Resources
Conservation and Development Commission

In the Matter of:

Application For Small Power Plant
Exemption for the **GREAT OAKS
SOUTH BACKUP GENERATING
FACILITY**

DOCKET NO: 20-SPPE-1

**SV1, LLC'S PREHEARING
CONFERENCE STATEMENT**

SV1, LLC (SV1), in accordance with the Committee Order dated June 19, 2021 (TN 238471), hereby files its Prehearing Conference Statement for its Application for Small Power Plant Exemption (SPPE) for the Great Oaks South Backup Generating Facility (GOSBGF). SV1 is prepared to proceed to evidentiary hearing on all topic areas. In accordance with the above referenced order, SV1 presents its Prehearing Conference Statement, as follows:

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

SV1 believes that all subject areas (and/or disciplines) are complete and ready for adjudication at the Evidentiary Hearings.

2. **Subject Areas Where SV1 Proposes To Introduce Testimony In Writing Rather Than Through Oral Testimony**

SV1 proposes to introduce all testimony in writing rather than through oral testimony. In the event the Committee fails to strike Mr. Sarvey's testimony as requested in the pending motion in limine (TN 239489), SV1 reserves the right to provide oral testimony at the evidentiary hearing for those topics alone.

SV1 is in complete agreement with Staff on every issue. SV1 will also have representatives available remotely for the evidentiary hearing to answer questions from the Committee in all topic areas.

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

None.

4. **Disputed Topic Areas Requiring Adjudication**

All areas disputed by Mr. Sarvey.

5. **Proposed Witnesses**

SV1 requests that in the event the Committee requires oral testimony, the following witnesses be allowed to testify as a panel. Each has filed Opening Testimony and/or Reply Testimony. SV1 anticipates that direct and rebuttal testimony would take no more than 30 minutes, excluding Committee questions.

- Masoud Zafaripour
- David Smith
- Bruce Frandsen, and
- Michael Lisenbee

6. **Cross-Examination**

SV1 does not request cross-examination at this time. SV1 reserves the right to cross-examine Mr. Sarvey, pending the outcome of the pending motion to limine to strike Mr. Sarvey's Testimony.

7. **Exhibit List**

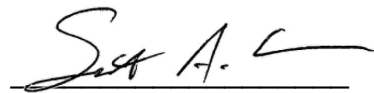
Table 1 is SV1's Proposed Exhibit List.

8. **Proposed Briefing Schedule**

SV1 does not propose any legal briefs. If helpful to the Committee, SV1 proposes a 10-minute closing statement at the end of the evidentiary hearing.

Dated: August 31, 2021

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Scott A. Galati", written over a horizontal line.

Scott A. Galati
Counsel to SV1, LLC

SV1, LLC
Great Oaks South Backup Generating Facility (20-SPPE-1)
Table 1 - EXHIBIT LIST

EXHIBIT NO.	TN	TITLE	SUBJECT
1	232466	<u>GOSBGF SPPE Application</u> Main application, absent appendices. 239 pages	All
2	232467-1	<u>GOSBGF SPPE Application Appendices A-F</u> Appendices A-F of the SPPE application 282 page(s)	Project Description, Geology and Soils, Air Quality, Public Health, Greenhouse Gasses, Biology, Cultural Resources
3	232467-2	<u>GOSBGF SPPE Application Appendix G</u> Appendices G of the SPPE application 741 page(s)	Hazardous Materials
4	232467-3	<u>GOSBGF SPPE Application Appendices H-K</u> Appendices H-K of the SPPE application 212 page(s)	Project Description, Noise, Water Resources
5	233005-1	<u>SV1 Responses to CEC Data Request Set 2</u> <u>GOSBGF - Part I</u> 463 pages	Air Quality, Public Health, Biology, Cultural, Hazardous Materials, Project Description, Utilities and Service Systems, Transportation
6	233005-2	<u>SV1 Responses to CEC Data Requests Set 2</u> <u>GOSBGF - Part II</u> 326 pages	Air Quality, Public Health, Biology, Cultural, Hazardous Materials, Project Description,

EXHIBIT NO.	TN	TITLE	SUBJECT
			Utilities and Service Systems, Transportation
7	233005-3	<u>SV1 Responses to CEC Data Requests Set GOSBGF - Part III</u> 245 pages	Air Quality, Public Health, Biology, Cultural, Hazardous Materials, Project Description, Utilities and Service Systems, Transportation
8	233005-4	<u>SV1 Responses to CEC Data Requests Set 2 GOSBGF - Part IV</u> 114 pages	Air Quality, Public Health, Biology, Cultural, Hazardous Materials, Project Description, Utilities and Service Systems, Transportation
9	233638	<u>SV1 Responses to CEC Data Request Set 3 - GOSBGF</u> 56 pages	Air Quality, Cultural Resources, Land Use, Greenhouse Gases
10	233681	<u>SV1 Supplemental Responses to CEC Data Requests 18 and 56</u> 10 pages	Air Quality, Project Description, Public Health, Soil and Water
11	233832	<u>SV1 Response to Staff IIR - GOSBGF</u> 2 pages	All

EXHIBIT NO.	TN	TITLE	SUBJECT
12	233840	<u>Presentation - Siting Committee Conference</u> 6 pages	Project Description
13	233875	<u>SV1 Supplemental Response to DR 58 - GOSBGF</u> 14 pages	Project Description
14	233924	<u>Supplemental Responses to Data Requests 65-69 - GOSBGF</u> 9 pages	Air Quality
15	233999	<u>SV1 Responses to CEC Data Requests Set 1 (1-5) - GOSBGF</u> 5 pages	Project Description
16	234479	<u>Revise AQ and HRA Modeling Analysis</u> 95 pages	Air Quality, Public Health, Greenhouse Gases
17	234485	<u>GOS Revised Alternatives Chapter 5 - SPPE Application</u> 8 pages	Alternatives
18	234586	<u>SV1 Supplemental Responses to Revised AQ Analysis</u> 6 pages	Air Quality and Public Health
19	234875	<u>SV1 Supplemental Response to DR-62 - GOSBGF</u> 2 pages	Air Quality
20	234962	<u>DPF Specifications for Life Safety Generators - GOSBGF</u> 1 page	Project Description, Air Quality, Public Health
21	235566	<u>Revised SV1 Supplemental DR-47 Response GOSBGF</u> 29 pages	Air Quality, Public Health

EXHIBIT NO.	TN	TITLE	SUBJECT
22	236336	<u>SV1 City of San Jose GHGRS Compliance Checklist</u> 18 pages	Greenhouse Gases
23	236541	<u>SV1 Supplemental Response to DR 63 - Draft VMT Analysis</u> 66 pages	Traffic and Transportation
24	237148	<u>SV1 Revised Noise Analysis - GOSBGF</u> 6 pages	Noise
25	237149	<u>GSOBGF Revised Project Description</u> 32 pages	Project Description
26	237150	<u>Hexagon Consultants Transportation Analysis - GOSBGF</u> 67 pages	Traffic and Transportation
27	237152	<u>GOSBGF Revised Air Quality and Public Health Analysis</u> 38 pages	Air Quality and Public Health
28	237205	<u>GOSBGF Ammonia Emissions Description and Spreadsheet</u> 5 pages	Air Quality and Public Health
29	237508	<u>Miratech Emission Information</u> 1 page	Air Quality, Public Health
30	238707	<u>SV1 Comments on the Draft Environmental Impact Report - - GOSBGF</u> 3 pages	All
31	239199	<u>SV1 Alternative Measure to Comply wiht City of San Jose GHGRS Plan - GOSDC</u> 34 pages	Greenhouse Gases
32	239276	<u>SV1 Opening Testimony Package - GOSBGF</u> 15 pages	All
33	239458	<u>SV1 LLC's Reply Testimony - GOSBGF</u> 3 pages	Greenhouse Gases