

## DOCKETED

<b>Docket Number:</b>	07-AFC-06C
<b>Project Title:</b>	Carlsbad Energy Center - Compliance
<b>TN #:</b>	205297
<b>Document Title:</b>	Robert Sarvey Offer of Proof
<b>Description:</b>	In Support of Sarvey Motion to Allow Testimony and Briefing on D. 15-05-05 - TN 205208
<b>Filer:</b>	Robert Sarvey
<b>Organization:</b>	Robert Sarvey
<b>Submitter Role:</b>	Intervenor
<b>Submission Date:</b>	7/9/2015 1:55:19 PM
<b>Docketed Date:</b>	7/9/2015

**BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT  
COMMISSION OF THE STATE OF CALIFORNIA**

Petition to Amend  
The Carlsbad Energy Center

Docket Number 07-AFC-06C

**ROBERT SARVEY OFFER OF PROOF**

On July 2, 2015 the Committee for 07-AFC-06C ordered me to file an offer of proof in which I describes with specificity the evidence I propose to offer regarding decision D. 15- 05-05 and its relevance to matters raised by the taking of official notice of that decision. I offer the following exhibits and will provide written testimony on these exhibits and how these exhibits impact the PMPD and its findings of fact and conclusions should the Committee decide to reopen the record.

Exhibit 6018 SDG&E Opening Comments on D. 15-05-051

SDG&E filed these opening comments on the alternate proposed decision of Michael Picker which subsequently became D. 15-05-051. SDG&E was not a party to the proceeding and yet the PMPD portrays SDG&E's PPTA application as evidence that only 633 MW of natural gas fired generation can conform to current electrical energy needs and better respond to the unanticipated and unprecedented retirement of the San Onofre Nuclear Generating Station. In these comments on the alternate decisions SDG&E states,

“SDG&E will soon be presenting its proposed short list from its pending 2014 Request for Offers (“RFO”) to its Procurement Review Group (“PRG”) (which will include, at the request of the Energy Division, a comparison between the Carlsbad Energy Center and the bids from the RFO) and expects to notify the shortlisted bidders this Summer. In addition, the Commission has important ongoing proceedings dealing with Rate Reform, Net Energy Metering, and the Distribution Resources Plan rulemaking. Additionally, the legislature is considering proposals to expand direct access and increase renewable energy goals. These

regulatory and legislative initiatives will influence utility and customer decision making long into the future. A better understanding of the outcome of the 2014 RFO as well as the direction of related Commission proceedings and legislative initiatives will better inform SDG&E and the Commission on both the need for and make up of future long-term supply-side resources. In light of these factors, SDG&E encourages the Commission to consider the results of the 2014 RFO and the direction of these relevant regulatory and legislative initiatives prior to making a final decision on the Application.”<sup>1</sup>

Exhibit 6018 clarifies SDG&E’s position on preferred resource availability and SDG&E’s intentions to pursue all available and feasible preferred resource and storage as replacement for the energy lost by the closure of SONGS and conform to current electrical needs. The filing was made on April 27<sup>th</sup> 2015 after the close of evidentiary hearings.<sup>2</sup>

#### 6019 SDG&E Advice Letter 500 MW PPTA Public Version

Exhibit 6019 is SDG&E’s filing of a new PPTA for 500 MW in response to D. 15-05-051. It is relevant to the PMPD because it provides a new description of the electrical interconnection. It provides evidence as to the flexibility of the ACECP, its efficiency, its availability, and its role in displacing less efficient energy resources according to Staff’s displacement theory. I will provide written evidence of these issues if the Committee decides to accept this exhibit into evidence. The new 500 MW PPTA was submitted to the CPUC on June 22, 2015.

#### Exhibits 6020 – 6024 Rehearing requests D. 15-05-051

The following exhibits are offered to the committee so the PMPD can clarify that D. 15-05-051 is not a final and non-appealable decision and these rehearing requests may affect the online date, size and configuration of the ACECP should it be approved by the CEC.

6020 Protect Our Communities (POC) Rehearing Request D. 15-05-051

6021 World Business Academy Rehearing Request D. 15-05-051

6022 ORA Rehearing Request D. 15-05-051

6023 CARE Rehearing Request D. 15-05-051

6024 Sierra Club Rehearing Request D. 15-05-051

6025 Center for Biological Diversity Rehearing Request D. 15-05-051

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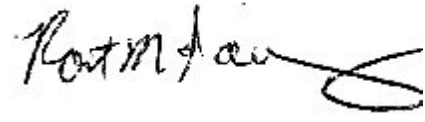
<sup>1</sup> Exhibit 2018 Pages 4,5 of 6

<sup>2</sup> <http://docs.cpuc.ca.gov/SearchRes.aspx?DocFormat=ALL&DocID=151340438>

## Conclusion

Intervenor appreciates the opportunity to clarify matters related to the PMPD's official notice of D. 15-05-051. I believe that these exhibits will clarify SDG&E's position on the proposal to downsize the CECF to 500 MW. The PPTA offers valuable information on the electrical connection and operating restrictions that affect the PMPD's analysis. Finally Exhibits 6020-6025 inform the PMPD that D. 15-05-051 is far from being a final decision as six parties have filed rehearing requests.

Respectfully submitted,

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

Robert Sarvey 7/9/15