

DOCKETED

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STATE OF CALIFORNIA
State Energy Resources
Conservation and Development Commission

In the Matter of:)	Docket No. 15-AFC-01
)	
APPLICATION FOR CERTIFICATION)	
OF THE PUENTE POWER PROJECT)	

**OPENING TESTIMONY AND EXHIBIT LIST OF THE LOS PADRES CHAPTER OF
THE SIERRA CLUB, THE ENVIRONMENTAL COALITION OF VENTURA COUNTY,
AND THE ENVIRONMENTAL DEFENSE CENTER**

Exhibit No. 4019

January 18, 2017

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INTRODUCTION

Intervenors Sierra Club Los Padres Chapter, the Environmental Coalition of Ventura County, and the Environmental Defense Center (collectively, Intervenors) timely provide this Opening Testimony regarding the application for certification of the Puente Power Project.

All of the testimony presented herein was prepared by the person testifying. A signed declaration and resume has been provided for each person. All exhibits referenced in the opening testimony are filed concurrently with this testimony or are CEC documents for which official notice is proper and requested. A complete Exhibit List will be provided with Intervenors' Pre-hearing Conference Statement.

Intervenors reserve the right to supplement and/or revise this testimony at any time up to and including the close of the evidentiary hearings. Moreover, many of the factual issues discussed in this Opening Testimony involve both legal and factual questions while others are predominately legal issues. Therefore, Intervenors respectfully reserve the right to address all disputed issues identified at the hearings through testimony, rebuttal, cross-examination, or at later stages of this process including in briefing following the evidentiary hearing.

OPENING TESTIMONY SUBMITTED FOR PROJECT PROPOSAL

- 1. Opening Testimony of Matthew Vespa, CV, and Declaration**
- 2. Opening Testimony of Lawrence E. Hunt, CV, and Declaration**

INCORPORATION OF PRELIMINARY STAFF ASSESSMENT COMMENTS

Intervenors reserve the right to rely on their Comments on the Preliminary Staff Assessment (TN #213635) and all documents attached thereto.

EXHIBIT LIST

- EXHIBIT 4000:** Opening Testimony of Matthew Vespa, CV, and Declaration.
- EXHIBIT 4001:** Testimony of Jesse Bryson, *Application of Southern California Edison Company for Approval of the Results of its 2013 Local Capacity Requirements Request for Offers for the Moorpark Sub-Area*, No. A.14-11-016 (May 27, 2015).
- EXHIBIT 4002:** Southern California Edison, Goleta-Area RFO Announcement (Nov. 30, 2017)
- EXHIBIT 4003:** Data Request Sierra Club-SCE-3, *Application of SCE for Approval of Results of 2013 Moorpark RFO*, A.14-11-016 (Oct. 10, 2016)

- EXHIBIT 4004:** Data Request ORA-SCE-4, *Application of SCE for Approval of Results of 2013 Moorpark RFO*, A.14-11-016 (Sept. 20, 2016)
- EXHIBIT 4005:** SCE Phase 2 Opening Testimony (Public Version), *Application of SCE for Approval of Results of 2013 Moorpark RFO*, A.14-11-016 (Sept. 22, 2016)
- EXHIBIT 4006:** Phase 2 Transcript, *Application of SCE for Approval of Results of 2013 Moorpark RFO*, A.14-11-016 (Nov. 1, 2016)
- EXHIBIT 4007:** Exh. SCE 1 (Public Version), *Application of SCE for Approval of Results of 2013 Moorpark RFO*, A.16-11-002, (Nov. 4, 2016)
- EXHIBIT 4008:** SCE Data Request Response Sierra Club-SCE-04, *Application of SCE for Approval of Results of 2013 Moorpark RFO*, A.14-11-016 (Oct. 10, 2016)
- EXHIBIT 4009:** Testimony of SCE on the Results of its 2013 LCR RFO for the Western Los Angeles Basin (Public Version), *Application of SCE for Approval of Results of 2013 Moorpark RFO*, A.14-11-012, (Nov. 21, 2014)
- EXHIBIT 4010:** CAISO 2015-2016 Transmission Plan, appx. D
- EXHIBIT 4011:** CAISO 2014-2015 Transmission Plan, appx. E
- EXHIBIT 4012:** CPUC Resolution E-4791 (May, 26, 2016)
- EXHIBIT 4013:** SCE Advice Letter 3454-E (Submission of Santa Paula 1 Contract for Expedited Review and Approval by September 15, 2016)
- EXHIBIT 4014:** SCE Advice Letter 3455-E (Submission of Pomona Battery Storage 1 Contract for Expedited Review and Approval by September 15, 2016)
- EXHIBIT 4015:** SCE Advice Letter 3456-E (Submission of the Grand Johanna Contract for Expedited Review and Approval by September 15, 2016)
- EXHIBIT 4016:** R.13-09-011, *Assigned Commissioner's Ruling Directing Activities In Response to Natural Gas Leak at Aliso Canyon* (Mar. 23, 2016)
- EXHIBIT 4017:** Opening Testimony of Lawrence E. Hunt, CV, and Declaration
- EXHIBIT 4018:** Beller et al., Historical ecology of the Lower Santa Clara River, Ventura River, and Oxnard Plan: An Analysis of Terrestrial, Riverine, and Coastal Habitats, p. 203 fig. 6.11 (San Francisco Bay Estuary Institute, 2011)
- EXHIBIT 4019:** Opening Testimony and Exhibit List of Sierra Club, Los Padres Chapter; Environmental Coalition of Ventura County; Environmental Defense Center

- EXHIBIT 4020:** City of Oxnard 2030 General Plan
- EXHIBIT 4021:** City of Oxnard 2016 General Plan Amendment
- EXHIBIT 4022:** Letter from the California Coastal Commission re: Determination of General Plan Amendment Applicability
- EXHIBIT 4023:** Applicant's Response to CEC Data Request No. 77-85
- EXHIBIT 4024:** City of Oxnard Coastal Land Use Plan
- EXHIBIT 4025:** Letter from Edmund Port, California Department of Fish and Wildlife, to Janea Scott, California Energy Commission (Oct. 13, 2016)
- EXHIBIT 4026:** California Coastal Commission 30413(d) Report (Sept. 15, 2016)

Respectfully submitted,

Dated: January 18, 2017

s/ Matthew A. Smith

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