DOCKETED	
Docket Number:	15-AFC-01
Project Title:	Puente Power Project
TN #:	218228
Document Title:	City of Oxnard's Request for Adjustment to Study Schedule
Description:	N/A
Filer:	PATRICIA LARKIN
Organization:	SHUTE, MIHALY & WEINBERGER LLP
Submitter Role:	Intervenor Representative
Submission Date:	6/13/2017 12:13:27 PM
Docketed Date:	6/13/2017

STATE OF CALIFORNIA

ENERGY RESOURCES CONSERVATION AND DEVELOPMENT COMMISSION

In the matter of:

Application for Certification of the **PUENTE POWER PROJECT**

DOCKET NO. 15-AFC-01

CITY OF OXNARD'S REQUEST FOR ADJUSTMENT TO STUDY SCHEDULE

ELLISON FOLK (State Bar No. 149232) EDWARD T. SCHEXNAYDER (State Bar No. 284494) SHUTE, MIHALY & WEINBERGER LLP 396 Hayes Street San Francisco, California 94102 Telephone: (415) 552-7272 Facsimile: (415) 552-5816 Folk@smwlaw.com Schexnayder@smwlaw.com

Attorneys for the CITY OF OXNARD

The City of Oxnard supports the Committee's decision accepting CAISO's offer to conduct a study of local capacity requirements in the Moorpark subarea and one or more portfolios that would meet those requirements. Such an analysis will provide important information regarding whether the identified LCR need can be met with resources that do not rely on conventional gas generation, such as Puente. However, the City requests that an additional week be added to the schedule to allow the parties an opportunity to comment on CAISO's assumptions before it runs its analysis. The City proposes that the parties be given one week to comment on CAISO's study assumptions, but there would be no provision for replies or oppositions. Providing an opportunity for comment on the study will air any concerns regarding its scope before it is completed and will enable CAISO to modify the study if it believes a modification is necessary. Ultimately, because the assumptions underlying any study will influence its conclusions, making concerns known at the beginning of the process could avoid delay on the back end.

DATED: June 13, 2017

SHUTE, MIHALY & WEINBERGER LLP

By: /s/ Ellison Folk ELLISON FOLK EDWARD T. SCHEXNAYDER

Attorneys for the CITY OF OXNARD

901858.1