

## DOCKETED

<b>Docket Number:</b>	15-AFC-01
<b>Project Title:</b>	Puente Power Project
<b>TN #:</b>	221106
<b>Document Title:</b>	Applicant's Motion to Strike Portions of the James H. Caldwell Testimony in Response to CAISO Report
<b>Description:</b>	N/A
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<b>Organization:</b>	Latham & Watkins LLP
<b>Submitter Role:</b>	Applicant Representative
<b>Submission Date:</b>	9/8/2017 4:46:57 PM
<b>Docketed Date:</b>	9/8/2017

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9 Energy Resources

10 Conservation and Development Commission

11 In the Matter of:

12 Application for Certification  
13 for the PUENTE POWER PROJECT

Docket No. 15-AFC-01

14 APPLICANT'S MOTION TO STRIKE  
15 PORTIONS OF THE JAMES H. CALDWELL  
16 TESTIMONY IN RESPONSE TO CAISO  
17 REPORT

18 Pursuant to Title 20, California Code of Regulations ("CCR") § 1211.5(a) and  
19 § 1212(b)(2), Applicant hereby requests that the Committee exercise its authority under Title 20,  
20 CCR § 1203(c) to strike portions of the "James H. Caldwell Testimony in Response to CAISO  
21 Report" (TN #220974) ("Caldwell Testimony") on the basis that it is outside the scope of the  
22 upcoming evidentiary hearings.

23 On June 20, 2017, the Committee issued "Committee Orders Extending ISO Study Time,  
24 Denying City Request for Additional Time and Revised Committee Schedule" (TN #219815)  
25 (the "June 20 Orders"). In the June 20 Orders, the Committee accepted an offer made by the  
26 California Independent System Operator ("CAISO") to conduct a special study of the Moorpark  
27 Sub-Area (the "CAISO Special Study"). June 20 Orders at 3.

28 The design of the CAISO Special Study, including the preferred resources portfolios to  
be analyzed, was determined by the CAISO with input from Southern California Edison and the  
public. The CAISO hosted a public webinar for the specific purpose of soliciting input on the

1 preferred resources portfolios to be analyzed. (TN #219141). This allowed the Parties and the  
2 public an opportunity to participate in the design of the study parameters.

3 The parties were invited to submit additional evidence “in response to California ISO  
4 Study.” August 25 Orders at 3. The Committee did not extend an invitation to the Parties to  
5 develop and present their own proposed alternatives to the Puente Power Project, as the Caldwell  
6 Testimony attempts to do in its discussion of “a fourth scenario.”

7 Therefore, additional proposed alternatives to the Project, beyond those analyzed in the  
8 CAISO Special Study, are beyond the scope of the upcoming evidentiary hearings, and any  
9 discussion of such additional alternatives in the filed testimony must be stricken. Furthermore,  
10 no oral testimony on such alternatives can be taken during the evidentiary hearings.

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12 DATED: September 8, 2017

Respectfully submitted,

13 */s/ Michael J. Carroll*

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