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STATE OF CALIFORNIA
Energy Resources Conservation and
Development Commission

In the Matter of: APPLICATION FOR CERTIFICATION OF THE STANTON ENERGY RELIABILITY CENTER	Docket No. 16-AFC-01 Intervenor Clean Coalition
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Clean Coalition Prehearing Conference Statement

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CLEAN COALITION PREHEARING CONFERENCE STATEMENT

The Clean Coalition hereby provides their Prehearing Conference Statement that addresses the sections required under the June 20, 2018 Notice of Prehearing Conference and Evidentiary Hearing, Scheduling Order, and Further Orders, which include:

1. The subject areas that are complete and ready to proceed to Evidentiary Hearing.

The Clean Coalition has only reviewed the alternatives analysis, but believes that subject area is ready to proceed to evidentiary hearing.

2. The subject areas upon which any party proposes to introduce testimony in writing rather than through oral testimony.

None.

3. The subject areas that are not complete and not yet ready to proceed to Evidentiary Hearing and the reasons therefor.

None.

4. The subject areas that remain disputed and require adjudication, and the precise nature of the dispute for each issue.

For the subject area of alternatives analysis, the following issues remain in dispute:¹ whether there are feasible alternatives identified either in the Staff Assessment or in testimony that could reduce or avoid the project's significant environmental impacts. The specific sub-issues that will shed light on whether alternative designs could be deemed feasible will turn on the specific engineering requirements for the SERC projects and the capabilities, design alternatives, and cost issues related to both solar and storage alternatives and the Battery Energy Storage Alternatives.

5. The identity of each witness the party intends to examine at the Evidentiary Hearing, the subject area(s) about which the witness(es) will offer testimony, whether the testimony will be oral or in writing, a brief summary of the

¹ The Clean Coalition respectfully reserves the right to address any and all disputed issues, including those factual questions arising during the process at later stages of this process, including but not limited to, during reply briefing, briefing on the California ISO Study, and in response to any PMPD.

testimony to be offered by the witness(es), qualifications of each witness, the time required to present testimony by each witness, and whether the witness seeks to testify telephonically.

Dr. Doug Karpa, scope of alternatives and feasibility of alternatives to lessen climate change and air quality impacts. This testimony will be oral and will present the results of analysis of the feasibility of using a solar and energy storage alternative to reduce environmental impacts. Dr. Karpa will address issues of the design of solar+storage or battery storage alternatives to match the performance requirements of SERC and the issues and approaches to developing a cost analysis of such effective. Dr. Doug Karpa has experience with a range of modeling approaches in scientific and CEQA analyses, including biological population modeling, traffic modeling, air quality modeling, and economic analysis of distributed energy resources. Dr. Karpa will require 45 minutes to testify and requests to appear by telephone.

- 6. Subject areas upon which the party desires to question the other parties' witness(es), a summary of the scope of the questions (including witness qualifications), the issue(s) to which the questions pertain, and the time desired to question each witness. NOTE: A party who fails to provide, with specificity, the scope, relevance and time for questioning other parties' witness(es) risks preclusion from questioning on that subject area.**

If the informal process is used, the Clean Coalition anticipates asking questions on the following topics of panelists as appropriate to the panelist in whose expertise the question falls.

The Clean Coalition requests the following time for questioning of SERC's representatives:

Paul Cummins, on witness qualifications, economic projections for SERC operation, issues related to solar and storage deployment, matters related to renewable energy alternatives. These issues relate to the feasibility and relative merits of alternatives analyzed within the scope of the CEQA analysis. Time: 20-30 minutes.

Douglas Davy, on witness qualifications, economic projections for SERC operation, issues related to solar and storage deployment, matters related to renewable energy alternatives. These issues relate to the feasibility and relative merits of alternatives analyzed within the scope of the CEQA analysis. Time: 20-30 minutes.

Kara Miles, on witness qualifications, economic projections for SERC operation, issues related to solar and storage deployment, matters related to renewable energy alternatives. These issues relate to the feasibility and relative merits of

alternatives analyzed within the scope of the CEQA analysis. Time: 20-30 minutes.

The Clean Coalition requests the following time for questioning of Energy Commission Staff:

Lisa DeCarlo, on witness qualifications, design of solar-plus-storage and battery energy storage alternatives, cost evaluation of such alternatives and matters related to renewable energy alternatives. These issues relate to the feasibility and relative merits of alternatives analyzed within the scope of the CEQA analysis. Time: 20-30 minutes.

David Vidaver, on witness qualifications, design of solar-plus-storage and battery energy storage alternatives, cost evaluation of such alternatives and matters related to renewable energy alternatives. These issues relate to the feasibility and relative merits of alternatives analyzed within the scope of the CEQA analysis. Time: 20-30 minutes.

Matthew Layton, on witness qualifications, design of solar-plus-storage and battery energy storage alternatives, cost evaluation of such alternatives and matters related to renewable energy alternatives. These issues relate to the feasibility and relative merits of alternatives analyzed within the scope of the CEQA analysis. Time: 20-30 minutes.

7. A list identifying exhibits with transaction numbers (TN) that the party intends to offer into evidence during the Evidentiary Hearing and the technical subject areas to which they apply (see below for further details on Exhibit Lists).

The Clean Coalition will offer the following documents and exhibits into testimony:

- **TN#: 224025** - (Opening Testimony of Clean Coalition)
- **TN#: 224086** - (Clean Coalition Rebuttal Testimony)
- **TN#: 224169** - (LBNL Article - Demand Response Potential)
- **TN#: 224168** - (Integrating Increased Demand Response and Dynamic Price Response into NYISO Markets)
- **TN#: 224167** - (FERC 2015 Assessment of DR and AMI)
- **TN#: 224165** - (SCE Demand Response Programs)
- **TN#: 224163** - (GreenBiz Article - Here comes the sun: Solar plus storage energy solutions get competitive)

- **TN#: 224162** - (Carbon Budget Article)
- **TN#: 224161** - (NREL Advanced Inverter Article)
- **TN#: 224160** - (KIUC SolarCity Selects Battery System for Kaua'i Co-op Solar Storage Project)
- **TN#: 224159** - (Renewables Now, Hawaii regulators approve solar-plus-storage project on Kaua'i)
- **TN#: 224158** - (Clean Coalition Solar Siting Surveys)
- **TN#: 224157** - (United States Energy Information Administration 2018 Annual Energy Outlook)
- **TN#: 224156** - (CPUC Decision 15-11-041)
- **TN#: 224155** - (CPUC Decision 16-09-004)
- **TN#: 224154** - (CPUC Decision 16-05-050)

8. Proposals for briefing deadlines, impact of scheduling conflicts, or other scheduling matters.

None.