

## DOCKETED

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Hello,

Thank you allowing public comment on the NRG Puente Power Project, also known as P3.

My name is Kyle Field and I am a 25 year Ventura County resident. I currently live in Ventura with my wife and 2 young children.

I have spent the last 20 years of my career working at a local manufacturing facility where I currently serve as the Environmental Engineer. The vast majority of my work there is spent analyzing the various conditions of our air permits and working to ensure that we meet or exceed our compliance requirements.

Outside of work, I write for CleanTechnica, one of the leading clean technology news sites in the world, covering energy storage, solar and electric vehicles. At home, we have solar on our roof that powers our home and 2 electric cars while also saving us money.

With this experience, I have a keen interest in P3 and the impact it will have on our community. Local residents, local representatives and many of our state representatives have shared that they believe P3 will:

- Add an incremental burden of pollution to an already disadvantaged community.
- Negatively impact asthma rates in the greater Oxnard area that are already in the 90th percentile.
- Add unneeded production capacity to an already over capacity power grid.
- Increase the financial burden on SCE ratepayers.

And while these are valid and powerful points of objection, I believe they have been covered sufficiently in previously shared public statements. I would like to start by stating for the record that I am opposed to the Puente Power Project for the reasons above as well as a few other critical items:

1. **Increase in Emissions** - P3 is a peaker facility that meets emissions standards by reducing the permitted "potential to emit" by cutting run days from 365 days per year to 90 days per year. The Mandalay Generating Station (MGS) never ran 365 days per year so that is not a "real" reduction.

Comparing the *actual* 2015 emissions to the permitted emissions for the new facility ironically reveals a net increase of 29.93 TONS of Nitrous Oxides versus the previous permit. NOX is a key component to the formation of ozone which when breathed in, can trigger asthma attacks. In light of the asthma related statistics shared by CAUSE and others, this is an unacceptable incremental burden to place on a community already bearing the brunt of the power generation related pollution for our area.

2. **Alternatives to Peakers Exist** - Viable, cost effective alternatives to Natural Gas powered peaker facilities are being installed by today...ironically, by SCE, right here in Southern California. Just 100 miles east of Oxnard at the Mira Loma substation, SCE installed an 80mWh energy storage facility that serves the same function as the P3 unit but...with zero pollution, zero impact to people's health, a nearly instantaneous ability to respond to demand increases and the batteries can be installed anywhere. Alternatives exist...alternatives that are made in America (creating American jobs)...alternatives that are cost effective, TODAY.

SCE obviously thinks so. Grid Scale Batteries are a clear alternative to antiquated fossil fuel fired power generation facilities and pair perfectly with the excess production coming from residential and utility scale solar that is flooding the grid. To that effect, per the CEC Renewables Report dated December 22, 2016.... 8,166 MW of solar capacity are online in California today with another 7,760 MW of solar already permitted for installation.

When zero emission alternatives exist, are cost competitive and already being installed by this very same utility, it is clear that we should not be here debating “Why **shouldn’t** we install this peaker facility” but rather, NRG should be here trying to convince us why we should let it be installed on our coastline because there is absolutely no basis for it.

3. **Job Creation** - On Tuesday, February 7th, 2017 during the public comment period of the CEC hearing for P3, a member of Local 433 spoke about how local 433 wants to work and is trained in both the installation of renewables and fossil fuel fired generation facilities.

To that effect, Bloomberg reported in May 2016 that in 2015, The number of U.S. jobs in solar energy overtook those in oil and natural gas extraction for the first time, helping drive a global surge in employment in the clean-energy business as fossil-fuel companies faltered.

In summary, If we really care about the stability of our local grid, the health of our people, preserving our planet for future generations and keeping our local workers employed, we will shut down this unnecessary and unwanted project and instead install reliable, readily accessible battery and solar technology.

Thank you.

Kyle Field

Ventura Resident