

DOCKETED

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Comment Received From: Damon Moglen

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Friends of the Earth Comment on Draft 2015 IEPR Scoping Order, Docket No.15-IEPR-01

Additional submitted attachment is included below.



Commissioner Andrew McAllister
California Energy Commission
1516 Ninth Street, MS-31
Sacramento, CA 95814

Transmitted by email to: doCKET@energy.ca.gov

February 6, 2015

Re: Public Comment on Draft 2015 IEPR Scoping Order, Docket No.15-IEPR-01

Dear Commissioner McAllister:

We are concerned that the Energy Commission's Draft 2015 IEPR Scoping Order neglects consideration of planning for transition to renewables to replace the power that currently is provided by the controversial, at-risk nuclear reactors at Diablo Canyon. Facing massive economic, safety and technical hurdles, it appears certain that Diablo Canyon will not operate beyond its current licensing (2024/25) and is highly likely to be shut down in advance and perhaps even in the near future given the dangers inherent in the new seismic information produced in the AB1632 studies and the legal challenges the plant now faces. The Energy Commission was a leader in calling for a "Plan B" to replace power from San Onofre, and in seeking to learn the lessons posed by the plant's precipitous closure. It needs to apply those lessons now, in the 2015 IEPR process, to assure that the state has a plan to replace power needed from Diablo with clean, safe, carbon-free renewable energy in line with the state's policy on climate change and renewable energy.

Friends of the Earth has petitioned the California Public Utility Commission to begin an investigation into the economic prudence of spending any further ratepayer monies on Diablo given the already high cost of electricity generated by the plant, given the massive cost increases that will be required by environmental and safety upgrades, given the increasingly cost competitive nature of new renewable energy sources, and given the immense economic risks posed by the continued operation of 1960 vintage nuclear reactors operating outside of their licenses on a seismically active site that would never be chosen as the venue for a new plant. We believe that it is essential that the Energy Commission conduct a parallel analysis, a power "Plan B", that will immediately move to identify the necessary preferred, renewable resources that should be used to replace Diablo Canyon.

Therefore, we recommend consideration of the following questions relating to Diablo Canyon in the 2015 IEPR:

- Assess what mixture of renewable energy, energy efficiency and energy storage should be proposed for the replacement of power needed to replace Diablo Canyon
- Stemming from the lessons learned from the precipitous closure and replacement of San Onofre with carbon emission producing gas-fired power plants, the commission should produce scenarios in which Diablo would be replaced in the immediate near term, in the next few years, and as of 2024/25 when the plant reaches the end of its current licenses.
- Assess the ways in which continued operation of Diablo Canyon will increasingly curtail the growth of renewable energy as mandated by current state policy and the Governor's proposed increase of renewable energy to 50% by 2030.

We look forward to working with the Energy Commission on these important issues.

Sincerely,

A handwritten signature in black ink that reads "Damon Moglen".

Damon Moglen
Senior Strategic Advisor
Climate and Energy Program
Friends of the Earth

cc: CEC Commissioners, CPUC President Michael Picker, CPUC Commissioner Mike Florio

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