

DOCKETED

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CITY OF
CARLSBAD
Office of the City Council

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October 14, 2014

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 07-AFC-06C
1516 Ninth Street
Sacramento, CA 95814-5512

Commissioners Karen Douglas and Andrew McAllister:

The City of Carlsbad has expressed its strong support of the amended CECP because of electricity reliability needs in Southern California following the closure of the San Onofre Nuclear Generating Station, the state's policy to eliminate once-through cooling at power plants located on the coast, and a commitment by NRG to demolish and remove the Encina Power Station. The City has expressed its views in the Settlement Agreement with NRG and SDG&E; my comments and those of Council Member Wood at the August 7, 2014 Committee Conference in this proceeding; and written comments (attached) submitted following the Commission's August 20, 2014 Workshop on Southern California Energy Reliability. The City has urged the Commission to "thoughtfully but expeditiously permit the amended CECP." City staff have also made responding to CEC inquiries a top priority and have provided timely and thorough responses to facilitate the amended CECP project.

It was, consequently, a disappointment to the City that the Committee's recent Scheduling Order did not appear to reflect the same sense of urgency in reviewing the Amended CECP. The City notes that the only definitive dates identified in the Order were for events that have passed or for the close of discovery. Rather than establishing target dates for processing the Petition, the Committee only stated that future events, including adoption of the decision, were "Tbd." If the amended CECP is to be in operation in time to meet the closure date for the Encina Power Station in December 2017 and meet the joint agencies' Southern California electricity reliability plan, it appears that the Commission will need to issue a decision on the amended CECP early in the summer of 2015, particularly since as a result of a CEC decision the abandoned oil tanks cannot be removed prior to a decision on the CECP modification.

This same perceived lack of urgency was reflected in timing of the Committee's order to consolidate the two petitions. This seemingly straightforward decision required 6 weeks.

To facilitate a thoughtful but expeditious review of the amended CECP and achieve the benefits of ensuring regional electricity reliability, reducing impacts of once-through cooling, and removing the Encina Power Station, the City of Carlsbad requests that the Committee issue a modified scheduling order with specific target dates for the various activities and decisions. As a public decision-making body, the City recognizes these dates may have some degree of



flexibility but also recognizes the value of a clear schedule for communicating expectations and commitment to all parties involved, but especially to our public.

Thank you for considering this request.

Sincerely,

A handwritten signature in blue ink that reads "Mark Packard". The signature is fluid and cursive, with the first name "Mark" and last name "Packard" clearly distinguishable.

Mark Packard
Mayor Pro Tem