

## DOCKETED

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# Power of Vision

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Via E Filing  
December 1, 2014  
Carlsbad Energy Center Project (07-AFC-06C)

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Andrew McAllister, Commissioner and Associate Member  
California Energy Commission  
1516 Ninth Street  
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## **Power of Vision's December 1, 2014 Status Report**

POV continues in its efforts to protect the I-5 corridor adjacent to the CECP from visual blight due to the new location proposed by the PTA for the transmission line from the generating units to the SDG&E switchyard. This corridor is traversed by almost 200,00 vehicles daily. We have petitioned the Committee (TN#203338) for an order directing the applicant to supply responses to POV's data request numbers 8,9,11,12, & 13. We believe that the responses to our data requests will allow the Committee to determine that there are more appropriate solutions for resolving the transmission line visual impacts than thus far "conceded" by the applicant.

POV fails to understand the applicant's persistence in objecting to our data requests on the basis of the previously approved CECP VIS requirements, when those requirements were superseded by the PTA's changing the visual impacts when it changed the location of the transmission line. Such inappropriate references to the previously approved CECP raises a much more fundamental question: are there so many fundamental differences between the proposed power plant from the approved CECP that a new AFC should have been proposed, rather than a PTA. For example, some of the alternatives in the original CECP were rejected because the smokestacks were high enough to interfere with flight patterns at the Palomar airport. Would the lower smokestack heights of the LM1000 GE turbines make these rejected sites viable. Such questions are not considered in a PTA but would be considered in an AFC. Also, we have not yet seen the PDOC, so we cannot ascertain if there are significant differences in air quality emissions between the PTA and approved CECP that could better be handled by an AFC rather than a PTA.

Further regarding the PDOC, the applicant indicates in their status report 3 (TN#203384) that CEC Staff can complete their PSA according to the Revised Scheduling Order since Staff has received a draft of the PDOC. Unfortunately, this private communication was not docketed or made available to the intervenors, thus denying us of the opportunity to make comments that Staff could consider as relevant to their PSA.

We wish to reiterate that POV originally was not opposed to the concepts of the PTA, with the exception of its visual impacts. However, as time goes by, we are discovering more and more aspects of the PTA that we find disturbing.

Julie Baker

Arnold Roe, Ph.D.