

DOCKETED

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BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT
COMMISSION OF THE STATE OF CALIFORNIA
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PETITIONS TO AMEND THE

CARLSBAD ENERGY CENTER PROJECT

Docket No. 07-AFC-06C

ENERGY COMMISSION STAFF SUPPLEMENTARY
COMMENTS ON PRESIDING MEMBER'S PROPOSED DECISION (PMPD)

At the June 29 hearing to take comments on the PMPD, the Committee asked staff to explain several of its earlier comments, including the explanation for why the requirements for recycling of materials from the removal of the Encina Power Station in condition **Waste-5** would reduce project greenhouse gas (GHG) emissions. Staff's response on the **Waste-5** question was requested in the form of a supplementary filing.

The answer is that recycling of existing materials, including the large volumes of steel and cement found in building demolitions wastes, facilitates the "re-use" of such materials. That re-use in turn reduces the GHG emissions that are caused by the "full-cycle" production of new materials that would otherwise be necessary in the absence of recycling. This GHG advantage from the recycling of materials is discussed in the Final Staff Assessment (FSA) as follows:

Therefore, while there is considerably more total construction/demolition work proposed than was proposed for the licensed CECP, the total emissions estimate for the amended CECP construction is lower than estimated for the licensed CECP and the total emissions including the EPS demolition is only approximately 46 percent greater than that estimated for the licensed CECP. Secondary and indirect GHG emissions sources have not been estimated, but *staff concludes*

that the balance of those GHG emissions is likely a reduction in GHG emissions give the large amount of steel and concrete that would be recycled. (FSA, p. AQ 1-11 [italics added].)

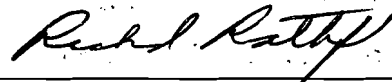
Staff believes that the small GHG emission increases from construction/demolition activities would not be significant for several reasons. First, *staff is recommending a condition of certification in the Waste Management section (**Waste-5**), that requires construction/demolition wastes be recycled during the amended CECP construction and during Encina demolition (FSA, p. AQ-14 [italics added].)*

The amended CECP would have less than significant impacts by complying with applicable regulations and plans related to the reduction of GHG emissions as follows:

- The amended CECP would be subject to compliance with the AB 32 Cap and Trade regulation that implements the state's regulatory plan for reducing GHG emissions from the electricity sector; and
- *The amended CECP would recycle construction and demolition wastes to reduce GHG emissions from construction and demolition activities (as required by **Waste-5**) to comply with state policy and local Climate Action Plans. (FSA, p. AQ1-39 [italics added].)*

Date: July 7, 2015

Respectfully Submitted,



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