

Good cause for late petition to intervene RE: Bill Powers, P.E. petition to intervene in Pio Pico Energy Center proceeding 11-AFC-01

Bill Powers [bpowers@powersengineering.com]

Sent: Thursday, July 05, 2012 2:24 PM

To: Energy - Docket Optical System

Cc: grchandler@apexpowergroup.com; djenkins@apexpowergroup.com; MFitzgerald@sierraresearch.com; jamckinsey@stoel.com; mafoster@stoel.com; e-recipient@caiso.com; aprilsommerlaw@yahoo.com; Peterman, Carla@Energy; Douglas, Karen@Energy; Renaud, Raoul@Energy; Bartridge, Jim@Energy; Lemei, Galen@Energy; Solorio, Eric@Energy; Bell, Kevin W@Energy; Allen, Eileen@Energy; Energy - Public Adviser's Office

Subject: Good Cause for Late Petition to Intervene

I was an expert witness for the Environmental Health Coalition in the 100 MW Chula Vista Energy Upgrade Project proceeding in 2009. The CEC denied that project on LORS incompatibility but also noted in the denial that a much more extensive evaluation of the rooftop PV alternative would be necessary in any subsequent re-application based on testimony I provided in the hearing on rooftop PV availability and cost-effectiveness. Since that denial the Governor has established a target of 12,000 MW of new local renewable energy by 2020. This development puts substantially greater state-level focus on the urban PV alternative than existed in 2009.

The San Diego area has multiple gas turbine projects in various stages of permitting/development. These include Carlsbad Energy Center, Pio Pico, Quail Brush, and Escondido Energy Center. Outside of the 2000-2001 energy crisis, this is an unprecedented number of concurrent local gas turbine/engine projects in development. The large number of concurrent projects has made it difficult to volunteer time on all of these projects. My available time has primarily been focused on Quail Brush due to its sensitive location and the degree of local controversy it has caused.

The local solar alternative has been a major focus of the local discussion surrounding Quail Brush. I reviewed the FSA for Pio Pico earlier this week to understand the degree of analysis that the CEC is conducting of the local solar alternative in the Pio Pico proceeding as a preview to what could be expected in the Quail Brush CEC proceeding. There is no local solar alternative analysis in the Pio Pico FSA. Local solar is summarily dismissed by the applicant as a non-dispatchable resource that cannot meet project objectives.

I did not anticipate that there would be no substantive discussion of the rooftop solar alternative, or any other alternative high in the loading order such as energy efficiency and demand response, in the Pio Pico FSA. I think the record in the Pio Pico proceeding would be significantly improved by approving my request to intervene. I am prepared to submit rebuttal testimony and a pre-conference hearing statement by the July 6th deadline and to participate in the July 23rd hearing in Chula Vista.

Regards,

Bill Powers, P.E.
Powers Engineering



From: Bill Powers [mailto:bpowers@powersengineering.com]

Sent: Wednesday, July 04, 2012 4:19 PM

To: docket@energy.state.ca.us

Cc: 'grchandler@apexpowergroup.com'; 'djenkins@apexpowergroup.com'; 'MFitzgerald@sierraresearch.com'; 'jamckinsey@stoel.com'; 'mafoster@stoel.com'; 'e-recipient@caiso.com'; 'aprilsommerlaw@yahoo.com'; 'carla.peterman@energy.ca.gov'; 'karen.douglas@energy.ca.gov'; 'raoul.renaud@energy.ca.gov'; 'jim.bartridge@energy.ca.gov'; 'galen.lemei@energy.ca.gov'; 'eric.solorio@energy.ca.gov'; 'kevin.w.bell@energy.ca.gov'; 'eileen.allen@energy.ca.gov'; 'publicadviser@energy.ca.gov'

Subject: Bill Powers, P.E. petition to intervene in Pio Pico Energy Center proceeding 11-AFC-01

CEC Dockets:

Please find attached my application to intervene in the Pio Pico Energy Center proceeding, Docket 11-AFC-01. I would like to participate by telephone in the July 9, 2012 pre-conference hearing in Sacramento and in person in the July 23, 2012 hearing in Chula Vista. The current Proof of Service list for Docket 11-AFC-01 is copied on this e-mail.

Regards,

Bill Powers, P.E.
Powers Engineering
4452 Park Blvd., Suite 209
San Diego, CA 92116

619-195-2072 (o)
619-295-2073 (f)
619-917-2941 (c)