



ORANGE COUNTY
COASTKEEPER
EDUCATION / ADVOCACY / RESTORATION / ENFORCEMENT

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October 5, 2010

Christina Snow, Compliance Office
California Energy Commission
1516 9th St, MS-2000
Sacramento, CA 95814

DOCKET
00-AFC-13C

DATE OCT 05 2010

RECD. OCT 18 2010

RE: Huntington Beach Generating Station Retool Project (00-AFC-13C) Staff Analysis of Proposed License Extension

Dear Ms. Snow,

Orange County Coastkeeper (“Coastkeeper”) is an environmental organization with the mission to preserve, protect and restore the watersheds and coastal environment of Orange County. After careful review of the California Energy Commission staff analysis concerning the Proposed License Extension for AES Huntington Beach, LLC (“AES”), Coastkeeper submits these comments and strongly encourages strict enforcement of the new license extension deadlines.

In order to plan, permit, finance and construct replacement units for the entire power plant, AES requested to extend its license for Units 3 and 4 of the Huntington Beach Generation Station Retool Project from September 30, 2011 to December 31, 2020, an additional 10 years. The California Energy Commission in turn requested that AES submit their repowering approach 18 months earlier than originally proposed and if the data was adequate under Title 20, California Code of Regulations §1704(c), then the license would be extended by an additional ten years. Coastkeeper agrees that if the repowering approach is not submitted by the hard deadline of 18 months earlier than originally proposed, AES must submit a closure plan and terminate operation of Units 3 and 4 by the original termination date of September 30, 2016.

Once-through-cooling (“OTC”) systems used at coastal power plant like AES’ take approximately one billion gallons of water a day from the ocean. Even with filters, this massive intake of ocean water kills marine life that gets sucked and trapped into the cooling system. Once the water is used to cool down the power plant, it is discharged back into the ocean. This water is sometimes twenty five degrees warmer than before it went into the power plant’s cooling system. When it is discharged back into the ocean, it kills marine life accustomed to cooler temperatures.

The state of California has already mandated that this harmful technology be phased out and Coastkeeper encourages that it be phased out at the earliest opportunity therefore further extensions of AES’ license should not be granted. It is true that even if the license were to be extended until December 31, 2020, this would be consistent with the State Water

Resources Control Board policy of phasing out OTC facilities throughout the state by the end of 2020. However, OTC has significant impacts on the aquatic environment so strict compliance with the December 2020 deadline for termination of OTC is crucial in eliminating such an adverse practice. Furthermore, Coastkeeper feels that it is imperative for AES to continue funding restoration, maintenance and monitoring activities of the 66.8 acres of wetlands in order to continue mitigating the impacts from the OTC system for Units 3 and 4.

Coastkeeper would like to thank you for the opportunity to comment on the Proposed License Extension. The quality of our state's waters is of critical importance to Coastkeeper and we look forward to AES' compliance with the applicable laws, ordinances, regulations and standards for biological resources.

Sincerely,

Garry Brown
Executive Director
Orange County Coastkeeper