

## DOCKETED

<b>Docket Number:</b>	11-AFC-03
<b>Project Title:</b>	Cogentrix Quail Brush Generation Project
<b>TN #:</b>	202182
<b>Document Title:</b>	Quail bush objection motions
<b>Description:</b>	MOTION TO DENY APPLICATION OBJECTION TO SUSPENSION MOTION FOR HEARING IN AFFECTED COMMUNITY INVITATION TO OTHER INTERVENORS TO JOIN POSITION
<b>Filer:</b>	Robert Simpson
<b>Organization:</b>	Helping Hand Tools (2HT)
<b>Submitter Role:</b>	Intervenor
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STATE OF CALIFORNIA  
State Energy Resources  
Conservation and Development Commission

In the Matter of;

QUAIL BRUSH GENERATION STATION

No. 11-AFC-03

**MOTION TO DENY APPLICATION**

**OBJECTION TO SUSPENSION**

**MOTION FOR HEARING IN AFFECTED COMMUNITY**

**INVITATION TO OTHER INTERVENORS TO JOIN POSITION**

The applicant has requested another year suspension of proceedings. The Commission indicated that; Pursuant to Title 20 Cal. Code. Regs. § 1716.5, parties shall submit any written responses they wish to make to the Applicant's Request for an Additional One-Year Suspension on or before April 23, 2014"

The applicant has cited no authority for a suspension as none exists. They have cited no basis for another suspension that would not be served by a new application. There are reasons that the law requires specific time periods for consideration of environmental matters. The environment changes. The application is now stale. The application was never deemed complete. There is no information in the antiquated application worthy of the Commission's consideration. Laws have changed. There is no way to piece the application together that would not be much more complicated than a new application. The public deserves a timely record to review. It is too onerous for the public to try and participate in this long of a

process. Those most affected by the project may not have even been born when the project was first proposed. California has demonstrated that they have no need for this type of facility. Even when the application was new, early in this decade, the proposal to line up a bunch of Eastern European simple cycle reciprocating ship engines instead of a modern combined cycle turbine represented a throwback to a bygone era. They would emit more particulate matter than turbines that produce 5 times the electricity. There is no way that the present application can demonstrate BACT for any pollutant. No facility should be developed in such an environmentally sensitive location. The application hangs over the community like the Sword of Damocles. It negatively affects property values and quality of life. It requires considerable attention from community members. The Commission and community would be better served by considering preferred resources in appropriate locations. The active application could have a chilling effect on the market for renewable resources. The Commission should send a clear message to industry to not waste its time and resources and to complete their business with the commission in a timely fashion. For these and the reasons contained in the Joint Interveners Preserve Wild Santee and Center for Biological Diversity Memorandum and public comments the suspension and application should be denied.

The Commission should hold a hearing regarding this matter in the affected community. There has been a large amount of community interest in this project and the public deserves the opportunity to participate. It will use less energy for the commission to travel to the public than for the public to travel to the Commission.

Interveners are welcome to join this position by simply submitting a statement to the Commission that indicates I/we join the motions and objection of Rob Simpson Helping Hand Tools. Interveners should understand that as parties the Commission has invited objections or motions and should consider your submissions.

Rob Simpson

Executive Director

Helping Hand Tools (2HT)