

DOCKETED

Docket Number:	12-AFC-02
Project Title:	Huntington Beach Energy Project
TN #:	202667
Document Title:	Prehearing Conference Statement
Description:	N/A
Filer:	Monica Rudman
Organization:	Monica Rudman
Submitter Role:	Public
Submission Date:	7/6/2014 10:22:03 PM
Docketed Date:	7/7/2014

**In a Proceeding Before the
STATE OF CALIFORNIA
State Energy Resources
Conservation and Development Commission**

In the Matter of:

Huntington Beach Energy Project

DOCKET NO. 12-AFC-02

**PREHEARING CONFERENCE STATEMENT OF MONICA RUDMAN ON THE
HUNTINGTON BEACH ENERGY PROJECT**

As an intervenor and in accordance with the Siting Committee's direction, I respectfully submit the following prehearing conference statement. While I'm employed at the California Energy Commission as an energy specialist, the views expressed here are my own and do not represent the views of the Energy Commission.

Issues That Are Complete (analyzed) And Ready For Evidentiary Hearing

Parties agree:

- 1) Air Quality. All Huntington Beach Energy Project (HBEP) emissions of nonattainment criteria pollutants and their precursors (NO_x, VOC, PM₁₀, PM_{2.5}, and SO_x) are considered significant and must be mitigated.
- 2) Greenhouse Gases. HBEP, if operated as fully permitted, will not be in compliance with California's current greenhouse gas emission performance standard of 1,100 pounds of CO₂ per net Megawatt hour with equipment degradation. A revised (lower) standard is pending and HBEP does not meet the lower revised standard.
- 3) Water Resources. Wastewater from the Brookhurst Street treatment plant is available in sufficient quantities to act as a substitute for potable water for industrial and construction purposes.
- 4) Soils and Geology. Numerous earthquake faults are located in the project vicinity. Seismic events may lead to adverse changes in soils. HBEP must be designed and built so that the structures are safe and sound.
- 5) Tsunami. The site is subject to tsunami run up.

Issues That Are Not Complete (analyzed)

More information is needed on the following topics:

- 1) Climate Change. Sea level rise effects on critical supportive facilities (such as gas pipelines) have not been fully assessed. Consistency with state policy to not site critical facilities in areas impacted by climate change is not complete.
- 2) Project Definition. Although clearly requested by the Committee, the project is not fully defined. Written demolition plans and enforceable agreements to construct have not been submitted. The FSA does mention closure plans should be provided but does not make their provision a critical path item for the project approval. Demolishment plans are not mentioned in the FSA. The City of Huntington Beach and the public has been led to expect that units 1-4 will be demolished. Further, the demolition and construction schedule has a direct bearing on the project mitigations so must be specified early in the process.
- 3) Other Compliance Conditions. Enforceable prohibitions against market manipulation and disallowance of “Reliability Must Run” or “Reliability Must Take” contracts is not mentioned by the applicant or in the FSA.
- 4) Impact of Oil Well Fracking. Local oil wells have been and may be in the future stimulated (fracked). The potential for increased, hazardous seismic activity has not been assessed.
- 5) Project Alternatives. The CEQA-equivalent and the Environmentally Preferred alternatives should be developed.

Issues That Remain Disputed

- 1) Air Quality. Parties disagree on the accuracy of the inputs to the air quality impact modeling and of the feasibility of local mitigations of the impacts.
- 2) Greenhouse Gas Significance. HBEP is designed to be flexible and can quickly ramp up and down but parties disagree on whether this renewable integration feature has the impact of reducing GHG impacts to be less than significant.
- 3) Global Warming. Parties do not agree on whether sea level rise and other global warming effects can have adverse consequences on the ability of the project to reliably supply power.

- 4) Visual Impacts. Parties do not agree on the significance of the visual impacts of the project.
- 5) Soils and Geology. Roles and responsibilities regarding compliance with building codes and engineering safety standards are not fully agreed upon.
- 6) Land Use. Compliance with Huntington Beach General Plan is disputed.
- 7) Need for the Project. Staff and applicant make numerous statements asserting that the project is needed, but this is not supported by the CPUCs LTPP decisions.
- 8) Feasibility of using Wastewater. Feasibility of using wastewater from the Brookhurst Street wastewater treatment plant is in dispute.

Witnesses and Subject Areas for Questions

I will serve as a witness for the previously mentioned subjects and would like to ask questions on topics related to my testimony particularly on the greenhouse gases, water resources and adaptation subjects.

Exhibit List

Exhibit Number	CEC TN Number	Description	Topic
4000	202640	Research that finds that air pollution reduces lung development in children.	Public Health
4001	202666	SCAQMD letter describing how missing data and other problems led to a decision to use weather data from John Wayne Airport rather than weather data more representative of the local subclimate.	Air Quality/ Public Health
4002	202657	Photograph taken from the Edison High School parking lot that illustrates the proximity of school children to project and which shows local sub climate weather (still air and low cloud cover) (wrongly labeled "HBGS viewed from neighborhood..." on CEC Docket).	Air Quality/ Public Health
4003	202658	Photograph taken at the intersection Milne and Antiqua streets illustrating: a) the proximity of homes to project and b) weather typical of the local sub climate (wrongly labeled "HBGS plume ..." on CEC Docket).	Air Quality/ Public Health
4004	202656	Family photograph that illustrates the point that the applicant's proposed mitigation to sweep Pacific Coast Highway will not be	Air Quality/ Public Health

		comprehensive enough to remove particulates from areas used by the public (Wrongly labeled “HBGS as seen from Edison High ... “ on CEC Docket).	
4005	202647,202648, 202649, 202650,202651, 202652, 202653	Article that says that HBEP is at risk due to sea level rise. (E-filed in one request but posted separately.)	Global Warming/ Adaptation
4006	202631	Embedded picture taken on Newport Pier which shows how power plant would dominate miles of significant views.	Visual Impacts
4007	202639	A summary of data published in Ocean and Coastal Management that demonstrates that a significant number of people would see HBEP.	Visual Impacts
4008	202666	SCAQMD letter that says that HBEP would exceed Class I significance thresholds for plume and color contrast at Huntington State Beach.	Visual Impacts
4009	202655	Evidence that JP Morgan’s consent is needed to construct or demolish structures on the project site.	Project Definition
4010	202637	Article that describes environmentally preferred alternatives to project, such as demand response, advanced inverters, distributed generation, energy storage and intelligent grid solutions.	Greenhouse Gases and Alternatives
4011	202638	Article that describes feasible and quick to implement low carbon strategies to integrate renewables.	Greenhouse Gases and Alternatives
4012	202659	Photograph of the CEC staff’s No Project Alternative’s plume blowing northeast (wrongly labeled “Family at Beach...” on CEC docket).	Alternatives

Respectfully submitted,

MONICA RUDMAN

/s/ Monica Rudman

By: Monica Rudman

Monica Rudman
20951 Sparkman Lane
Huntington Beach, California 92646
(916) 549-7717
monica_rudman@hotmail.com

Dated July 6, 2014