

**DOCKETED**

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*Comment Received From: Miles Maurino*  
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*Docket Number: 16-AFC-01*

**Petition to Intervene**

*Additional submitted attachment is included below.*

**California Energy Commission**  
**Petition to Intervene**  
**Docket No. 16-AFC-01 (Application for Certification)**

Clean Coalition Petition to Intervene in Stanton Energy Reliability Center Application for Certification

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June 22, 2018

**STATE OF CALIFORNIA**

**Energy Resources  
Conservation and Development Commission**

*Application for Certification for the:*

***STANTON ENERGY RELIABILITY  
CENTER***

Docket No.16-AFC-01

**CLEAN COALITION PETITION TO INTERVENE**

**I. INTRODUCTION**

The Clean Coalition hereby petitions to intervene in the proceeding for the Application for Certification (AFC) of the Stanton Energy Reliability Center.<sup>1</sup>

**II. BACKGROUND OF CLEAN COALITION**

The Clean Coalition is a California-based nonprofit organization whose mission is to accelerate the transition to renewable energy and a modern grid through technical, policy, and project development expertise. The Clean Coalition drives policy innovation to remove barriers to procurement and interconnection of DER—such as local renewables, advanced inverters, demand response, and energy storage—and we establish market mechanisms that realize the full potential of integrating these solutions. The Clean Coalition also collaborates with utilities and

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<sup>1</sup> CEC Rule § 1211.7(a) provides the requirements for a petition to intervene: “Subject to the provisions of specific proceedings, any person may file a petition to intervene. The petition shall set forth the grounds for the intervention, the position and interest of the petitioner in the proceeding, the extent to which the petitioner desires to participate in the proceedings, and the name, address, and telephone number of the petitioner.”

municipalities to create near-term deployment opportunities that prove the technical and financial viability of local renewables and other DER. The Clean Coalition is active in numerous proceedings before the California Public Utilities Commission and in transmission planning at the California Independent System Operator.

### **III. CLEAN COALITION GROUNDS FOR INTERVENTION IN 16-AFC-01**

The Clean Coalition seeks to intervene to provide the Commission with data and arguments on the use of local and distributed energy resources as an alternative to natural gas plants such as the Stanton Energy Center. In particular, the Clean Coalition has provided engineering and economic analyses of suites of local solar, energy storage, and demand response which can be deployed as an alternative approach to the use of natural gas plants. For example, the Clean Coalition provided analyses on the size and relative costs of solar+storage alternatives needed to substitute for the Ellwood refurbishment in Goleta before the Energy Commission and we acted as an expert witness in the Puente Power Project siting application. We would seek to provide similar input on these alternatives to the Commission in this proceeding.

### **IV. POSITION AND INTEREST**

The Clean Coalition is a project of Natural Capitalism Solutions, an environmental non-profit. We advocate for consideration of local renewable energy solutions and the development of both policy and expertise in deploying such solutions. Our interest is in providing the key decision makers with reliable information regarding feasibility and costs of local renewable energy solutions.

### **V. EXPECTED PARTICIPATION IN 16-AFC-01**

The Clean Coalition expects to provide engineering and economic analyses of distributed energy resources alternative such that the Commission might reach a better informed decision in 16-AFC-01. We would provide provide concrete estimates of what DER suites would be adequate to substitute for a facility such as SERC to ensure that distributed energy resources--such as distributed renewables, increased energy storage, demand response, and energy efficiency--are properly considered as an alternative to the Stanton Energy Reliability Center.

We note that currently the alternative generation technologies mentioned in the Final Staff Assessment are limited to “technologies that are optimized for peaking power generation

and that use natural gas readily available from the existing distribution system.”<sup>2</sup> This type of alternatives analysis presents a false choice of potential sources of generation and constitutes an unreasonably limited range of alternatives. The list of alternatives does not provide any list of alternatives that include include wind and solar generation resources, which do not emit carbon emissions, nor do they require millions of gallons of freshwater per year, as SERC does. Although we recognize the Final Staff Assessment is complete, we nevertheless feel the Commission would benefit from information regarding alternatives beyond this limited scope of alternatives.

The Clean Coalition hopes to provide input and data analysis to ensure that distributed energy resources are properly analyzed as a CEQA-adequate alternative to SERC or at minimum to provide the Commission with a better informed decision than would be possible without such information. The Clean Coalition anticipates their participation to include analysis of the proposed project, analysis of the projected load in the West Los Angeles basin, analyze the projected greenhouse gas emissions emitted when SERC is in operation, and the ability of DERs to meet SERC’s project objectives.

Respectfully submitted,

/s/ Miles Maurino

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<sup>2</sup> Application for Certification Vol. 1, Stanton Energy Reliability Center, 16-AFC-01, Section 6.6.1 - “Generation Technology Alternatives” p. 6-11. (Submission Date: October 27, 2016.