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We Do Not Need New Natural Gas Power Plants In Huntington Beach

Dear CEC Commissioners:

Docket No. 12-AFC-02

The last thing the air and shore of Huntington Beach and Greater Los Angeles need is another dirty fossil-fueled generating plant. The people of Southern California ask the Commission to reject the gas-fired Huntington Beach Energy Project (HBEP) and choose cleaner, healthy, modern alternatives instead.

It's clear that our energy needs can be met reliably and affordably by more conservation and efficiency, energy storage and demand response, and by cleaner resources such as solar. California is now at a crossroads. Rather than over-building fossil-fueled power plants, it is time to develop facilities, programs and procedures that support state policy goals, have fewer adverse impacts, and don't saddle ratepayers with costs over decades for the wrong kind of energy. State-preferred renewable resources will create even more jobs than fossil-fueled power plants; many can actually lower energy bills, leaving more money to spend on other goods and services.

In the Huntington Beach area, fast-ramping gas-fired power isn't needed to integrate renewable power into the grid. The feasibility of using preferred resources to integrate renewables into a smooth and reliable electricity supply is well documented. But a CEC Environmental Superior Alternative study hasn't been done to weigh these new possibilities against HBEP. And CPUC confirms fast-ramping gas-fired capacity isn't needed in 2015 in the L.A. Basin -- CPUC hasn't said when it will be. CPUC and CEC have forecast generating capacity there to stay well in excess of mandated reserve margins for many years.

At a time when California is struggling to reduce carbon emissions and a worsening climate, HBEP likely will increase system-wide greenhouse gas emissions, emitting an estimated 7.8 billion pounds of CO₂ each year. Plants being replaced by HBEP have emitted far less carbon than HBEP will. It is premature to claim that HBEP's carbon emissions will be "less than significant" before California puts in place an integrated Federal-mandated state carbon-reduction plan for all power plants.

HBEP's site is risky. Future sea-level rise and especially increased storm surges can threaten this low-lying beach plant and especially its supporting infrastructure. The surge risk hasn't been adequately assessed. Flood damage could knock HBEP from service and require electricity from more expensive sources.

Adding to risk are earthquake faults under Huntington Beach. The city is located over oil fields where wells pose underground dangers that haven't been adequately analyzed. Gas-fired plants shouldn't be located where they can present a risk to public safety.

HBEP would visually blight a scenic beach vista. Despite a lower height than an existing plant and a faux-surfboard screen, it will still dwarf its surroundings and be visible from a great distance. California's Coastal Act requires that the scenic and visual qualities of coastal areas be protected as resources of public importance. In addition, the site is located adjacent to wetlands frequented by endangered species.

Another factor the CEC should analyze is the local climate impact of blowing 1300 MW of hot air into Huntington Beach. No other air-cooled plant this size has ever been placed in an inversion layer micro-climate.

In sum, HBEP is simply not needed to ensure reliable energy supplies. Its drawbacks outweigh any benefits. The CEC needs to evaluate the alternatives, considering how already approved plants plus preferred resources can meet the community's need for baseload power and renewables integration for the future.