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Stop New Natural Gas Plants in Huntington Beach

Huntington Beach and Greater Los Angeles don't need another dirty fossil-fueled generating plant. The people of California ask the Commission to reject the gas-fired Huntington Beach Energy Project (HBEP) and choose cleaner, healthy, modern alternatives instead.

Much more effort must be put into Roof top solar in a place that has so much sun. Every house should be built with some solar panels. Until we do this we need to focus on conservation. Every electric vehicle should come with a grant to help put solar panels on the roof or carport.

Our energy needs can be met reliably and affordably by more conservation and efficiency, cleaner resources such as solar, energy storage and demand response. California is now at a crossroads. STOP over-building fossil-fueled power plants that have multiple adverse impacts and high costs for rate-payers. California should instead 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.

Is fast-ramping gas-fired power in the Huntington Beach Area really 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. Why hasn't a CEC Environmental Superior Alternative study been done to weigh these new possibilities against HBEP? 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.

Thank you for the opportunity to comment. Let's use the sun's energy!