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Filer:	James A Light
Organization:	Building A Better Redondo
Submitter Role:	Intervenor
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Building a Better Redondo
Intervenor
10 Feb 14

Subject: Case 12-AFC-03, AES Alternatives Submission
To: CEC Staff, CEC Commissioners

BBR takes issue with many statements in AES' 6.0 Alternatives submission to the CEC. The following paragraphs are numbered to match the AES section that we are commenting to.

6.4 –BBR takes issue with AES' description of the No Project Alternative. The contract for the current plant ends in 2018. It does not run often now because it is so inefficient and the power is not required for grid reliability. The cost for AES to retrofit the cooling would be cost prohibitive and without addressing plant efficiency it is unrealistic to assume the plant would be cost effective to run. Addressing the plant's current running inefficiencies would add even more cost. If retrofitting the current plant was a viable and cost effective solution, why did AES not propose that as the project. This write up is basically aimed at driving fear into the residents to quell opposition. Retrofitting the current plant is not a viable or realistic alternative.

AES generalizes about replacing an undefined amount of the current OTC generation capacity in the LA Basin. AES neglects to reveal that some but not all of the capacity would have to be replaced based on current projections. Reports from CAISO, the State Coastal Conservancy, and the City of Redondo all show AES Redondo can be retired without impacting grid reliability. AES even commented to one CPUC assessment indicating that not all their generation capacity need be replaced. AES has filed an application to rebuild their Huntington plant. They have submitted a plan to the State Water Resources Control Board to replace their Alamitos plant. These two plants are both closer to the protected need especially with the loss of San Onofre. Thus these two plants can support future power needs more efficiently than a plant at Redondo. And that results in less overall air pollution in the LA Basin.

AES and the CEC should analyze a "no power plant" alternative in which the current plant is permanently retired and the land is repurposed. This alternative meets the objectives of the repower... it completely eliminates the substantive and immitigable negative impacts of the current power plant, without impacting grid reliability. In fact, assuming AES rebuilds its Alamitos and Huntington power plants, the end result is less overall air pollution in the LA Basin. Both these sites also afford more buffer which mitigates much of the impact that would be experienced at the Redondo site. Both sites are located on much larger properties in less densely populated areas. Neither the Alamitos site nor the Huntington Beach site is surrounded so tightly on all sides by incompatible residential, commercial and recreational uses. This is a realistic alternative and it is the desired outcome of the people of Redondo.

6.5 – BBR takes issue AES' characterization of its "strong relationship" to the existing industrial site. The new plant is no longer a coastal dependent use. Thus proximity to the ocean is no longer a concern. AES' assessment treats ignores the land uses surrounding its small property. While the infrastructure is in place for a replacement plant, the site is no longer located in an industrial area. The former buffer between it and land uses that are incompatible with a power plant has been eliminated over time and is getting worse. The power plant zoning is an anomaly tightly surrounded by non-industrial uses. High density residential development is closely located on all four sides of the property. A small boat harbor, gym and coastal bike path all have been built to the west. Hotels and a senior living facility are south of the plant. And recent commercial and residential rezoning are spurring new commercial and residential development to the east in the direction of prevailing winds and to the west and south. The current plant was built on a state landmark, the Old Salt Lake that had geological, cultural, archeological and historical value.

So we challenge the characterization that there is a "strong relationship" to the site. This was a bad place to build a power plant in the first place, and development through the years has made it even worse. The power plant is out of character and is incompatible with all the surrounding zoning and development on all sides. This is further exacerbated by the small, narrow property. To add insult to injury the natural amphitheater topology to the east of the site combined with prevailing onshore winds increases the negative visual, noise and air pollution impacts. This is the wrong place to build a power plant. How any reasonable person characterizes this as a "strong relationship" defies common sense.

As stated before, retiring the AES Redondo plant and replacing AES' Huntington and Alamitos plants is the less impactful solution without adding substantive risk our grid reliability.

BBR requests the CEC to evaluate a "no power plant" alternative as the "no project" alternative, for all the reasons stated previously.