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Excerpt from June 26, 2021 CPUC Decision Replacing DCPP with Wyoming Coal

The attached excerpts from the June 26, 2021 CPUC Decision in R2005003 is an example of bad public policy. The State of California plan to replace emission-free Diablo Canyon Power Plant (DCPP) mostly with emission - laden Wyoming coal - fired generation (hidden behind the California legal euphemism "unspecified imports") would give California ratepayers the worst of both worlds. Ratepayers will pay more for their electricity as PG&E's 2020 FERC Form 1 shows DCPP's total generation cost to be \$32.10 / MWh (or 3.21 cents per KWh.) The cost of Wyoming coal fired generation is rising as the U.S. exports more LNG to Europe after Russia's invasion of Ukraine on February 24, 2022. Furthermore, the owners of the Wyoming coal-fired generation would be entitled to rate recovery for an electricity transmission network from Wyoming to California. In 2021, Warren Buffett revealed that network would cost about \$20 billion by 2030. The significantly increased toxic criteria air pollutants and the massive increase in CO2 emissions would be harmful.

Additional submitted attachment is included below.

ALJ/JF2/avs

Note the reliance on "Shortfall" and "Unspecified Imports" for system reliability if DCPD closes. This is bad public policy.

Date of Issuance 6/30/2021

<https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M389/K603/389603637.PDF> Archived by CGNP 07 06 21. **" Unspecified Imports" appears twice on page 16 of 107. Neither "NEPA" nor "Environmental Impact Statement" appear.**

Decision 21-06-035 June 24, 2021

32 instances of "Diablo." 2 instances of "CGNP" that we filed opening comments and reply comments.

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Continue Electric Integrated Resource Planning and Related Procurement Processes.

Rulemaking 20-05-003

5,000 MW of Unspecified imports will be required in 2025 as the 4,000 MW is based on slow-to-implement in-state Salton Sea geothermal production by a Berkshire Hathaway subsidiary.

DECISION REQUIRING PROCUREMENT TO ADDRESS MID-TERM RELIABILITY (2023-2026)

15 percent instead of 20.7 percent, and also removed project viability discounts on the resource additions to the IRP baseline. For the high-need scenario, approximately 815 MW of additional thermal plant retirements by 2026 were assumed. This was based on an estimate of the portion of the thermal generation fleet that will reach 40 years of operating life by 2026, which is an indication of the risk of plants being retired beyond those already announced. Also, for the high-need scenario, **unspecified imports** were reduced from 5 GW to 4 GW. Finally, the PRM was effectively increased further to reflect an assumed effect of a one-degree Celsius temperature increase due to climate impacts over the next decade, with the impacts of the changed assumption applied beginning in 2024.

Table 1 below shows the key metrics and NQC need outputs for each scenario.

**Table 1. Assumptions and Outputs of Need Scenarios Analyzed
(NQC MW unless otherwise specified)**

Item	Mid Need	Low Need	High Need
Assumptions (by 2026)			
PRM	20.7%	14.9%	22.5%
Operating Reserves (subset of PRM)	6%	4.5%	6%
Unspecified imports	5,000	5,000	4,000
OTC unit retirements	3,733	3,733	3,733
Diablo Canyon retirement	2,280	2,280	2,280
Additional thermal retirements	479	479	1,294
Outputs			
2024 NQC shortfall	4,146	1,520	6,571
2025 NQC shortfall (cumulative)	7,097	4,424	9,892
2026 NQC shortfall (cumulative)	7,410	4,715	10,432