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on Diablo Canyon Power Plant

Additional submitted attachment is included below.

Diablo Canyon should be permitted to operate beyond its 2025 planned closure date. Since the original decommissioning plan, California has experienced record heat waves, global natural gas prices have skyrocketed, and there are significant delays and cost escalations in deploying clean energy. These have all been unforeseen shocks that have upended California's energy paradigm. Some commenters are recommending staying the course and waiting out supply chain issues. Others have suggested that Diablo Canyon's capacity can be readily replaced with Demand Response and Energy Storage. This is simply dismissive of the real issues and gives no credit to the value that Diablo Canyon can and does provide today. California should keep Diablo Power Plant operating, including if necessary, extending once-through cooling waivers as it has done for several natural gas power plants to date¹.

It is true that Diablo Canyon has operated as a baseload power plant and that there is some competition between nuclear and renewables. There is however a wealth of real-world experience that demonstrates when nuclear power plants are retired, there is a persistent increase in fossil fuel generation to replace it. This was true of SONGS retirement in California and is true of recent retirements in Massachusetts, New York, and Pennsylvania². There is "opportunity cost" of continued operation of Diablo Canyon, but there are even more risks in letting it retire and hoping that supply plan issues work themselves out. There is no empirical evidence of emissions being reduced *because* of a nuclear power plant retirement while there are several instances of emissions increasing to higher dependence on natural gas and other fossil fuels.

Storage, Demand Response, and customer-sited DERs can and provide benefits to the grid and reduce the need for new infrastructure investment. However, electric vehicles, water heaters, and battery storage consume energy, not all of which is reducing renewable curtailment. Demand Response is designed to reduce peak load on a few days a year, not to meet energy production needs. Diablo Canyon produces 2.2 GW of energy that is still valuable for much of the year. Better management of customer devices can flatten overall load curves to better fit the shape of generation profiles and increase the value of both nuclear energy and renewables. Nuclear has produced energy reliably in California, including during 2020 heat waves while several natural gas plants faltered.

Even if California was on track to meet its GHG emissions goals with the retirement of Diablo Canyon, recent events have called into question the viability of renewable deployment goals, not to mention the cost of coming up short. Natural gas prices in Europe are causing power prices to skyrocket and there is no guarantee that global conflicts will be resolved in the next three years. Neither is there a guarantee that China will be a reliable partner or that manufacturing supply chains outside of China will take up the slack necessary to meet all of the renewable investment goals in the US. With the passage of the Inflation Reduction Act extending renewable subsidies, there will be stiff competition for deploying new renewables even in states without California's emissions targets. Replacing all of the energy that is currently

¹ ['Old clunkers': California power plants break down during heat wave - POLITICO](#)

² [3 states with shuttered nuclear plants see emissions rise - E&E News \(eenews.net\)](#)

generated could cost \$10 billion, more than the state is contemplating loaning to PG&E even absent federal assistance.

In addition to the environmental, security, and economic cases for continuing operation of Diablo Canyon, there is strong public support despite the outcry of some organizations. Nowhere is support for nuclear power stronger than the backyard of Diablo Canyon itself. San Luis Obispo County residents were by far the most supportive of keeping Diablo Canyon open, with more than 59% strongly in favor³. Anti-nuclear activists are imposing their beliefs on nuclear power in *other people's* backyard when in fact, locals are quite supportive of keeping Diablo operating and not simply having the county be paid off for lost jobs and revenue. The environmental risks are manageable and the energy security benefits are real. Japan is continuing to restart nuclear power plants, and even Germany is considering delaying its long-planned closures. These decisions have not been taken lightly in countries with deep skepticism of nuclear power and real disasters. We cannot afford to further increase dependence on natural gas, even in the short term.

³ [POLL: Strong local and statewide support for Diablo Canyon Nuclear Power Plant \(prnewswire.com\)](https://www.prnewswire.com/news-releases/poll-strong-local-and-statewide-support-for-diablo-canyon-nuclear-power-plant-301484881.html)