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Retire Diablo Canyon

Additional submitted attachment is included below.

Comments of Robert Sarvey on Diablo Canyon Power Plant Retention.

On August 11, 2016 PG&E filed application number A16-08-006 at the CPUC for, “Approval of the Retirement of Diablo Canyon Power Plant.” PG&E testified in the proceeding that the Diablo Power Plant was no longer a good resource for California’s energy mix. PG&E’s reasons they proposed retirement of the plant were:

- 1) “California electric system will need more flexible resources to integrate renewable energy and has less need for baseload electricity resources. PG&E’s need for baseload power from Diablo Canyon will decrease after 2025.”¹
- 2) “PG&E is addressing the challenge of renewable resource overgeneration conditions caused by excess renewable energy supply in certain times of the day. As more solar generation comes on line over time, and when its output is at peak supply (e.g., in the middle of the day), there is less room on the electric system for energy from inflexible and large baseload resources such as Diablo Canyon.”²
- 3) “due to expected overgeneration throughout parts of the year, Diablo Canyon may contribute to higher system costs as its current generation profile and lack of dispatchability cause challenges for efficiently integrating renewable resources. Therefore, without Diablo Canyon, the cost to integrate renewables may be lower.”³
- 4) “the cost to operate Diablo Canyon may significantly increase. Future operating costs are uncertain due to a variety of regulatory and other factors and could

¹ Application of Pacific Gas and Electric Company for Approval of the Retirement of Diablo Canyon Power Plant, Implementation of the Joint Proposal, And Recovery of Associated Costs Through Proposed Ratemaking Mechanisms Page 5 <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M166/K001/166001245.PDF>

² Application of Pacific Gas and Electric Company for Approval of the Retirement of Diablo Canyon Power Plant, Implementation of the Joint Proposal, And Recovery of Associated Costs Through Proposed Ratemaking Mechanisms Page 5 <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M166/K001/166001245.PDF>

³ Application of Pacific Gas and Electric Company for Approval of the Retirement of Diablo Canyon Power Plant, Implementation of the Joint Proposal, And Recovery of Associated Costs Through Proposed Ratemaking Mechanisms Page 5 <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M166/K001/166001245.PDF>

increase as the facility ages. Compliance with California’s environmental protection regulations and other state and federal requirements may increase costs beyond 2025. These include, for example, any environmental mitigation or compliance measures required by California resource agencies, retrofits to comply with the State Water Resources Control Board’s (“SWRCB”) Once-Through Cooling (“OTC”) regulation, or additional regulations or orders from the NRC in response to federal regulatory or legislative changes either currently under consideration or in the future.”⁴

The CPUC agreed with PG&E that Diablo Canyon should be retired by 2025 and issued Decision 18-01-022 on January 11, 2018. Now the State is considering extending the operating life of the Diablo Canyon Power Plant even though according to PG&E California needs a more flexible resource than Diablo to integrate renewables. PG&E testified in its application that Diablo Canyon is crowding out renewable resources and making their integration more costly and yet the State still is considering extending its operation. PG&E wanted to retire the power plant because it is uneconomical to continue its operations. **Continuing to finance the operation of Diablo Canyon diverts the money California needs to modernize its grid with fast ramping resources which can solve the reliability issues we face.**

⁴ Application of Pacific Gas and Electric Company for Approval of the Retirement of Diablo Canyon Power Plant, Implementation of the Joint Proposal, And Recovery of Associated Costs Through Proposed Ratemaking Mechanisms Page 5 <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M166/K001/166001245.PDF>