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*Comment Received From: Jim Lutz  
Submitted On: 8/19/2022  
Docket Number: 21-ESR-01*

**Diablo Canyon Power Plant (DCPP) Decommissioning Should Not Be Delayed or Diverted**

*Additional submitted attachment is included below.*

# Diablo Canyon Power Plant (DCPP) Decommissioning Should Not Be Delayed or Diverted

## Re: Joint-Agency Workshop - Diablo Canyon Power Plant, August 12, 2022

Diablo Canyon Power Plant should have no role in supporting mid-term electric reliability and California's clean energy transition.

The governor's proposed extension of DCPP operations seems to be an attempt to attract national attention and gather support for his presidential aspirations rather than rational attempt to solve California's electricity cost and reliability problems.

The rolling blackouts during August 2020 were because California Independent System Operator (CAISO) was exporting at 4 MW of electricity out of state at that time. The apparent lack of reliability is the result of a lapse in the control and oversight mechanisms that had been in place since the Enron scandal two decades ago. The blackouts were not caused by the rapid adoption of renewable generation. None of the municipal utilities in California or electricity providers in neighboring states had any blackouts during that August. It was a case of CAISO going along with market gaming and not enforcing oversight of the operations and maintenance of in-state fossil fuel generation resources.<sup>1</sup>

The Stanford/MIT<sup>2</sup> study cited by some supporters as justification to keep DCPP running focuses on desalination and hydrogen generation, not primarily grid reliability. The transition to desalination and hydrogen generation would be too expensive and slow to be useful. Water policy in California is much better addressed by water experts such as the Pacific Institute.<sup>3</sup>

The Brattle Group study, also cited by supporters of extending DCPP operations, is based on the Stanford/MIT study and assumes no need to address habitat impacts related to its water intake.<sup>4</sup>

The Stanford/MIT study was supported by the international nuclear power industry primarily as an attempt to revive a faltering technology. The funders of the Brattle Group study do not reveal their identity.

Extending power production at DCPP will contribute to the following problems:

1. Divert funding necessary to continue the rapid state-wide ramp up of solar and storage.
2. Unnecessarily restrict transmission access by planned off-shore wind generation. The off-shore wind facility planned for operation off of Morro Bay will need access to the

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1 Bill Julian, *CAISO Market Trading Policies & Computer Programs Allowed Over 3,000+ MW of Exports During Hot Weather & System Stress in What CAISO didn't tell you about the August 2020 blackouts*, [https://clean-coalition.org/wp-content/uploads/2021/01/What-CAISO-didnt-tell-you-about-the-August-blackouts-02\\_rf-28-Jan-2021.pdf](https://clean-coalition.org/wp-content/uploads/2021/01/What-CAISO-didnt-tell-you-about-the-August-blackouts-02_rf-28-Jan-2021.pdf)

2 Justin Aborn, Ejeong Baik, Sally Benson, Andrew T. Bouma, Jacopo Buongiorno, John H. Lienhard V, John Parsons, and Quantum J. Wei. "An Assessment of the Diablo Canyon Nuclear Plant for Zero-Carbon Electricity, Desalination, and Hydrogen Production." Stanford University and the Massachusetts Institute of Technology, November 2021. [https://energy.stanford.edu/sites/g/files/sbiybj9971/f/diablocanyonnuclearplant\\_report\\_11.19.21.pdf](https://energy.stanford.edu/sites/g/files/sbiybj9971/f/diablocanyonnuclearplant_report_11.19.21.pdf).

3 Pacific Institute, *Contributing to California Water Policy*, <https://pacinst.org/california-water-policy/>

4 Sam Newell, Wonjun Chang, Ragini Sreenath, and Dean Murphy. "Retaining Diablo Canyon: Economic, Carbon, and Reliability Implications." Brattle Group prepared for Carbon Free California, June 9, 2022. [https://carbonfreeca.org/wp-content/uploads/2022/06/2022-06-09\\_Brattle-Report-on-Impacts-of-Diablo-Extension.pdf](https://carbonfreeca.org/wp-content/uploads/2022/06/2022-06-09_Brattle-Report-on-Impacts-of-Diablo-Extension.pdf).

transmissions lines currently serving the DCPD. The wind farm has been approved by the Biden administration and the California Coastal Commission.<sup>5</sup>

3. Divert attention from the California Public Utility Commissions rulingmakings (microgrid docket (R.19-09-009) and emergency reliability docket (R.20-11-033) that are stonewalling microgrid adoption.<sup>6</sup>
4. Needlessly derail and scramble the decommissioning planning and efforts currently underway, making it more difficult to safely and equitably retire DCPD without additional environmental and social damage.

I would like to note, but not duplicate, the concerns about the safety, environmental and liability risks breaching the prior DCPD decommissioning agreements entered into by the California Public Utility Commission and Legislation. I urge you to carefully review the evidence submitted by those other commenters.

Finally I urge you to support the yak tit<sup>v</sup>u tit<sup>v</sup>u yak tilhini (YTT) Northern Chumash request to reclaim as much land from DCPD property as feasible as part of a restorative and environmental justice process that has already been delayed too long in California.<sup>7</sup>

For these reasons, I strongly urge you not to delay the DCPD decommissioning process.

Sincerely,  
Jim Lutz

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5 *Wind farms off of Morro Bay approved by Biden Administration*, May 26, 2021, <https://calcoastnews.com/2021/05/wind-farms-off-of-morro-bay-approved-by-biden-administration/>  
*Coastal Commission signs off on Morro Bay offshore wind farms*, June 13, 2022, <https://calcoastnews.com/2022/06/coastal-commission-signs-off-on-morro-bay-offshore-wind-farms/>

6 Allie Detrio, *Comments of the Microgrid Resources Coalition on 5/23 Reliability Workshop*, Microgrid Resources Coalition, file:///home/jiml/Downloads/TN243323\_20220526T181329\_Microgrid%20Resources%20Coalition%20Comments%20on%20Reliability%20Workshop-1.pdf

7 *YTT Northern Chumash ask Governor Newsom to support reclaiming Diablo Canyon land from PG&E*, August 17, 2022, <https://www.kcbx.org/culture-and-identity/2022-08-17/ytt-northern-chumash-ask-governor-newsom-to-support-reclaiming-diablo-canyon-land-from-pg-e>