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Comments of Reliability RFI

Additional submitted attachment is included below.

Please note the responses below to the Commission's RFI

1) Are the categories (indicated in Tables 1, 2 and 3) appropriately representing how the CEC should be evaluating resources?

2) Are there resources that should be added to or removed from the preliminary list under each of the categories (shown in Tables 1, 2, and 3)?

I believe the CEC should include nuclear energy either as it's own category or a sub category under imports. In terms of out of state nuclear nothing under California law prohibits purchasing out of state nuclear power and in particular SB846 earlier this year specifically includes new advanced nuclear energy projects as qualifying zero carbon emission resources. As such I believe out of state nuclear at a minimum should be specifically included as part of the RFI scoping process.

In terms of in-state nuclear I believe that the CEC needs to evaluate the current state of play regarding the requirements imposed on the CEC under state law (both technical and regulatory) to allow for the siting of new nuclear facilities within in the State of California. On the technical side there has been significant progress on meeting some of the requirements under current state law regarding Deep Geologic Storage and Spent Fuel Recycle and I believe it is timely for the CEC to report on these developments to the legislature other through this RFI process or through the IEPR.

Lastly, I believe Large Hydro above 30 MW should also be considered as part of the RFI.

Thank You

Tim Smyth