

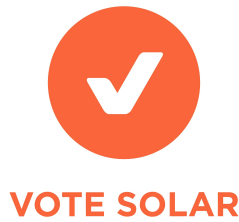
DOCKETED

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*Comment Received From: Lucia Marquez
Submitted On: 8/8/2023
Docket Number: 23-BUSMTG-01*

Community Organization Opposed to OTC Extensions Letter

Additional submitted attachment is included below.



350
sacramento



NAPA CLIMATE NOW!
A 350 Bay Area Group

San Joaquin Valley

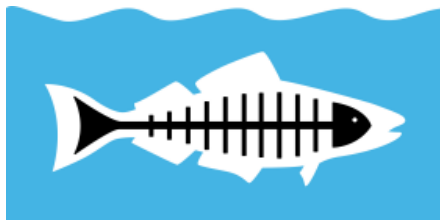


Democratic Club



Sustainable Claremont
Working for Environmental
Economic and Social Sustainability





Heal the Bay



LONG BEACH ALLIANCE
FOR CLEAN ENERGY



Healthy People



Healthy Planet

Climate 911



**extinction
rebellion**
SF BAY AREA



August 8, 2023

David Hochschild, Chair
California Energy Commission
715 P Street
Sacramento, CA 95814

Sent via email

To the California Energy Commission:

We are writing to ask you to reject the proposal for the California Department of Water Resources (DWR) to contract with once-through cooling plants at Ormond Beach, AES Alamitos, and Huntington Beach (the “OTC gas plants”) for another three years. California taxpayers cannot afford to spend over a billion dollars keeping these obsolete fossil fuel plants online. A recent study [commissioned by Regenerate California](#) found that not only did these gas plants not deliver the power expected during the heatwave of summer 2022, but their toxic emissions actually compounded already degraded air quality in the communities they were supposed to serve. Instead of keeping the OTC gas plants online, we ask you to invest in clean alternatives including distributed and community solar and storage, zero-emission microgrids, demand response, and energy efficiency as a priority. Additionally, better-designed rates and

stronger incentives to shift load away from peak demand times are clean, cheap, and common-sense alternatives to gas peaker plants. Our state cannot continue to depend on these malfunctioning and dangerous plants that pollute frontline communities.

Faced with keeping online OTC gas plants, which are devastating for marine life and adjacent communities, California needs to prioritize clean alternatives. Clean alternatives are especially important given the prior commitment to finally retire these gas plants at the end of this year. The Ormond Beach Generating Station is located in the most densely populated community of color in Ventura County and the people who live there experience more pollution than 94% of Californians. Ormond Beach was originally scheduled to retire in 2020, but was kept online for three more years to support grid reliability for the rest of the state. Despite the fact that its units failed to deliver all the promised power when we needed it, and in the process released health-harming emissions 13 times worse than normal during last year's heatwave, the California Energy Commission (CEC) is considering sacrificing the health and safety of Oxnard residents and extending the contract for an additional three years. This extension will put the lives of Oxnard residents at risk.

These extensions will not only continue to harm marine life and our marine ecosystem, but the air pollution that these OTC gas plants emit means more asthma, cancer, and heart disease for California residents. Senate Bill 887 mandates state agencies to develop zero-carbon resources that substantially reduce our reliance on "non-preferred resources" like gas plants in local capacity areas, recognizing the reduction of gas generation in environmental justice communities as a priority.¹ The CEC must not force our communities to sacrifice their health and the health of their families.

The CEC and DWR previously stated that OTC gas plant extensions were necessary to meet summer reliability in the case of an extreme weather event. The Regenerate California heat wave study found that not only did OTC gas plants face high curtailments throughout the ten days of the 2022 summer heatwave, their greatest curtailments coincided with high demand periods. Rather than funding these dangerous, unreliable OTC plants, the CEC should invest further in the clean energy alternatives previously mentioned.

We cannot continue sacrificing the environmental justice communities located near the Ormond Beach and Alamitos gas plants. We do not support using \$1.2 billion of the Strategic Reliability Reserve to upgrade the three OTC gas plants.

Our climate and communities can not wait any longer. Reject the plan to extend the OTC gas plants, plan for the original timeline of retirement by December 31, 2023, and commit to an orderly retirement of all toxic, polluting gas plants in communities that deserve environmental justice.

From,
Lucas Zucker & Hazel Davalos, Co Executive Directors

¹ Public Utilities Code § 454.57(e)

Central Coast Alliance United for a Sustainable Economy

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California State Water Board Members
Alice Reynolds, California Public Utilities Commission
Elliot Mainzer, California Independent System Operator
Delphine Hou, California Department of Water Resources
Senate Pro Tem Toni Atkins
Assembly Speaker Robert Rivas