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TURN comments on Draft Diablo Canyon Power Plant Extension Cost Comparison Report

Please see attached document for comments by The Utility Reform Network on the Draft Diablo Canyon Power Plant Extension Cost Comparison, Comparison of Alternative Portfolio of Resources Consistent with Greenhouse Gas Reduction Goals

Additional submitted attachment is included below.

BEFORE THE CALIFORNIA ENERGY COMMISSION

IN THE MATTER OF Diablo Canyon Power Plant Extension Cost Comparison	Docket 21-ESR-01

COMMENTS OF THE UTILITY REFORM NETWORK ON THE SENATE BILL 846 DIABLO CANYON EXTENSION COST COMPARISON DRAFT REPORT

TURN
THE UTILITY REFORM NETWORK
Lower bills. Livable planet.

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COMMENTS OF THE UTILITY REFORM NETWORK ON THE SENATE BILL 846 DIABLO CANYON EXTENSION COST COMPARISON DRAFT REPORT

Pursuant to the September 26 Notice of Availability in Docket 21-ESR-01, The Utility Reform Network (TURN) hereby submits these comments on the draft Senate Bill 846 Diablo Canyon Extension Cost Comparison Draft Report. TURN urges the Energy Commission to remedy several fatal defects that render the draft report unreliable, incomplete and unusable for its intended purpose. First, the draft report omits significant cost categories attributable to Diablo Canyon extended operations that PG&E has forecasted and intends to collect from customers through 2030. Second, the draft report arbitrarily excludes most viable alternative zero carbon resources from the evaluation and thereby prevents a comparison of relevant alternatives. In addition to fixing these defects, the report should include critical clarifications with respect to the scope and purpose of the cost comparison.

I. THE FINAL REPORT SHOULD CLARIFY THAT IT CANNOT BE USED TO MAKE ANY DETERMINATIONS REGARDING THE COST-EFFECTIVENESS OF DIABLO CANYON EXTENDED OPERATIONS

In briefs recently submitted at the California Public Utilities Commission (CPUC), PG&E claims that the CEC report, once finalized, will constrain the CPUC's ability to independently evaluate the cost-effectiveness or prudence of extended operations. PG&E argues that "SB 846 clearly intends for the CEC's cost-effectiveness analysis to be the primary analysis used to assess the cost-effectiveness of DCPP's extended operations."[1] PG&E additionally states that SB 846 "assigns performance of the cost-effectiveness and prudence review of Diablo Canyon's extended operations to the California Energy Commission" and asserts that positions of any party with respect to cost-effectiveness "should only be reviewed and considered in the context of the CEC's

[1] PG&E reply brief, R.23-01-007, September 29, 2023, page 3.

cost effectiveness analysis."[2] These claims are not supported by statute and do not accurately characterize the contents, or purpose, of the report.

The Energy Commission should recognize that nothing in SB 846 requires the CPUC to rely on this report for purposes of making any determinations under its authority. There is no reference to the CEC cost comparison study in any section of SB 846 that relates to actions to be performed by the Commission. The only identified recipient of the CEC study pursuant to SB 846 is "the public."[3] Moreover, SB 846 grants the Commission clear authority pursuant to Public Resources Code §25548.3(c)(5)(C) to reach findings with respect to cost-effectiveness and prudence. Neither of these topics are explicitly addressed in the CEC report, a fact that should be highlighted both in the executive summary, in Chapter 3 (Diablo Canyon costs) and in Chapter 4 (Comparison of Alternative Resources to DCPP).

The Energy Commission should amend the report to clarify that it does not include any findings with respect to the "cost effectiveness" or "prudence" of Diablo Canyon extended operations in the near-term or through 2030. The report should also affirm that the CPUC retains clear authority to determine whether extended operations are cost-effective or prudent. TURN recommends the following specific language for inclusion in the final report:

- This report does not reach any findings with respect to the cost-effectiveness or prudence of operating Diablo Canyon until 2030.

- This report does not compare the expected costs and benefits of Diablo Canyon with an alternative portfolio of resources over the 2025-2030 timeframe.

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[2] PG&E reply brief, pages 3-4.

[3] Cal. Pub Resources Code §25233.2(a)((a) By September 30, 2023, the commission shall present a cost comparison of whether extended operations at the Diablo Canyon powerplant compared to a portfolio of other feasible resources available for calendar years 2024 to 2035, inclusive, is consistent with the greenhouse gases emissions reduction goals of Section 454.53 of the Public Utilities Code. As part of this comparison, the commission shall evaluate the alternative resource costs, and shall make all evaluations available to the public within the proceeding docket.")

- A robust analysis of the cost-effectiveness and prudence of Diablo Canyon extended operations should be performed by the California Public Utilities Commission based on updated Diablo Canyon cost recovery requests to be provided by PG&E in 2024 and in subsequent years.

These clarifications are necessary to ensure that the purpose and impact of the report is not misconstrued. SB 846 directs the CEC to "present a cost comparison", "evaluate the alternative resource costs" and "make all evaluations available to the public within the proceeding docket."[4] The draft report makes no findings relating to cost-effectiveness or prudence, instead offering a simple summary of PG&E's initial forecast of Diablo Canyon operating costs through 2030. The draft report does not attempt to compare these costs to the forecasted market value of energy or capacity to be generated by Diablo Canyon or perform any other analysis that is fundamental to finding that a resource is cost-effective. Moreover, the alternative resource portfolio costs are shown as estimated one-time capital expenditures in 2025 rather than showing multi-year costs (as is done for Diablo Canyon) or a levelized cost calculation.[5] There is no attempt to calculate the net market value of the alternative resource portfolio. As a result, the report does not actually provide an apples-to-apples comparison and should explicitly affirm that no such comparison was performed.

II. FORECASTS OF DIABLO CANYON COSTS IGNORE A WIDE ARRAY OF CATEGORIES THAT PG&E HAS ALREADY FORECASTED AND INTENDS TO RECOVER IN RATES

The draft report provides a forecast of Diablo Canyon costs that amounts to a copy-and-paste exercise using values provided in PG&E's application to the US Department of Energy Civil Nuclear Credit program and included in direct testimony in CPUC Rulemaking 23-01-007.[6] The draft report ignores PG&E's rebuttal testimony in the

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[4] Cal. Pub Resources Code §25233.2(a). The "proceeding docket" refers to the CEC docket and does not apply to R.23-01-007.
[5] CEC SB 846 Diablo Canyon Cost Comparison Draft Report, page 25.
[6] PG&E prepared testimony, Ex. PG&E-1, CPUC Rulemaking 23-01-007, May 19, 2023 (https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2301007/6083/509543841.pdf)

CPUC proceeding[7], the specific provisions of SB 846 that identify costs to be recovered in rates, and the analysis provided by TURN. These major omissions render the draft report fundamentally flawed. If the Energy Commission does not remedy this flaw, it should (at a minimum) add language stating that the report did not review PG&E's revised forecasts, any provisions SB 846 that require specific costs to be recovered in rates, or an array of other Diablo-related costs that PG&E has indicated it intends to recover in electricity rates through 2030.

TURN submitted a copy of its testimony from the CPUC proceeding in the Energy Commission docket. This testimony identifies a series of cost categories (and values) that must be included in any effort to quantify the cost of extended operations at Diablo Canyon.[8] In addition, TURN obtained information from PG&E through discovery in the CPUC docket that was used to refine future forecast values.[9] Based on PG&E's rebuttal testimony and data responses, TURN included a revised forecast that relies almost entirely on PG&E's own projections in its opening brief in R.23-01-007.[10]

Based on a comprehensive review of PG&E's own representations and the clear language of SB 846, TURN submits that the costs omitted from the draft report include the following:

- Fixed Management Fee required pursuant to SB 846 (PG&E forecast = $611 million between 2024 and 2030).[11] These amounts are expressly intended to be paid to shareholders as compensation for continued operation of Diablo

[7] PG&E rebuttal testimony, Ex. PG&E-4, CPUC Rulemaking 23-01-007, July 28, 2023 (https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2301007/6511/515314717.pdf)
[8] TURN direct testimony of William Monsen, R.23-01-007, June 30, 2023 (https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2301007/6409/512708454.pdf)
[9] Ex. TURN-3, CPUC Rulemaking 23-01-007, PG&E responses to TURN Data Request #5 (https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2301007/6676/519776741.pdf); Ex. TURN-4, CPUC Rulemaking 23-01-007, PG&E responses to TURN Data Request #6 (https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/R2301007/6676/519776966.pdf)
[10] TURN opening brief on Phase 1 Track 2 issues, R.23-01-007, September 18, 2023 (https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M520/K470/520470966.PDF)
[11] Cal. Pub. Util. Code §712.8(f)(6)(A); Ex. PG&E-4, CPUC Rulemaking 23-01-007, page 1-11, Table 1-3.

Canyon.[12] In addition, PG&E intends to seek rate recovery of both state and federal tax liabilities associated with these payments (along with an additional "gross up") that would add $259.8 million (between 2024 and 2030) to the amounts collected from ratepayers, bringing the total cost to $870.8 million.[13]

• Employee Retention Program required pursuant to SB 846 (PG&E forecast = $338 million between 2024 and 2029).[14] These costs would only be incurred if Diablo Canyon operations are extended past the current retirement dates.

• Various local, state and federal taxes (property, payroll, business, state corporation franchise, federal income). PG&E omitted these taxes from its direct testimony but admitted to the likelihood of such costs in rebuttal testimony and indicated an intent to collect them (with a "gross up") from ratepayers.[15] PG&E provided extremely conservative estimates of certain tax obligations by assuming minimal ongoing liabilities. One example is the assumption that property taxes would fall from $19.4 million in 2023 to $1 million/year beginning in 2026 despite not having received any relevant ruling or determination from the State Board of Equalization.[16]

• Liquidated Damages Account required pursuant to SB 846 (PG&E forecast = $300 million between 2024 and 2026).[17] In the event of outages, these costs could be used to pay for replacement power expenses that would otherwise be the

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[12] Assembly Floor Analysis of SB 846, August 28, 2022, page 1 https://leginfo.legislature.ca.gov/faces/billAnalysisClient.xhtml?bill_id=202120220SB846# ("$100 million paid annually to PG&E shareholders.")
[13] Ex. TURN-4, CPUC Rulemaking 23-01-007, PG&E response to TURN Data Request 6, Q1, Attachment, line 5
[14] Cal. Pub. Util. Code §712.8(f)(2); Ex. PG&E-4, CPUC Rulemaking 23-01-007, page 1-11, Table 1-3.
[15] Ex. PG&E-4, CPUC Rulemaking 23-01-007, page 1-7, Table 1-1; Ex. TURN-4, PG&E response to TURN Data Request 6, Q1(c), Attachment 1, line 5.
[16] Ex. PG&E-4, CPUC Rulemaking 23-01-007, page 1-7, Table 1-1, Line 6; Ex. TURN-3, CPUC Rulemaking 23-01-007, PG&E response to TURN Data Request 5, Q10; Ex. TURN-4, PG&E response to TURN Data Request 6, Q6.
[17] Cal. Pub. Util. Code §712.8(g), (i); Ex. PG&E-4, CPUC Rulemaking 23-01-007, page 1-11, Table 1-3. The total amounts sum all values between 2024 and 2030.

responsibility of PG&E shareholders. If these funds are used to pay for replacement power costs during extended operations, PG&E would seek to collect additional funds from ratepayers to keep the account funded at $300 million. In addition, PG&E expects to incur $127.6 million in state and federal tax liabilities related to these revenues that it proposes to collect in rates.[18] Even if there are no replacement power costs incurred through 2030, ratepayers could be forced to advance PG&E the $300 million account balance and the $127.6 million tax liability and receive only these nominal amounts back at some future date, an outcome that amounts to a zero interest loan to PG&E's shareholders.

• Volumetric Performance-Based Payment required pursuant to SB 846 (PG&E forecast = $1.41 billion between 2024 and 2030).[19] PG&E included a forecast of the revenues associated with this payment in rebuttal testimony and admitted there may be additional associated tax liabilities that PG&E would seek to collect from ratepayers.[20] Future CPUC guidance regarding the use of these funds will determine whether their use will offset costs that would otherwise be collected from ratepayers or insulate PG&E shareholders from liabilities tied to overspending on Diablo Canyon and other items.

• Administrative and General (A&G) costs (TURN forecast = $1.334 billion between 2024-2030).[21] PG&E already requested A&G cost recovery for Diablo Canyon in 2024 and 2025 in its current General Rate Case, does not dispute that there will be continued A&G costs attributable to Diablo Canyon extended

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[18] Ex. TURN-4, PG&E response to TURN Data Request 6, Q1, Q2, Q3, Q6, Q7
[19] Cal. Pub. Util. Code §712.8(f)(5); Ex. PG&E-4, page 1-11, Table 1-3. The total amounts sum all values between 2024 and 2030.
[20] Ex. PG&E-4, page 1-11, Table 1-3. The total amounts sum all values between 2024 and 2030; Ex. TURN-4, PG&E response to TURN Data Request 6, Q4.
[21] TURN opening brief, pages 7-8, 16.

operations, and indicated an intent to collect these costs as part of the ratemaking for Diablo Canyon.[22]

• Various costs collected through the General Rate Case including transmission, uncollectibles, and the Franchise and SFGR Requirement (TURN estimate = $19.6 million in 2027).[23] PG&E offers lower estimates for these categories ($5.78 million) but has not adequately explained the basis for the anticipated reduction relative to historic levels.[24]

• Nuclear Property Insurance costs (PG&E forecasts = $0.11 million/year) that were omitted from prior forecasts.[25] PG&E did not provide a basis for this value in its testimony.

• Incremental Decommissioning Planning Costs that are referenced in SB 846 but have not yet been quantified by PG&E.[26]

• The costs relating to the relicensing process at the US Nuclear Regulatory Commission. PG&E forecasts spending $47.8 million in 2024, $19.89 million in 2025 and $5 million in 2026.[27]

The draft report provides a single reference to TURN's identification of these missing cost categories. The report characterizes TURN's work as an "independent analysis" that finds PG&E "has underestimated the costs of extending DCPP operations."[28] However, the draft report does not identify any of the issues raised by TURN, note the magnitude of costs that were omitted by PG&E, or explain whether the critiques are

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[22] Ex. TURN-3, PG&E response to TURN Data Request 5, Q7; Ex. TURN-3, PG&E response to TURN Data Request 5, Q6(a), (b); Ex. TURN-3, PG&E response to TURN Data Request 5, Q6(e).
[23] TURN opening brief, pages 13-15.
[24] Ex. TURN-3, PG&E response to TURN Data Request 5, Q18 Supp, Attachment; TURN opening brief, page 14.
[25] Ex. PG&E-4, pages 1-9 and 1-10.
[26] Ex. PG&E-5, page 1-13.
[27] Ex. PG&E-1, page 13, Table 3.
[28] CEC SB 846 Diablo Canyon Cost Comparison Draft Report, page 14.

reasonable. The absence of any reference to the many missing cost categories identified by TURN undermines the credibility of the draft report and must be remedied in a final version.

The draft report's review of "detailed DCPP Forecast Cost Components" through 2030 relies entirely on the forecast presented in PG&E's initial testimony in R.23-01-007.[29] The draft report merely reprints tables from PG&E's testimony and applies no scrutiny to the values or the categories. Astonishingly, the draft report does not reference PG&E's July 28th rebuttal testimony which acknowledges and incorporates some of the missing cost categories identified by TURN.[30] It is unclear why the draft report fails to reflect the updated forecasts in PG&E's rebuttal testimony that include a number of the cost categories missing from its original forecast. Since PG&E's rebuttal testimony was available almost two months before the release of the draft report, there is no justification for omitting this material.

Even more surprising is the failure of the draft report to include additional cost categories explicitly required by SB 846 for collection in rates. These categories include the fixed management fee, the volumetric performance-based payment, the liquidated damages account, and employee retention.[31] These costs would only be collected in rates if extended operations at Diablo Canyon are authorized. The failure to include these elements in any cost comparison means represents a fatal defect that significantly understates the real-world costs of continued operations.

TURN's opening brief in R.23-01-007 provided a comprehensive accounting of all costs that PG&E has identified an intent to collect from ratepayers for Diablo Canyon extended operations. The following table shows the categories and forecasted values through 2030:

[29] Ex. PG&E-1, CPUC Rulemaking 23-01-007.
[30] Ex. PG&E-4, CPUC Rulemaking 23-01-007, pages 1-1 through 1-15.
[31] Cal. Pub. Util. Code §712.8(f)(2), (f)(5), (f)(6)(A), (g), (i),

Forecast of Diablo Canyon costs (2024-2030) and anticipated net ratepayer obligations[32]

	2024	2025	2026	2027	2028	2029	2030	Total
PG&E forecast (original)	**744,446**	**893,139**	**765,143**	**751,995**	**885,818**	**773,477**	**312,811**	**5,126,829**
Excluded costs	**379,290**	**782,787**	**765,621**	**729,951**	**746,453**	**772,781**	**362,255**	**4,539,138**
Administrative and General	142,557	158,530	171,372	213,272	226,133	262,943	160,000	1,334,807
Employee retention	52,386	53,957	55,576	57,243	58,961	60,729		338,852
DWR Payments ($7/MWh)	115,196	21,878						137,074
Volumetric Payments ($13/MWh)	21,773	149,726	274,749	284,365	280,343	277,444	121,576	1,409,976
Fixed Management Fee ($50 million/unit)	8,658	74,725	114,752	118,769	122,926	116,422	54,657	610,909
State/Federal taxes on Fixed Management Fee (+gross up)	3,682	31,782	48,806	50,514	52,282	49,516	23,246	259,828
Liquidated Damages Account	24,583	205,000	70,417					300,000
State/Federal taxes on Liquidated Damages Account (+gross up)	10,455	87,189	29,949					127,593
Franchise, SFGR Taxes, Property Taxes, Property Insurance, Uncollectibles				5,788	5,808	5,727	2,776	20,099
Excluded costs under existing GRC ratemaking	**650,682**	**463,850**	**24,404**					1,138,936
Taxes	71,174	45,140	24,302					140,616
Uncollectibles	3,637	2,304	87					6,028
Amortization	31,327	19,500						50,827
Depreciation	414,855	333,440						748,295
Shareholder returns	129,689	63,466	15					193,170
Total costs	**1,774,418**	**2,139,776**	**1,555,168**	**1,481,946**	**1,632,271**	**1,546,258**	**675,066**	**10,804,903**
Annual generation (GWh)	18,024	16,172	18,418	18,418	17,543	16,775	7,102	
Total costs ($/MWh)	98.4	132.3	84.4	80.5	93.0	92.2	95.1	
Potential funding from DWR/DOE	(408,321)	(210,256)	(58,056)	-	-	-	-	(676,633)
Net ratepayer cost	1,366,097	1,929,520	1,497,112	1,481,946	1,632,271	1,546,258	675,066	10,128,270
Net ratepayer cost ($/MWh)	**$ 75.8**	**$ 119.3**	**$ 81.3**	**$ 80.5**	**$ 93.0**	**$ 92.2**	**$ 95.1**	

The draft report limits its analysis to the first line (PG&E forecast (original)) which projects $5.126 billion in costs between 2024 and 2030. Omitted from the forecast are more than $4.5 billion in additional costs relating to Diablo Canyon that may be collected from ratepayers over the same time period. The omission of these additional cost categories, all of which PG&E acknowledges will be included in its proposed revenue requirements, results in a massive underestimation of the costs of extended

32 TURN opening brief, CPUC Rulemaking 23-01-007, page 16 (footnote 59 identifies the source of data for every line item in this table).

operations. It is not reasonable or credible to summarize the extended costs of operations without considering these additional cost categories.

Finally, PG&E has already indicated that it is actively developing a different forecast that does not rely on any of the values in its prior forecast and will be submitted to the CPUC in 2024 for purposes of cost recovery and ratemaking. The draft report notes that "these estimates were preliminary and more detailed analysis of costs may be higher" but does not incorporate any sensitivities into the costs evaluated.[33] An appropriate method of incorporating uncertainty would be the application of sensitivities to PG&E's current forecast. It would be reasonable to use PG&E's current forecast as a base case with both high and low sensitivities (for example, +/- 20%) to bound potential outcomes.

In summary, the draft report performs no actual analysis of the costs presented by PG&E in direct testimony, applies no scrutiny to the values for identified categories, omits statutorily-required costs, and ignores several additional cost categories tied to extended operations that PG&E will seek to collect in rates. These infirmities render the results unusable for the stated purpose of serving as a "baseline to compare DCPP extension costs and the mix of alternative resources".[34]

III. THE EXCLUSION OF PRACTICALLY ALL VIABLE ALTERNATIVE RESOURCE OPTIONS IS ARBITRARY AND DESIGNED TO PREVENT ANY MEANINGFUL COMPARISON

The draft report excludes a wide array of cost-competitive and viable clean energy alternatives from consideration as replacement resources for Diablo Canyon. The basis for this exclusion is the belief that California has already committed to maximum deployment of wind, solar, geothermal, compressed air storage, and battery storage (< 8 hours) that can be online by the end of 2025 and that "ordering more of these resources does not mean that they can come online quickly enough to provide the necessary grid

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[33] CEC SB 846 Diablo Canyon Cost Comparison Draft Report, page 14.
[34] CEC SB 846 Diablo Canyon Cost Comparison Draft Report, page 14.

support."[35] This comprehensive exclusion renders the analysis defective and unreliable for the purpose intended by SB 846.

A comparison of alternatives should envision the potential for additional solar, wind and battery storage (at a minimum) to come online by the end of 2025. The draft report does not support the categorical exclusion of these options with any specific evidence but instead relies on the generic observation that projects already under contract with Load Serving Entities are facing delays in meeting their anticipated online dates due to interconnection delays and supply chain issues.[36] The arbitrary exclusion of these resources appears to be designed to achieve the foregone conclusion that there are insufficient new resources, even those that are theoretical in nature, that could possibly satisfy the criteria necessary to conduct a cost comparison. TURN does not agree with this artificial narrowing of the scope of alternative resources that are most likely to be able to cost-effectively replace Diablo Canyon.

The only remaining options contemplated are distributed energy resources that primarily provide demand response and a modest amount of rooftop solar with paired energy storage. The report reaches the conclusion that there are only 725 MW of such resources that could be developed by the end of 2025 but does not demonstrate the modeling inputs and other constraints that applied to the analysis.[37] As a result, the draft report fails to satisfy the statutory requirement that its evaluation be publicly disclosed.[38]

The limited scope of the evaluation in the draft study is puzzling. In assuming that only 200 MW of distributed rooftop solar and storage can be developed by the end of 2025, the draft study appears to ignore the potential contributions from a new community

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35 CEC SB 846 Diablo Canyon Cost Comparison Draft Report, page 8.
36 CEC SB 846 Diablo Canyon Cost Comparison Draft Report, page 8.
37 CEC SB 846 Diablo Canyon Cost Comparison Draft Report, page 23.
38 Cal. Pub. Resources Code §25233.2(a)("As part of this comparison, the commission shall evaluate the alternative resource costs, and shall make all evaluations available to the public within the proceeding docket.")

renewable energy program consistent the parameters in AB 2316 (Ward, 2022). The commission is currently evaluating the proposed Net Value Billing Tariff in A.22-05-022 supported by a variety of parties (including TURN). In that docket, the Coalition for Community Solar Access (CCSA) presented analysis on the potential for rapid deployment of community solar and storage projects connected to the distribution system. Under CCSA's proposal, each project would be required to include 1 MW of 4-hour energy storage for every MW of solar capacity. CCSA found over 9,200 MW of hosting capacity at Southern California Edison substations that can interconnect 10 MW of more of new generation with the potential to install at least 1 GW without significant interconnection upgrades.[39]

Had the CCSA analysis extended its evaluation to other IOU service territories, the estimated capacity would have been significantly larger. CCSA noted that assuming an indicative market ramp rate consistent with community solar programs in Minnesota or Maine would result in between 2,890 MW and 3,428 MW of new capacity after the second year of program operation.[40] This analysis, which was provided to the CEC in this docket (21-ESR-01), found that new projects can be expected to be online no later than a year after receiving permits and an executed interconnection agreement.[41] The omission of any contribution by community renewable energy projects represents just one example of the arbitrarily limited scope of alternative resources considered by the draft report.

The very narrow evaluation of a subset of replacement resources available to substitute for Diablo Canyon by the end of 2025 renders the draft report's comparison unhelpful and irrelevant. A realistic analysis would consider an expanded set of potential resource

[39] Surrebuttal testimony of Brandon Smithwood for CCSA, CPUC Application 22-05-022, April 28, 2023, pages 72-73

[40] Surrebuttal testimony of Brandon Smithwood for CCSA, CPUC Application A.22-05-022, April 28, 2023, page 71.

[41] Coalition for Community Solar Access RFI Response, CEC Docket 21-ESR-01, submitted November 30, 2022.

options, calculate the actual costs (and benefits) of such resources, and provide an actual comparison of cost-effectiveness relative to Diablo Canyon.

Respectfully submitted,

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