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## **Comments on CEC's SB 846 Diablo Canyon Power Plant Extension Cost Comparison**

Along with its provisions for prolonging Diablo Canyon until 2030, SB 846 required the CEC to release an honest, comprehensive report comparing the costs of the current Diablo Canyon Power Plant to potential zero-carbon alternatives that could replace it. Given the formidable size and complexity of California's power grid, 1,000 pages would not be an unreasonable minimum length to expect for a report whose findings will have such undeniable long-term impacts on California's power reliability. Instead, what the public received was a meager 43-page piece of propaganda that is neither honest nor comprehensive.

First of all, the report weeds out several of the state's most promising renewable energy options including solar, wind, and geothermal merely on the grounds that they compete with IRP procurement orders and will exacerbate a bottleneck effect in the private sector that is preventing the aforementioned renewable energy sources from coming online. What specifically the concerns are for each of the different sources, and what opportunities there could be to file for exemptions from these orders for a situation as urgent as an old, waste-spewing nuclear power plant sitting on the crosshairs of six potentially geologically active fault lines, are not discussed. For the energy sources that made it through CEC's first round of filtering, CEC then denies them the right to serve as Diablo Canyon replacements based on calculations that the CEC calls like-for-like analysis; that is, there are no power plants that currently exist, or that could be built before 2025, that can, alone, generate Diablo Canyon's current capacity of 18,000 GWh per year. However, nowhere in SB 846 is it stipulated that the CEC must subscribe to this like-for-like analysis. Instead, CEC has made up its own policies for how it believes electrical output ought to be counted, then has presented those policies to readers as if they were pre-existing, voter-approved laws. This is not how the democratic process works.

Moreover, in an effort to incite panic amongst its readers about potential blackouts resulting from the closure of Diablo Canyon, the report includes a graph (Figure 2, pg. 5) showing a five-hour period in which energy demanded slightly exceeds energy supplied on the day, September 25, at which electrical use in California is at its zenith. What is left unsaid is that the economic and public health problems created by a five-hour electrical shortage pale in comparison to those that would be created by a possible nuclear meltdown at Diablo Canyon Power Plant in between 2025 and 2030, the probability of which, as experts have said, is dangerously high.

In 2018, legislation was passed for Diablo Canyon to be shuttered in 2025 with the knowledge that new zero-carbon infrastructure would be built in the meantime to replace it. While it is clear that California's electrical usage has increased since then

in ways that the government could not have anticipated, it is difficult to believe CEC's claim that, given all the technological advances that have occurred since, zero-carbon alternatives would not be able to keep up pace. What happened between 2018 and 2023? California residents deserve a clear explanation from their political leaders, no matter what their actual motivations are for keeping Diablo Canyon running.

Had the CEC done its proper research in compliance with SB 846's instructions, I suspect it would have been able to form a long list of environmentally and economically sound alternatives to Diablo Canyon, thus validating the original agreement to close it by 2025. In the absence of such a document, the public has been misled to believe that Diablo Canyon is a vital and irreplaceable part of California's statewide power grid, which it simply is not. In short, I question the credibility of the CEC's most recent cost comparison analysis draft and I urge the CEC and affiliated government agencies to reconsider their plans to postpone Diablo Canyon's long-overdue closure. This is the decision that is in the best interest of public health and one that does not sacrifice California's power reliability from 2025 to 2030.