DOCKETED	
Docket Number:	23-OPT-01
Project Title:	Fountain Wind Project
TN #:	263346
Document Title:	John Gable Comments - Rebuttal to Fountain Wind Developers At CEC May 20, 2025 Meeting
Description:	N/A
Filer:	System
Organization:	John Gable
Submitter Role:	Public
Submission Date:	5/25/2025 5:25:03 PM
Docketed Date:	5/27/2025

Comment Received From: John Gable

Submitted On: 5/25/2025 Docket Number: 23-OPT-01

Rebuttal to Fountain Wind Developers At CEC May 20, 2025 Meeting

Additional submitted attachment is included below.

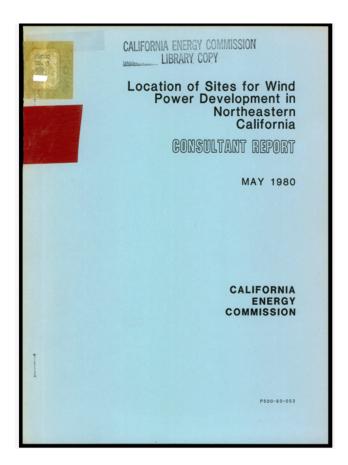
Henry Woltag - "To meet these goals, the Cpuc concluded that California will need to add an additional 12,000 megawatts of wind energy in or near California by 2045. This is the equivalent of 60 fountain wind projects, and this is, in addition to the nearly 100,000 megawatts of clean energy resources that are needed, including out of state wind, offshore, wind solar and energy storage. needs to be sited, permitted, and built, which is in California, a decades-long process."

"We need 60 wind projects of this size, and there are practically 0 waiting in the pipeline in California"

Rebuttal - Henry presents a picture of Fountain Wind as a project that will save and/or jump start the onshore wind industry in California when the industry has languished for years because there are only so many areas in the state with good wind. (see attached chart created with CEC data) Note the chart shows how fast solar is growing in California.

California has already identified the solutions to the need for more wind as a renewable resource and they are offshore wind, out of state wind and additional wind turbines in existing wind development regions, including Tehachapi. According to the California ISO 2024-2025 Transmission Plan we will have the equivalent of 22 Fountain Winds from offshore wind, 44 Fountain Winds from out of state wind and 34 Fountain Winds from existing wind development regions by 2039.

<u>From Staff Assessment 11-9</u> - "The proposed site location is not within one of the previously identified and established wind resources areas and the project's expected capacity factor will be lower than other projects located in the state's traditional wind resources areas. The applicant has indicated that: to the Applicant's knowledge, the Fountain Wind Project is the only greenfield, utility-scale wind energy project currently under review by any permitting entity in California. This is the case not because there is no market for wind energy in the state, but because there are very few available sites suitable for new utility-scale wind energy in California."



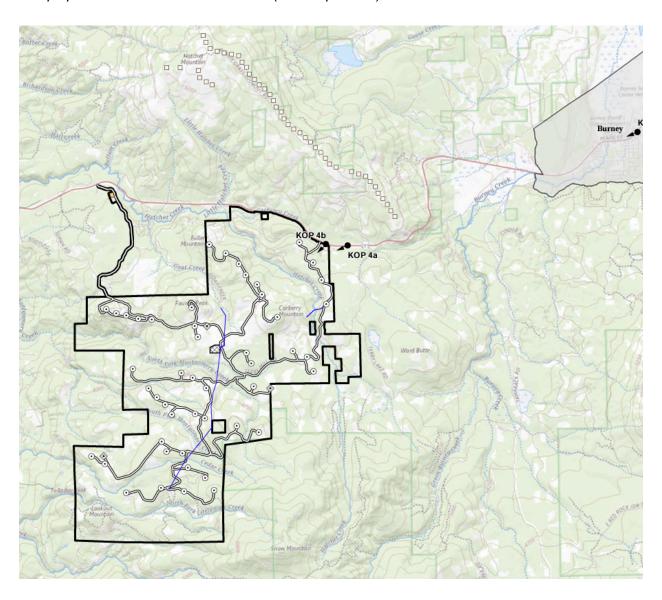
Henry Woltag - "Fountain Wind is effectively a shovel-ready project, and it has been so for the last 4 years. It has the potential to provide power to more than 80,000 homes in the State of California. Which is essentially the same as providing power to the entire city of Redding."

Rebuttal - <u>97 percent of the power produced in Shasta County is renewable energy. Shasta County produces 6 times as much energy as it consumes.</u>

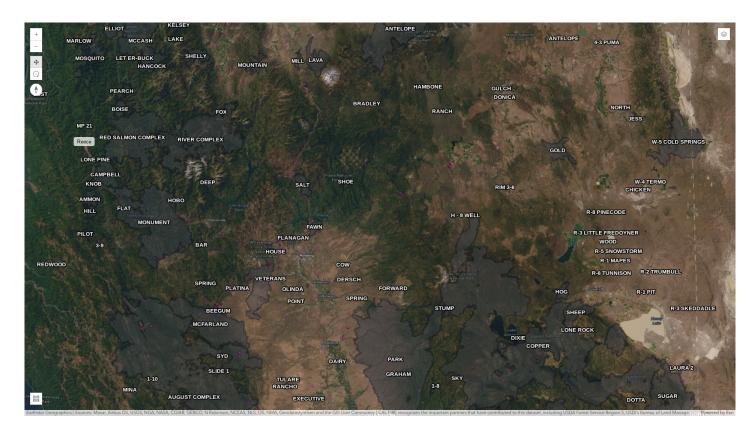
Annie Mudge - "I find the staff assessment to be exaggerated, speculative and not based on good data. It Ignores the history of the hatchet project immediately adjacent, which has successfully operated for the past 15 years."

"The conclusions about fire in this document are almost apocalyptic, that Cal fire is going to be incapable of suppressing and containing fires, because it cannot use aerial firefighting. That's not how Cal fire suppresses and contains fires."

Rebuttal - The Hatchet Ridge turbines are all located on one ridge easily accessible by road and from the air in a way far different from the planned Fountain Wind project which has turbines on every ridge and every mountain top spread over thousands of acres. (see map below)



Since the Hatchet Ridge turbines were installed nine of the ten largest wildfires in California history have occurred. Two of those fires (Dixie & Park) burned in Shasta County and were literally within a windy day of burning through the proposed Fountain Wind acreage. The top 4 most destructive fires in California history have occurred since the Hatchet Ridge turbines were built. Over 40,000 structures burned in just those 4 fires. Wildfire conditions in California have been described as apocalyptic for many years now including the very recent fires in Los Angeles. A map with the Fountain Wind project in the middle displays the many recent fires in the surrounding area. I can't imagine the state of California would not be held liable for wildfire damages - loss of lives and property - if Fountain wind was built and a destructive wildfire roared through the area.



All of the above fire data is from Statistics | CAL FIRE

Shane Lauderdale - "And in my role as a Cal Fire Operations section Chief I traveled the entire State fighting some of the most catastrophic, devastating, deadly fires in California's history, including the Campfire, the Thomas Fire and the Fawn fire right here, and so many more | could go on and on. But my last fire was this year in Malibu in December. So it is from that lens that I'm speaking to you today, a lens that truly believes that we need to make our communities more resilient from fire."

"Let me explain as an example. When Shasta County asked them to specifically evaluate the aerial firefighting impacts they chose to study the use of vlats in fighting fires in Eastern Shasta County for those of you that don't don't know what a Vlat is It's a DC.10. They're impressive. There's 4in the United States. There's 4 in the United States, and they do not belong to Cal fire. They belong to, They're contractors, and they could be on any fire anywhere in the United States when a fire breaks out in Eastern Shasta County. But Instead of modeling the aircraft that Cal fire uses, that sit right here on Shasta on Reddings Air Base, s. 2 s. Which are nimble aircraft made for immediate initial attack, and are extremely effective in the wildland and mountainous terrain of Shasta County and California's fleet of the most advanced firefighting helicopters in the world. They chose DC tens right there. The credibility of that company becomes extremely concerning."

Rebuttal - Mr. Lauderdale suggests in his remarks that the research CEC staff used was faulty concerning aerial firefighting because they studied vlats (very large air tankers) and not smaller planes and helicopters. And yet vlats are commonly used on wildfires in California. In fact all the wildfires Mr. Lauderdale cited in his introduction were contained with the help of vlats. On May 12th of this year a vlat was stationed on standby at Sacramento McClellan airport for the upcoming fire season. Mr. Lauderdale infers that the smaller more nimble aircraft could operate safely among the ridges, mountain tops, wind turbines, weather stations and utility lines of the Fountain Wind project area when the pilots association of these aircraft have testified this is not true.

Mr. Lauderdale's long discussion of shaded fuel breaks ignores the fact that the fuel breaks within Fountain Wind are merely the roads that are already there or will be built. The best placement of fuel breaks was not mentioned by Mr. Lauderdale nor was the fact that CalFire suggested the developer build a completely new fuel break around the perimeter of the whole development.

Solar PV and Wind Generation (GWh)



