

## DOCKETED

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*Comment Received From: D.J. Schaub*

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## **THAT Power Plant**

California Energy Commission  
Chairman Weisenmiller and Commissioners  
1516 Ninth St.  
Sacramento, CA 95814

AES Southland (AES) has filed an application with the California Energy Commission (CEC) to build a new 496-megawatt (MW) power plant on their 50-acre site in Redondo Beach. The existing plant is 50 years old, inefficient and rarely operates. It must be retired by 2020 as agreed to by AES and mandated by the State Water Resources Control Board per new State regulations banning once-through-cooled power plants. For the reasons stated below, I strongly oppose AES' application and the building of a new power plant in this densely populated coastal community.

Attached please find an independent energy analyst report commissioned by the City of Redondo Beach demonstrating that the additional 496 MW of capacity applied for by AES is not required for grid reliability through 2022 - as far into the future that the California Independent System Operator (CAISO) projects capacity needs. This scenario and its conclusions include the recent CAISO data and analysis with the San Onofre Nuclear Generation Station (SONGS) permanently retired.

Secondly, according to the air quality projections in the AES application submitted to the CEC, dangerous air pollutants are going to significantly increase in the South Bay due to the increased run rates outlined. According to the AES application, particulate matter emissions will increase 5-15 times depending on how often the new power plant operates. As you may know, exposure to particulate emissions kills twice as many people every year in California than breast cancer, and is linked to an increase in autism, as well as other adverse health effects. Other criteria pollutants that are out of compliance in the South Coast Air Basin will also significantly increase.

The attached study also demonstrates that locating a new power plant in Redondo Beach will result in more air pollution to the region than if new capacity is located closer to where the greatest needs are. According to the study, the outage of SONGS drives increased power needs in Orange County. Serving this need from Redondo will require higher overall power outputs to compensate for line loss, and this, in turn, equates to more air pollution. So, not only is power generation not required at Redondo, building it at this location is inefficient and will increase overall air pollution versus alternative locations such as Huntington Beach or Los Alamitos.

Third, according to the power flow analysis in the attached report, the existing substation and power-lines that run approximately 5 miles from AES Redondo to just east of the 405 freeway can be permanently retired if power generation at this site is retired. Page 23 of the report states:

“... a relatively simple transmission system reconfiguration at La Fresa substation will allow the existing Redondo Beach 230 kV substation, and all four transmission lines between the existing Redondo Beach 230 kV substation and the existing La Fresa substation, to be removed. The removal of these facilities presents a unique opportunity to restore the entire Redondo Beach power plant site, as well as the existing transmission corridor between the Redondo Beach 230 kV substation and the La Fresa substation, to beneficial public use. Such restoration offers the potential for significant environmental benefits.”

Furthermore, the California Environmental Quality Act requires the investigation of alternative solutions when significant environmental impacts are unavoidable. Locating any new power plant closer to the actual power needs created by the SONGS retirement represents a significant decrease in environmental impact due to the reduced air pollution introduced into the South Coast Air Basin. Permanently retiring AES Redondo Beach will also eliminate the economic blighting impacts of the power lines and a new power plant.

AES has already submitted an application to replace their Huntington Beach plant and have indicated they plan to rebuild 2,000MW at their Los Alamitos facility. Both these sites are better located to serve the projected need for power with SONGS retired, and both represent less environmental impacts to the region. There are better economic and ecological options to efficiently maintain grid reliability than repowering AES Redondo Beach.

Lastly, there is sufficient conventional flexible generation capacity existing and planned to integrate renewable energy generation in this region. From the report:

“...no generation capacity at the Redondo Beach Station location is required to integrate intermittent renewable resources.”

I, therefore, call on the CEC to deny the AES application to build a new plant in Redondo Beach because the power is not needed at this site, and just as importantly, more ecological and economic alternatives are readily available.

The only rational conclusion as to the power plant is that the time has come for it to be eliminated. We trust that the Mayor and Council will vote to impose a building moratorium at the AES site and consider new zoning that does not include a new power plant. Common-sense must prevail.

Resident/owner of 640 the Village, Redondo Beach  
D.J. Schaub