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Against AES Redondo certification

Attn: California Energy Commission Re: Redondo Beach Energy Project, Docket Number 12-AFC-03 September 30, 2013

I am writing to urge you to deny AES Southland's application for certification to build a new 496-megawatt power plant on their 50-acre site in Redondo Beach.

The arguments against the plant include:

- It's unnecessary: According to an independent analysis commissioned by the City of Redondo Beach, this plant is not needed to maintain grid reliability standards. AES has already applied to rebuild their Los Alamitos facility and replace the Huntington Beach plant.

- Geographic mismatch with demand: Even if additional generator capacity were needed, it would be better to source that capacity closer to the demand created by the closing of the San Onofre Nuclear Generating stations. The Huntington and Los Alamitos facilities are significantly closer than Redondo Beach. Sourcing power from Redondo Beach would require additional energy -- and thus generate additional pollution -- to account for transmission loss.

- Health concerns over particulate matter in a densely populated area: The Beach Cities area is one of the most densely populated areas in the country. The proposed plant is certainly cleaner than the current one, per hour of run time; however, AES plans to run the plant at a much higher utilization rate than the current plant (which operates at less than 5% of capacity). The result is that a large number of people -- including children attending school in the area -- will be exposed to significant levels of particulates.

Arguments that denying this application somehow amount to a violation of AES' property rights seem to be a stretch. Power generation at this location is a conditional use, rather than a permitted use. Now, conditions have changed -- with the phasing out of once-through cooling, there is little reason to have a power plant with its attendant pollution in the middle of a densely populated coastal area.

Unless there is a proven, pressing need for additional generation capacity beyond what Huntington and Los Alamitos can supply, AES' Redondo Beach application should be denied. Thank you for your consideration in this matter.

Sincerely,

Felicia O'Sullivan