

DOCKETED

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Project Title:	Redondo Beach Energy Project
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Document Title:	Building a Better Redondo Response to AES Objection to Analysis of Alternatives
Description:	Document refutes AES comments on why an analysis of alternatives is inappropriate. Requests CEC to continue to mandate the analysis.
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BBR Response to AES Alternate Site Objection dated 27 Nov 13

BBR maintains that the CEC is justified in asking AES to explore alternatives to their Redondo location.

AES implies that they are proposing to modernize their current plant, when that is clearly not the case. AES is building a new plant on the same site and then it will tear down the current power plant.

AES implies that rebuilding at another site would create more impacts than their proposed plan. This is not the case. AES intends to run their current plant through the end of their current contract. And that is why they have proposed to build a new plant then tear down the existing plant. Building a new plant on an alternate site while running their current plant would have no increased impact over their current plant.

AES implies that significant impacts have not been identified. This is not factual. The City of Redondo has documented the negative impacts of the power plant since at least 1992. The City enacted new noise ordinances specifically addressing the noise impacts of the current plant. In 2005 the City deemed the area blighted and cited the negative fiscal, ecological and health impacts of the current plant. And both the City of Redondo and BBR have submitted documents demonstrating the negative impacts of the current plant the proposed new power plant. Due to the projects incompatibility with the land uses on all sides of the Redondo property, there is no way to build a new plant on this site without significant impact to the community. And the fact that the new plant would produce more power than the current plant to be viable, means that the impacts in many cases will increase from those conditions today. An analysis of alternative sites is not just prudent, it is required in this case.

AES implies that alternate sites would not meet most of the basic project's objectives. Alternate sites exist that would meet most of the basic project's objectives. For example, building a new plant at AES' current Alamitos and/or Huntington would meet most of the project's objective. These alternatives would produce power in Western LA basin. In fact, these alternate sites are more effective in meeting the projected needs with the loss of the San Onofre generation capacity. Both have existing natural gas and power transmission capacity.

AES states that alternatives would not meet the deadline for discontinuing once through cooling at the Redondo site. First there is nothing requiring AES Redondo to have a new plant online by that deadline. Right now AES has a gap between the end of its current power production contract and the projected on line availability of the new power plant. There is no power needs analysis that shows the AES Redondo site is required or is the most effective site for projected power needs through 2022.

AES implies it is unfair to require an analysis of alternatives for the Redondo Beach project when similar projects were not required to analyze alternatives. The AES Redondo site is a unique project and its impacts are unique due to its incompatibility with land uses on all sides of the AES Redondo site, the closeness of the incompatible land uses, the topography of the surrounding area, the density of residential

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neighborhoods surrounding the site, and compactness of the AES Redondo site. The decision of whether or not an analysis of alternatives for the Redondo project should be made in light of the unique elements and circumstances this site.

AES cites Public Resources Code Section 25540.6(b). This section does not preclude the CEC from mandating an analysis of alternatives. It clearly states “The commission **MAY** accept an application...without requiring a discussion of site alternatives...” The section provides the CEC the leeway to require such an analysis.

Although this is quibbling, the current site of the AES power plant was a Salt Lake designated as a State Historical site prior to being filled in for the current plant in the late 40’s and early 50’s. And prior to that nearby power plants had been built and moved twice with long periods of zero operation. When the power plant was sited here, there was no public small boat harbor and the area was an industrial area of the City. Obviously, the situation has changed the decision of whether a new plant is appropriate at this location should be made on current conditions and zoning and not conditions from fifty years to a century past. Current zoning on all sides of the plant allows an increase in the incompatible uses surrounding the power plant site. In fact, new medium density residential and commercial projects are currently underway just east of the power plant’s proposed siting. The incompatibility of a new power plant with surrounding uses is only going to increase in the foreseeable future.

AES implies they would continue to run the current plant if an alternative site is chosen in the end. This is ludicrous. First retro fitting the current plant to meet new cooling requirements, air pollution and noise requirements, and to be competitive with more modern plants would be far more expensive than building a new plant from the ground up. Second, AES does not have a contract to continue operation of the current plant beyond 2018. The current plant is too inefficient to compete for new contracts in the 2018-2020 and beyond timeframe. Third, if AES built a new plant at an alternative site, they would likely have to use their current boiler exemptions to reduce the costs of running the new plant. It is unlikely they would keep the current plant in operation. Fourth, AES acts as though they can modernize the current plant at their own discretion, which is simply not true. The major modifications for cooling, efficiency, air pollution and noise controls would require a variety of approvals that are not a foregone conclusion. AES is simply fear mongering with this line of response.

AES implies that it would be impossible to assess a “no project” alternative. This is inaccurate. The current site is zoned for parks and recreation and power generation. The State Coastal Conservancy has committed to helping the City establish a large park on this site. So that would be a “no project” alternative. What is not accurate is that the only “no project” alternative is the assumption that the current plant would continue in operation. This is emphatically NOT a realistic or reasonable assumption for all the reasons cited earlier in this response.

There is no doubt that a new power plant would continue the substantial fiscal, environmental and health impacts on the surrounding land uses and community.

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Reasonable alternatives exist including AES' own properties that meet project objectives. It is appropriate and prudent that the CEC continue to require an analysis of alternatives for AES' proposed Redondo Beach Energy Project. This is the wrong place for a new power plant by any reasonable analysis. And though the CEC cannot do a needs assessment, current, City of Redondo, CEC, CPUC and CAISO analyses demonstrate power is not required from this site and that indeed alternative sites are more efficient and effective in addressing projected future power needs.

On behalf of the residents of Redondo Beach and Hermosa Beach, BBR requests the CEC to stand by its mandate for alternatives analyses for the AES Redondo Beach Energy Project.