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| Docket Number: | 12-AFC-03 |
| Project Title: | Redondo Beach Energy Project |
| TN #: | 201641 |
| Document Title: | Siting Alternatives |
| Description: | Contends AES alternatives analysis is superficial. Requests assessment of four alternatives. |
| Filer: | James A Light |
| Organization: | Building A Better Redondo |
| Submitter Role: | Intervenor |
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Building a Better Redondo
Intervenor
6 Feb 14

Subject: Case 12-AFC-03, RBEP Alternatives
To: AES, CEC Staff, CEC Commissioners

The alternatives assessment submitted by AES did not consider alternatives that would potentially yield the greatest reduction in a new power plant's substantial and immitigable impacts to the surrounding community. BBR requests further analysis of alternatives described below.

- 1) In AES's the physical siting alternatives, AES neglects to assess the alternative **of placing the plant in the very center of its current property**. This location would maximize the distance of the new plant from the incompatible uses on all four sides of the AES property lines and thus minimize impacts from all size. Since noise generated by the plant is primarily dissipated by distance, maximizing the air space between the new plant and the surrounding development on all four sides of the property provides the greatest dissipation to all surrounding uses. This also reduces the visual impact of the plant on all four sides as the distance reduces the vertical angle of the view blockage.
- 2) A second alternative not examined **is siting the new plant on the west side of the property centered between the north and south property lines**. This maximizes the buffer between the dense residential development to the north, south and east of the AES property line. Again, increasing this buffer will offer maximum reduction in noise impacts to the residential development. Because it is both further away and lower in ground elevation, this location provides the minimum view impacts from the uphill terrain to the east of the plant and optimizes ocean views.

Both these alternative require the current plant to be demolished prior to the new construction. However, there is no requirement that the AES plant be available to produce power constantly through the construction period. There would be no substantive impact to grid reliability.

Furthermore, AES did not explore the no plant alternative and/or the locating the new plant at an alternate site.

- 1) **The CEC and AES should examine the alternative of providing power from AES' Huntington and Alamitos sites rather than at the Redondo site**. Evidence from CAISO, CEC, CPUC, City of Redondo and State Coastal Conservancy documents and testimony to Redondo Beach City Council demonstrate that some capacity from the current OTC plants in the Western LA Basin can be permanently retired. These same sources show the critical need in this part of the grid to be in the southern portion of the LA Basin/Western LA Basin. This need is most efficiently and effectively met by power generated from the current Huntington and Alamitos plant locations. In fact, serving that power need from Redondo would increase generation requirements due to line loss and increase overall pollution produced in the LA basin for power generation. AES has applied to rebuild the Huntington power plant and they have submitted a plan to the State Water Resources Control Board that indicates their plan to rebuild the Alamitos plant at full

current capacity. These sites have the infrastructure characteristics of if the AES site. So no new transmission, water, or natural gas infrastructure would be needed.

The alternative of providing power from these sites is less impactful from all aspects. The areas in question are industrial, and thus are not tightly surrounded on all four sides by incompatible uses. The sites are also much, much larger than the AES site providing the opportunity to better buffer impacts than are provided at the Redondo site. And as mentioned before, producing power much closer to the predicted need would reduce power generation requirements and thus reduce emissions overall in the LA Basin.

- 2) The CEC and AES should **evaluate the alternative of locating the new plant in Torrance near the Exxon refinery**. This is already an industrial area and has both the room and infrastructure to support a new plant in that area. This location would be less impactful due to the industrial uses already surrounding the location. The new plant would therefore not be incompatible with its surrounding uses.

BBR believes the analysis provided by AES was superficial and did not investigate alternatives that would represent a substantive reduction in the impacts of a new power plant. The current plant proposed minimizes AES' building costs, but it maximizes the impacts to the surrounding uses and increases impacts over the current plant location.

We have herein provided four reasonable alternatives to the AES proposed plan. All four provide AES with the ability to build a new plant and generate revenues from power production. All four have infrastructure available already to support power generation. And, all four mitigate and/or substantively reduce the impacts of the new plant on the surrounding uses. Again, BBR requests the CEC and AES explore these alternatives posed above.