

DOCKETED

Docket Number:	11-AFC-03
Project Title:	Cogentrix Quail Brush Generation Project
TN #:	202165
Document Title:	Elizabeth Frice Comments: Reject Suspension of Quail Brush Application
Description:	N/A
Filer:	System
Organization:	Elizabeth Frice
Submitter Role:	Public
Submission Date:	4/21/2014 4:43:26 PM
Docketed Date:	4/21/2014

Comment Received From: Elizabeth Frice

Submitted On: 4/21/2014

Docket Number: 11-AFC-03

Reject Suspension of Quail Brush Application

Dear Commissioners,

First, as a reminder the placement of Quail Brush power plant would be located directly across the freeway from Mission Trails Regional Park (MTRP), the largest open space preserve available to the citizens in our county. People come from not just San Diego but from all over to enjoy this beautiful park to escape the city life. It has a significant amount of miles of hiking, biking, and horse riding trails that are used by numerous residents and tourists each and every day. It is a true natural treasure to the people who live in and visit San Diego, it should be cherished. Plus, it's just plain immoral to put these people and animals in jeopardy of the small particulate matter that we know that technology has not yet been developed that can keep our air clean. Additionally, nearly half of the MTRP system would be in full view of the siting of this power plant. Gee, would you want to out for a day in what little open space that is left only to have an ugly power plant within your viewing? I highly doubt it. No matter what kind of landscaping they think is available, nothing available would make it "blend in" .

San Diego Gas & Electric (SDG&E) is proposing to contract for 450 MW of new peaking power plants, including the 100 MW Quail Brush plant. SDG&E states this capacity is needed to address a projected gap in local capacity on hot days and to "fill in the gaps" for intermittent solar and wind output. Here are the facts about SDG&E's claims:

☞ SDG&E's peak load is going down, from 4,643 MW in 2010 to 4,355 MW in 2011.

☞ San Diego County has a rooftop and parking lot solar potential of approximately 7,000 MW, far more than the peak load in SDG&E territory.

☞ Rooftop solar in San Diego is completely available on hot days, as there is little or no cloud cover. The solar resource is just as reliable as gas-fired generation when it counts, on the hottest days with highest electricity demand.

☞ California has a popular program "net-metering" that makes rooftop solar economic and that is expanding rapidly, with over 120 MW already installed in San Diego County. So far only about 1 percent of SDG&E's 1.4 million customers have rooftop or parking lot solar.

☞ SDG&E forecasts, with no factual basis, that the growth of rooftop solar will come to almost complete halt in 2017, despite the rapidly rising popularity of rooftop solar.

☞ Local rooftop and parking lot solar is obvious alternative to new peaking power generation.

☞ SDG&E is also attempting to force the retirement of fully functional local power plants owned to create a need for the new peaking units. These plants include NRG's 964 MW Encina Power Plant (Carlsbad), and nearly 200 MW of existing NRG peaker gas turbines.

☞ Peaking power plants are not a deal for SDG&E ratepayers. The capital investment in Quail Brush would be \$150 million. This cost, which will be shifted to ratepayers, will translate into higher electricity bills.

☞ San Diego's two largest new round-the-clock gas-fired plants, 540 MW Palomar Energy and 600 MW Otay Mesa, can operate as peaking units if necessary when part of the plant (the steam turbine generator) is down for repair. This is not recognized by the state grid planning agency (CAISO). This capability would add 230 MW to the grid at

times of highest peak demand. SDG&E has requested that CAISO recognize this capability, though it has not happened yet.

According to Environment California, April 10, 2014: "San Diego Ranks 2nd Nationally Among Major Cities for Installed Solar." "Solar power is booming across the country and cities are at the forefront," said Michelle Kinman, clean energy advocate at Environment California. "As one of the top ranking cities, San Diego is leading the way." To me, this is an indication that San Diegans are more interested in doing the right thing and using real clean energy, and do not want gas-fired power plants.

There are a few more things weighing on my mind, one is the fact that there are no close fire stations to respond in the event of a fire, this region is well known for its fire liabilities. Plus there are several endangered species in that particular region, and this company did not do its due diligence by selecting alternatives that were not in practically the exact same spot as the first location.

The California Public Utilities Commission has denied the application for a purchase power tolling agreement between Quail Brush and San Diego Gas & Electric. Quail Brush has failed to gain approval for its project from any elected body or planning group despite its powerful corporate influence because its project is weighted so heavily against public interest. The evidence on the record is overwhelming, the Quail Brush application should be vacated, not extended, which will justifiably relieve the public from the burden of avoiding its long, ongoing shadow. Please protect the public health and safety, endangered wildlife and Mission Trails Regional Park by rejecting the applicant's second request for suspension.

Sincerely,

Elizabeth Frice