

DOCKETED

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This plant must be consistent with Executive Order S-3-05

Huntington Beach Energy Project Comment

HBEP likely will increase system-wide greenhouse gas emissions, emitting an estimated 7.8 billion pounds of CO₂ each year. Plants being replaced by HBEP have emitted far less carbon than HBEP will. It is premature to claim that HBEP's carbon emissions will be "less than significant" before California puts in place an integrated Federal-mandated state carbon-reduction plan for all power plants.

The CEC must show how approving this plant is consistent with the Governor's mandate in Executive Order S-3-05, which requires California's GHG emissions be 80% below 1990 levels by 2050. The CEC must show how this plant's GHG emissions projections are consistent with at least a straight-line projection from now to 80% below 1990 levels by 2050.

In addition, because of the established loading order of preferred resources before fossil fuels, the CEC must do a comprehensive alternatives analysis to show how this plant cannot be replaced by preferred resources.

Finally, the CEC should provide a levelized cost projection comparing this plant (with accurate projections of natural gas price increases) with preferred resources.