

DOCKETED

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Comment Received From: Tiffany North

Submitted On: 6/18/2015

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Comment on Proposed Section 1742

Additional submitted attachment is included below.



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June 18, 2015

Docket Unit
California Energy Commission
1516 9th Street, MS-4
Sacramento, CA 95814

Sent Via Electronic Submission Only

Re: Docket No. 15-OIR-01 – Comments on Title 20 2015 Updates

Dear Commissioners:

Thank you for the opportunity to provide comments on the proposed amendments to Title 20 of the Code of Regulations relating to the Commission's process and procedures. While we recognize the Commission's need to establish a defined comment period on staff assessments, as being proposed in Section 1742, we are concerned that a minimum thirty day public comment period will not be sufficient. Staff assessments are often in excess of a thousand pages. The County of Riverside (County) has several different, distinct departments that must evaluate power plants as a whole and review the staff assessment and proposed power plant conditions of certification as they relate to County laws, ordinances, regulations and standards (LORS). Comments and proposed conditions from County departments on staff assessments are normally adopted by our Board of Supervisors at a public meeting. Reviewing the lengthy staff assessments, preparing comments, and having those comments considered and approved by our Board of Supervisors at a public meeting in a short thirty day timeframe is problematic.

We respectfully request that proposed Section 1742 be revised to include a public comment period of at least 45 days or such additional time as required by the presiding member. Alternatively, we propose that Section 1742 be revised to make clear that any comments submitted by a local agency after the close of the public comment period shall be considered by the Commission and not rejected. We further request that Section 1742 be revised to state that when comments are submitted by a local agency after the close of the public comment period, responses to such comments shall be included in the final staff assessment or in a separate addendum to the final staff assessment.

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Thank you for your attention and consideration of this matter.

Sincerely,

GREGORY P. PRIAMOS
County Counsel

A handwritten signature in black ink, appearing to read 'G. Priamos', followed by a large, stylized circular flourish.

TIFFANY N. NORTH
Deputy County Counsel IV-S

TNN: nr

cc: Michelle DeArmond, Chief of Staff to Supervisor Benoit
Juan Perez, TLMA Director