

DOCKETED

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Reasons to deny NRG's Willow Pass Generating Station Application - 08-AFC-06 (Application For Certification)

To: California Energy Commission/ Commissioners - 26th of April 2015

Re: NRG Willow Pass Generating Station (Power Plant) Application - 08-AFC-06 (Application For Certification)

Commissioners,

My name is Charles Davidson. I am a Contra Costa Co resident and as a volunteer, the Sierra Club has asked me to request that the California Energy Commission terminate NRG's Pittsburg Willow Pass power plant application.

We have heard that NRG was formerly in an acquisition mode, with several NRG power plant applications in California pending for multiple years

We have also seen that the former PG&E Willow Pass power plant going through several different owners within the last decade-and-a-half, ie, Mirant, Genon and now NRG. Importantly, it has been unused for a significant number of years.

For a number of reasons, it is prudent to discontinue to keep NRG's plant application pending.

Firstly, Calpine's two currently-operative dual-cycle power plants in Pittsburg already provide 40-50% of San Francisco's electricity, via the innovative 37-mile long Siemens underwater high-voltage direct current (hvdc) TransBay Cable. The TBC was initiated by the municipally-owned Pittsburg Power Company.

Notably, CleanPowerSF, San Francisco's Community Choice Aggregation (CCA) electricity-procurement program will be up and running in January 2016. And as San Francisco is one of the wealthiest cities in the U.S., that world class city will be voluntarily paying a premium for clean power that can be used to promote renewable energy buildout, especially outside of the City where more surplus land is available.

Secondly, Pittsburg already has much of its pollution burden acquired due to the externalization of pollution from San Francisco's electricity usage and Pittsburg is also among the top 10 percent most polluted communities in the state. Moreover, Pittsburg's particulate matter pollution hovers within the basin that includes Pittsburg, Antioch, Concord and Walnut Creek, as could be seen by the dense haze hovering over that basin due to the recent Lake County fire.

Thirdly, Contra Costa County has the highest rates of asthma per emergency room visits in CC Co. From an environmental justice perspective, Pittsburg has a 56 percent minority population and a 16 percent poverty rate, with those people most concentrated exactly near the NRG site. Notably, Pittsburg has six times the hospital asthma admissions rate compared to wealthier south county communities, such as Orinda or Lafayette.

Fourthly, CC Co. has, by far, the most brownfield and Department of Toxic Substances Control (dtsc) polluted sites in the entire Bay Area Air District (ie, the nine county BAAQMD region). Cumulatively, a total of over 60 sq miles of designated toxic sites, exist within the County, with much of that left over from WWII industry or located on refinery land (from its four refineries, that are also another large source of local pollution).

Therefore, NRG, a Texas company with a deficit of renewable energy generation within California, needs to aggressively lead in local Contra Costa County solar and perhaps wind generation.

Please deny NRG's Willow Pass permit.

Respectfully,

Charles Davidson
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