

DOCKETED

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Comment Received From: Colby Allerton

Submitted On: 12/17/2016

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PETITION TO CONDUCT ANY HEARINGS IN THE AFFECTED COMMUNITY (Huntington Beach Energy Project (HBEP))

Dear CEC Commission,

The projections for the HBEP are that the natural gas is not even needed! See the Op-Ed from the Los Angeles Times below. Preferred alternatives could be used instead, per state law and the loading order.

What this project accomplishes breaks that law, continues reliance on a polluting fossil fuel, and make air quality and health worse in the affected community.

Please provide adequate notice to the public and conduct any hearings in the affected community.

Please choose to replace this potential project with preferred, renewable and clean energy options which do exist, have been offered, and are cost-competitive or CHEAPER than natural gas.

cc/Sierra Club, Earth Justice, NRDC

<http://www.latimes.com/tn-hbi-me-1106-commentaryaes-20141024-story.html>

Commentary: Proposed H.B. power plant isn't needed

In March, the California Public Utilities Commission voted to authorize the procurement of some 1,300 to 2,200 megawatts of gas-fired electricity generation. It's very unclear that the state even needs such megawatts of additional capacity anytime soon.

And possibly worse, this month we've seen the improper communications and seemingly industry-protectionist behavior of outgoing CPUC President Michael Peevey .

And so here we are: The California Energy Commission appears close to green-lighting a new natural-gas plant in lovely Huntington Beach. [AES is seeking permission to build and operate a power generation facility entirely within the footprint of the existing Huntington Beach Generating Station, replacing that station.]

This is despite the energy not likely being needed soon. And there are many other reasons to oppose the plant â€“ big reasons that citizens and environmental groups have been sharing with the CEC. And the CEC is ignoring them.

The last thing the air and shore of Huntington Beach and greater Los Angeles need is another dirty fossil-fueled generating plant. The people of Southern California ask the commission to reject the gas-fired Huntington Beach Energy Project and choose cleaner, healthy, modern alternatives instead.

California is at a crossroads. But a CEC Environmental Superior Alternative study hasn't been done to weigh these new possibilities against HBEP. And the CPUC confirms that fast-ramping gas-fired capacity isn't needed in 2015 in the L.A. basin and hasn't said when it will be. CPUC and CEC have forecast that generating capacity there will stay well in excess of mandated reserve margins for many years.

HBEP likely will increase systemwide 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.

HBEP's siting is risky: a low-lying beach plant potentially susceptible to surge risk and flood damage, with earthquake faults under Huntington Beach. The city is located over oilfields as well. Gas-fired plants shouldn't be located where they can present a risk to public safety.

The plant would present a visual blight on a beautiful, scenic beach vista, despite California's Coastal Act. The CEC needs to evaluate the alternatives, considering how already-approved plants plus preferred resources can meet the community's need for base-load power and renewables integration for the future.

So is this proposed new Huntington Beach gas plant really in the best interests of Huntington Beach residents, Californians and the climate? Is it really even needed, considering what we know?

On March 13, the CPUC voted to authorize Southern California Edison and San Diego Gas & Electric to procure an additional 400 to 900 megawatts "from any resource," in addition to the 1,300 megawatts it already authorized from "gas-fired generation." The good news is, the CPUC has required the utilities to replace at least half the power from the retired San Onofre Nuclear Generating Station with clean energy. The bad news is the utilities will get to replace the other half with dirty gas plants.

That's a problem because all those dirty new megawatts aren't even needed, given California's growing oversupply of electricity.

We cannot allow any more polluting gas-fired power plants to be built "adding to the Southland's clean-air woes" when they could've replaced San Onofre power with 100% clean energy. We challenge the notion that California energy regulators must tie us all into fossil fuels for decades more to come.

Some fret that the permanent shutdown of San Onofre Nuclear Generating Station could cause shortages with brown-outs and blackouts similar to what occurred in the early 2000s. But they are mistaken.

During that phony "energy crisis," California's electrical grid had enough generation capacity to supply all state needs. But Enron and other out-of-state grid suppliers "sat on their power," even "shutting off" some generation facilities. It was criminally manipulated price gouging, and Enron and others made billions off Californians.

Since 2001, more than 20,000 megawatts of natural-gas capacity has been added in California. More important, over 12,000 megawatts of clean resources like wind, solar and geothermal also have been added, and additional clean resources are available from other states. And thanks to improved energy-efficiency regulations and expanded rebate programs, peak electricity loads in California have stayed essentially constant over the past 16 years, even while the state's population grew by 16%. Including out-of-state capacity already under contract to California, over 60,000 megawatts are available to California's families and businesses served by the private utilities "but last year's peak load was only 45,000 megawatts. So we have plenty of electricity.

The grid is stable. We have 30% more capacity margin for reliability at peak load, far beyond what federal regulators say is required. Critics lambast CPUC's regulators and the private grid managers for having perpetuated the glut, allowing utilities to contract with third parties for more big, unnecessary power plants while we pay double the cost for electricity we paid 15 years ago.

And the beat goes on. The CPUC's new decision now mandates that Southern California Edison and San Diego Gas & Electric procure hundreds more megawatts of dirty, gas-fired generation. California simply does not need that. To arrive at this recommendation, they discounted all energy storage, renewable energy and transmission solutions, assuming that only "10 to 20% of these resources will be available, in some combination." This arbitrary decision has

apparently been pulled out of thin air, unsupported by any facts or research. The CPUC had been given better data but disregarded it. The commissioners are not acting in the public interest, and they're denying that they have alternatives, which is wrong.

There is a better way. Engineering reports show that we do not need more new generation anytime soon, and certainly not more polluting fossil fuels, including natural gas. The long-term CPUC plan that continues to preordain natural gas and ties California to fossil fuels for more decades to come must be reversed. We have time to phase in better energy-efficiency measures, better demand response and more distributed solar and wind to offset any increased needs. SCE's own "Living Pilot," aka Preferred Resources Pilot, program could show the feasibility and affordability of dozens of clean alternative technologies that can scale up and integrate more renewables into the grid.

In the face of coming climate disruption and serious health issues associated with coal, gas and fracking, it is essential public policy to not only put the brakes on use of dirty fuels but also plan to sunset their use altogether as fast as possible and move to more clean renewable power.

The public now must focus on stopping each individual fossil-fuel plant, including this Huntington Beach proposed project, drawing the line in each community. No one wants these dirty generators in their backyard anyway, and California's future is in all of our backyards.

The California Energy Commission is holding hearings about the plan, and the public can call in to comment at 866-469-3239 on the following dates:

â€¢2 p.m. Monday: access code 924 219 516, password pwd#1516

â€¢9 a.m. Wednesday: access code 925 646 689, password meet@9am

Loretta Lynch

Former member of the California Public Utilities Commission

Colby Allerton

Past administrator of environmental programs, Santa Monica Mountains Conservancy
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Conservation Energy Saving Energy Resources Global Warming

Additional submitted attachment is included below.

The CEC Should Stop Green-Lighting New Natural Gas Plants in Huntington Beach. The CPUC Has Been Over-Reaching During Procurement, and We Know Now Utility Industries Have Had Undue Influence on and Access to the CPUC

In March of this year the California Public Utilities Commission (CPUC) voted to authorize the procurement of some 1300 to potentially 2200 MW of gas-fired generation. It's very unclear that the State even needs such MW of additional capacity anytime soon (see below, via past CPUC President Loretta Lynch).

And possibly worse, we've just this month seen the improper communications and seemingly industry-protectionist behavior of outgoing present-day CPUC President Michael Peevey. (http://www.mercurynews.com/business/ci_26695540/michael-peevey-top-leader-puc-wont-return-commission).

And so here we are: the California Energy Commission (CEC) appears close to green-lighting a new natural gas plant in lovely Huntington Beach, California. Despite that the energy is not likely soon needed. And there are many other reasons to oppose the plant, big reasons, which citizens and environmental groups have been sharing with the CEC. And the CEC is ignoring them.

The last thing the air and shore of Huntington Beach and Greater Los Angeles need is another dirty fossil-fueled generating plant. The people of Southern California ask the Commission to reject the gas-fired Huntington Beach Energy Project (HBEP) and choose cleaner, healthy, modern alternatives instead.

California is now at a crossroads. But a CEC Environmental Superior Alternative study hasn't been done to weigh these new possibilities against HBEP. And CPUC confirms fast-ramping gas-fired capacity isn't needed in 2015 in the L.A. Basin -- CPUC hasn't said when it will be. CPUC and CEC have forecast generating capacity there to stay well in excess of mandated reserve margins for many years.

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.

HBEP's siting is risky: a low-lying beach plant potentially susceptible to surge risk and flood damage, with earthquake faults under Huntington Beach. The city is located over oil fields as well. Gas-fired plants shouldn't be located where they can present a risk to public safety.

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So is this proposed new Huntington Beach gas plant really in the best interests of Huntington Beach residents, Californians, and the climate? Is it really even needed considering what we know?

History: California is Flush with Electricity. The CPUC is Still Ringing a False Alarm, Asking for Big New Fossil Fuel Plants and Sticking Ratepayers with the Bill

On March 13th, 2014 the state's Public Utilities Commission (CPUC) voted to authorize Southern California Edison (SCE) and San Diego Gas and Electric (SDG&E) to procure an additional 400 to 900 megawatts (MW) "from any Resource," in addition to the 1,300 MW it already authorized from "gas-fired

generation.” The good news is the CPUC has required the utilities to replace at least half the power from the retired San Onofre Nuclear Generating Station with clean energy. The bad news is the utilities will get to replace the other half with dirty gas plants.

That's a problem. Because all those dirty new megawatts (MW) aren't even needed, given California's growing oversupply of electricity (see stats below).

We cannot allow any more polluting gas-fired power plants to be built – adding to the Southland's clean air woes – when they could've replaced San Onofre power with 100% clean energy. We challenge the notion that California energy regulators must tie us all into fossil fuels for decades more to come.

Some fret that the permanent shut down of San Onofre Nuclear Generating Station (SONGS) could cause shortages with brown-outs and black-outs similar to what occurred in the early 2000s. But they are mistaken.

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And the beat goes on. The CPUC's new decision now mandates Southern California Edison (SCE) and San Diego Gas & Electric (SDG&E) to procure hundreds more MW of dirty gas-fired generation. California simply does not need that. To arrive at this recommendation, they discounted all energy storage, renewable energy, and transmission solutions, assuming that only “10 to 20% of these resources will be available, in some combination.” This arbitrary decision has apparently been pulled out of thin air, unsupported by any facts or research. The CPUC had been given better data, but disregarded it. They're not acting in the public interest, and denying that they have alternatives, which is wrong.

There is a better way. Engineering reports show that we DO NOT NEED more new generation anytime soon, and certainly not more polluting fossil fuels, including natural gas. The long-term CPUC plan that continues to preordain natural gas, and ties California to fossil fuels for more decades to come must be reversed. We have time to phase in better energy efficiency measures, better demand response, and more distributed solar and wind to offset any increased needs. SCE's own “Living Pilot – aka Preferred Resources Pilot ” program could show the feasibility and affordability of dozens of clean alternative technologies that can scale up and integrate more renewables into the grid.

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Loretta Lynch
California Public Utilities
Commissioner from 2000-2005
President from 2000-2002

Colby Allerton
Editor, Writer
Past Administrator of Environmental Programs
Santa Monica Mountains Conservancy 2000-2003