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Clean Coalition Rebuttal Testimony

Additional submitted attachment is included below.

STATE OF CALIFORNIA
Energy Resources Conservation and
Development Commission

In the Matter of: APPLICATION FOR CERTIFICATION OF THE STANTON ENERGY RELIABILITY CENTER	Docket No. 16-AFC-01 Intervenor Clean Coalition
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Clean Coalition Rebuttal Testimony in Stanton Energy Reliability Center Application for Certification

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CLEAN COALITION REBUTTAL TESTIMONY

Stanton's Opening Testimony offers very little new substantive content and largely agrees with the Final Staff Assessment (FSA) analysis on alternatives. Specifically, Stanton's proponents claim the alternatives analysis "describes a reasonable range of feasible alternatives and appropriately concluded that there are no feasible alternatives which would reduce significant environmental impacts from SERC nor would cure any potential violation of applicable laws, ordinances, regulations or standards (LORS) by SERC."¹

Since Stanton's Opening Testimony essentially mirrors the findings found in the FSA, which were the basis of the Clean Coalition's Opening Testimony, there is not much for the Clean Coalition to add outside of our Opening Testimony. The Clean Coalition reiterates that the alternatives analysis should provide a feasible alternative in the Battery Energy Storage Alternative as well as a more thorough analysis of a solar+storage alternative to the SERC, which each would not result in any carbon emissions and would save millions of gallons of fresh water every year. The failure to consider distributed generation solar+storage alternatives that may extend to other sites within the West Los Angeles Basin sub-area unwisely eliminates superior alternatives from consideration and leave ratepayers and Californians worse off.

CEQA requires that "the consideration of alternatives must be judged against a rule of reason."² When analyzed under a "rule of reason," SERC should be compared to alternatives that are designed to meet objectives, which would identify superior alternatives, in light California's carbon-free energy goals, the ability of energy storage to provide similar levels of reliability, and the excessive use of precious freshwater resources. The Energy Commission needs to conduct a more thorough alternatives analysis before the SERC can be approved.

¹ Stanton Energy Reliability Center - Opening Testimony, Alternatives, p. 1.

² *Citizens of Goleta Valley v. Board of Supervisors*, 52 Cal.3d 553, at 565.