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## **CEC Diablo Cost Comparison Report Draft is Flawed and Biased**

This draft report, like past CEC material on Diablo Canyon, seems geared to support a predetermined conclusion that the continued operation of Diablo Canyon is the only way for California to maintain system reliability in the coming years. The report asserts, without citation or substantiation, that California is completely maxed out on procurement of more renewable power, and therefore rejects all renewable energy from further analysis in this report. The report thus fails in its basic statutory aim, of conducting a cost comparison of continued operations at Diablo Canyon with available alternatives. The draft report shifts the goalposts of longstanding regulatory methodology, ignores viable alternatives, and offers an analysis insufficient to match the stakes of the situation. This report should be sent back to the drawing board, giving CEC staff time to incorporate feedback received in this public comment period (as it is, the final report is due to be issued just a few days after the close of this public comment period, rendering it obvious that the CEC doesn't plan to give due diligence to these public comments, as doing so would take longer than a few short days).