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**Comments on DCPD Cost Comparison by Camille Kuta**

*Additional submitted attachment is included below.*

October 9, 2023

## Comments on California Energy Commission's Draft Senate Bill 846 Diablo Canyon Power Plant Extension Cost Comparison

There are many problems with the CEC's "Draft Senate Bill 846 Diablo Canyon Power Plant Extension Cost Comparison," but the most glaring issue is that it does not do what it was required to do by SB 846. SB 846 says that the cost comparison should compare Diablo with "a portfolio of other feasible resources available for calendar years 2024 to 2035, inclusive, is consistent with the greenhouse gases emissions reduction goals of Section 454.53 of the Public Utilities Code." This draft cost comparison report breaks the requirements made in the bill in two major ways.

Firstly, the report ignores all conventional clean energy sources and storage including wind, solar, batteries, and small and pumped storage hydro. These resources are removed from consideration based on the claim that ordering more of these resources than is already planned would create too much competition and a market bottleneck that would delay getting the clean resources online; however, the report gives no evidence that this would be the case, nor that California is in danger of nearing this market bottleneck. By claiming that all resources that could be used to fill in the gap left by Diablo are infeasible, this cost comparison simply adds together the costs of Diablo's operations and fails to compare those costs to anything.

The second way this report does not follow SB 846 is that it does not utilize the resources available from 2024 to 2035, as the bill requires. Instead it only analyzes 2024 and 2025, which makes it easier to claim that no resources will be available to replace Diablo in time. Of course with less than one year of warning, it probably would be challenging to completely replace Diablo with other resources, but with more time it would become completely feasible. The phase-out agreement took place in 2016, so the state has had plenty of time to arrange for replacements for Diablo Canyon already. The report acts under the assumption that there is no time to procure sufficient replacement resources in the next two years, when resource planning has already been done with the retirement of Diablo in mind, and at least some of this previous planning should be counted as replacing Diablo.

There are other issues with the report, though unfortunately it seems as though public comments are solicited but not actually read or taken into consideration by the CEC. Public comments on the July 7 Diablo Canyon workshop are not discussed, acknowledged, or deliberated in any way in the cost comparison itself. There is also only about a week window in between this comment period ending for the draft cost comparison and the final cost comparison, so there is not enough time to incorporate public comments into the final and make the appropriate edits, suggesting that there is no intent to seriously consider any public input.

This report was clearly biased to the result of extending Diablo's lifetime as it did not even try to perform a reasonable cost comparison of other resources to Diablo. As detailed in my previous comment, Diablo Canyon should be shut down on schedule with the phase-out agreement because of Diablo's precarious location between earthquake faults and Diablo's continued production of nuclear waste the United States still has no solutions for.