

**Docket Optical System - Docket Number 09-IEP-10**

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**From:** <f.brandt@att.net>  
**To:** <docket@energy.state.ca.us>  
**Date:** 5/18/2009 2:04 PM  
**Subject:** Docket Number 09-IEP-10

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California Energy Commission  
Dockets Office, MS-4  
Re: Docket No. # 09-IEP-10

5/18/09

I sent the following correspondence to you on 4/28/09 as an email and also as a letter to the CEC. Then I sent it again on 5/11/09. after I saw that you put my 4/27 letter as a public comment to the proceedings of the 11 May meeting. Now I see that you are still publishing my 4/27 submittal so I am re-sending the 4/28/09 letter and ask you to withdraw the 4/27/09 letter which has an error and replace it with the corrected 4/28/09 copy. Thank you'

Frank Brandt

4/28/09 email and letter to CEC

Withdrawal of private citizen, Frank Brandt's comment to:

Docket Number 09-IEP-10

2009 IEPR OTC

Please withdraw my public comment submittal dated 27 May 2009 and replace it with the following

Public comment by Frank Brandt, a ;private citizen to:

Docket Number 09-IEP-10

2009 IEPR OTC

This docket pertains to a workshop by the CA Energy Commission dealing with once-through- cooling (OTC) for industrial processes in CA.. Substituting cooling towers for OTC is a good idea when the source of cooling water is a small river or pond which overheat during the summer months. This has resulted in government mandates of OTC for power plants worldwide.

The CEC workshop must consider the pitfalls to OTC before promoting legislation mandating it across the board.

One of the most important pitfalls is the cost of OTC. Mandating OTC will cost the citizens of CA millions of dollars and will affect the poor more than the wealthy. Cost benefit studies should be mandatory before OTC is required.

The cost of lowered cooling efficiency of cooling tower processes versus OTC ones must be considered. Substituting cooling towers for OTC when the source is the ocean should be mandated only in unusual cases

I am aware that there are studies of the effects on aquatic wildlife at OTC warm water discharge locations which imply that there is unacceptable damage. I can only counter that a favorite spot for individual fishermen to cast their lines is at power plant discharge locations. I have seen this personally at fresh water river and salt water ocean power plant discharge locations.. Before millions of dollars of taxpayer and rate payer money is spent in a government effort to coerce the utilities to stop once through cooling I believe that the data showing "unacceptable" aquatic damage should be reviewed carefully to be sure that we are not tilting at windmills..

The private citizen is already being charged dearly for the legislative fiat to reduce CO2 production as

a "major contributor to global warming" when it is obvious that clouds (water vapor) are much more effective than CO2 in affecting climate. A cloud passing by when the sun shines has an obvious immediate effect on the temperature. At night when the earth radiates to the sky there is an obvious effect on the minimum temperature. Just watch your thermometer readings on a cloudy night versus a clear night. Here in San Jose the clear night minimum temperatures are at least 10 degrees lower than cloudy night minimums

If cooling towers are mandated, tons of water vapor will be sent into the atmosphere which will negate much of any CO2 reduction caused by legislative fiat.

Cooling towers require fresh water as the working agent. Not only will a tower release water vapor to the atmosphere that water is fresh. Fresh water which is sent to the atmosphere rather than being returned to its source is not always available in large quantities at industrial sites.

If you wish to substitute "renewable" energy for fossil energy and OTC, be aware that solar and wind energy being diffuse and non reliable cannot substitute for reliable energy sources.

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