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09-IEP-1A

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#09-IEP-1A Final 2009 IEPR CREED submission

To: Suzanne Korosec Integrated Energy Program Report Manager
To: California Energy Commission
To: Barbara Byron Nuclear

From: Coalition for Responsible and Ethical Environmental Decisions, CREED
Research Staff Volunteers

CREED's appeal directed through our California Energy Commission is a citizen call for justice in our governmental system. Our comment for the record of the 2009 IEPR focuses on the draft staff consideration of imposition of penalties on IOUs for non-compliance with Renewable Portfolio Standards target percents of renewables acquisitions.

We suggest incentive rather than penalties. Plan development that establishes renewables distributive energy achievement as requirement for monetary rewards, and provision of requested and required information, as basis for approval of rates that allow profit and incentive claims, would reduce the unjustifiable excess profit taking that has corroded the system ethics. The nuclear utilities have become the "too big to fail/too big to regulate/too big hands in the rate-payers pocketbooks."

CREED's action policy has been promotion of incentive for achievement of the State of California's adopted Energy Action Plan of transition to energy efficiency programs with demand response and renewables distributive.

California has failed to achieve this transition because deregulation and corporatization of energy in California has removed that incentive to transition by allowing the nuclear utilities to instead achieve a government protected semi-monopoly of energy generation and distribution---with "blank check" subsidy from rate-payers awarded in conjunction with California Public Utilities Commission decision of December 2005 A.04-02-026 com-mpl-rsk-gi. Edison was given CPUC assurance that all of the expenditures on the "steam generator replacement project," could be charged to the ratepayers.

This process could result in decommissioning and financing "stranded investments" on units II and III--- far greater than those of Unit I, closed down after 24 years of problem operation very similar to Units II and III.

When Unit I was shut down in 1992, it left ratepayers charged for four years for stranded investments, which fact alone, should be proof that the Units II and III in similar end years failings and added \$billions "refurbishments" are just too expensive to be allowed to pile up rate-payer public indebtednesses,

only three years from its only site specific, public participation safety licensing conclusion--- its original design basis licensing to 2013.

The IEPR report can initiate needed revisions of the unethical processes that bind our protective commissions---by recommending California governmental bodies' rejection of the NRC pre-emption of consideration of allowable radiation standards, terrorist potential threat, evacuation viability, acceptability of metal equipment that cannot withstand the violence of nuclear generation process, and consideration of industry failure to develop high level radiation wastes safe disposal.

These and many more immitigable negative impacts of nuclear generation have been stricken from ethical assessments of nuclear power by NRC enforcement of the States Agreements between nuclear states and the NRC, and we find---prevent our State protective agencies, commissions from performance of their duties in the public interest.

The unethical States Agreements are allowing Edison to proceed with its experimental compromise of the cement and steel containment buildings of Units II and III of San Onofre, not complying with the original license stage safety standards projections.

We find nuclear power generation to be a failed technology which must not be accorded extended life in the midst of San Onofre state park surfing beach, two miles from the San Clemente-Capistrano Bay more than 100thousand person population center, and less than a mile from the Pendleton Base community of San Onofre, and in violation of NUREG 50-100 population stipulations.

Additionally, CREED asks that these recognitions be factored into the cost comparisons, and that the Energy Commission attempt to bring some sense of reason to the Nuclear Regulatory/CPUC/Edison destructive course at San Onofre

Respectfully submitted:

CREED Coalition for Responsible and Ethical Environmental Decisions
Research Staff

Communicated by Lyn Harris Hicks, CREED Advocate

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