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California Energy Commission  
1516 Ninth Street, MS #12  
Sacramento, CA 95814-0027

Robert B. Weisenmiller, Chairman  
Presiding Member  
Integrated Energy Policy Report Committee

Karen Douglas, Commissioner  
Associate Member  
Integrated Energy Policy Report Committee

Dear MS Douglas and Mr. Weisenmiller,

California state electrical energy policy is exceptional, unfortunately closer to exceptionally bad rather than exceptionally good. Why does the legislature ask the CEC to review its policy? Is it because they would like to improve the policy or is because they want reassurance that it is ok? The CEC is caught in a bad position. If they tell the legislature the policy needs improvement their funding will probably be reduced. It is safer to tell the legislature everything is OK and this is the tactic that the CEC is using as it sets up the IEPR scoping procedure. As a California rate and taxpayer I am sorry that the CEC takes this position because the state electrical energy policy really needs improvement.

I have previously made comments on the 2011 IEPR.. I don't know whether you have read them, If you have, you have probably dismissed them as remarks from some old codger in San Jose that you don't agree with and the best approach is just to ignore them. This is your privilege but as a concerned citizen with some knowledge of electrical energy problems I am sad if this is your response to my comments. I am also sad because despite your request for comments I can't find mine in any easily accessible location in the scoping files.

In general the electrical energy policies of the state have not addressed the real energy problems of the state. Legislative and executive statutes dealing with electrical energy seem to be addressed to perceived social, special interest and Sierra Club opinions rather than sound engineering facts. Some of them have been disastrous. The policy of discouraging new power plants has meant that the state lacks in-state generation capacity which lead to substantial importing of electrical energy which lead to a chance for savvy groups to manipulate the CA energy market which lead to PG&E having to

sell electricity below cost which lead to PG&E bankruptcy. The state requirement that IOUs separate electrical generation from distribution is a loser since it removes the incentive for them to produce sufficient 24/7 electricity at the lowest cost while it creates a market for merchant generators whose incentive is to get the maximum for their product. If past state electrical policy is so great why are CA electrical rates among the highest in the US? It seems clear that the 2011 IEPR must take markedly new tactics and change directions sharply to avoid new disasters.

The most pressing problem is that the state needs a lot more in-state generation capacity for reliable 24/7 electricity that the public and industry require. It is currently allowing some additional gas fired plants which don't help the state policy of reducing greenhouse gas production.

The state has mandated via AB32 that state defined "renewable" energy be used to generate a portion of the electricity in the state. The ostensible reason for the state selected energy sources was to reduce production of greenhouse gas. Solar and wind don't produce ghg but they are unable to generate reliable 24/7 electricity. Small hydro is not reliable for the same reason as large hydro.. The state imports lots of large hydro and was burned when the Columbia River water supply was low. Biofuels are not practical and produce GHG. Geothermal is not available in the quantities required. Ocean wave energy to generate electricity is ridiculous. The governor' request for more distributed generation does not help provide reliable 24/7 electricity The state was careful to exclude nuclear in AB 32 even though it is the only energy source that can generate large quantities of reliable 24/7 electricity with no GHG production..

If the state truly wishes to meet the reliable 24/7 electrical energy requirements of its citizens and industry while making meaningful reductions of GHG production it has no choice but to include nuclear in its energy mix. The state defined "renewables" cannot do the job.. The IEPR scoping can schedule any number of workshops on trying to make AB32 work but they will surely fail unless the nuclear workshop finds a way to get the state to add nuclear energy to the mix instead of blocking it. As I have written previously this may be anathema to the legislature, governor and CEC but the CEC will be derelict if it does not try to reverse this bad state policy.

Frank Brandt  
San Jose, CA.

*Francis A. Brandt*