

Statement of Ben Davis Jr. Proponent of California Initiative 11-0042, The Nuclear Waste Act of 2012. Docket number 11-IEP-1A. Draft 2011 IEPR, "California Nuclear Power Plant Issues."

In the December 2011 Integrated Energy Policy Report Lead Commissioner Draft it is stated that:

"Although the 2008 IEPR Update highlighted the need to improve electricity planning and reliability assessments to fully understand the reliability risks and other consequences of lengthy, unplanned outages at these nuclear plants, these assessments have not been completed."

A comparison of the Recommendations from the 2008 IEPR Update referred to above, and the 2011 IEPR Draft demonstrates that no progress has been made in the last three years, and that the Commission is making the same recommendations for the same reasons as they did three years ago, including the recommendation that the studies be completed "in a timely manner."

2008 IEPR Update:

Lessons Learned

As part of the license renewal feasibility analyses for the CPUC, PG&E and SCE should summarize the lessons learned from the Kashiwazaki-Kariwa plant experience in response to the 2007 earthquake and any implications for Diablo Canyon and SONGS, including whether any additional pre-planning or mitigation could minimize plant outage times following a major seismic event.

Recommendations

- The existing California ISO □organized Stakeholder Study of Aging Power Plants and Once □Through Cooling Mitigation should be completed as quickly as feasible using sound analytic techniques, and the results should be closely reviewed to determine whether further studies are needed to understand the issues resulting from unplanned outages of Diablo Canyon and SONGS. To the extent such supplemental studies are needed, they should be commissioned and completed in a timely manner.*
- The Energy Commission, CPUC, and California ISO should further evaluate the unique uncertainties of losing the electricity provided by Diablo Canyon and SONGS over an extended period, identify how resources might be acquired that have an energy supply capability beyond that used in normal market conditions, and modify the long □term planning and procurement process at the CPUC to ensure that these resources are acquired in a timely manner.*

2011 IEPR Draft:

Recommendations

In light of the accidents and/or plant shutdowns following earthquakes at Fukushima Daiichi (2011), Kashiwazaki-Kariwa (2007), and at the North Anna nuclear plant (August 23, 2011) and other considerations, the Energy Commission, in consultation with the CPUC, recommends the following:

Replacement Power and Reliability

- To support long-term energy and contingency planning, the California ISO (with support from PG&E and SCE) should report to the Energy Commission as part of its IEPR and the CPUC as part of the CPUC's Long-Term Procurement Plan on what new generation and/or transmission facilities would be needed to maintain system and/or local reliability in the event of a long-term outage at Diablo Canyon, SONGS, or Palo Verde. The utilities should report to the CPUC on the estimated costs of these facilities.*
- As a contingency in the event that Diablo Canyon and SONGS experience a long-term outage following a major seismic or other event, the Energy Commission, CPUC, and California ISO, in cooperation with PG&E and SCE, should further evaluate: (1) the uncertainties of a long-term loss of electricity from these plants, (2) the extent to which existing resources have an energy supply capability beyond that used in normal market conditions, and (3) the need for new resources or different types of resources to satisfy any remaining energy gap. If necessary, the long-term planning and procurement process at the CPUC should be modified to ensure that any replacement resources found necessary through these studies are acquired in a timely manner.*

On December 14, 2011 I emailed the following questions and records act request to the CEC, concerning the Draft 2011 IEPR:

"Jared, On page 191 of the Draft it is noted that "Although the 2008 IEPR Update highlighted the need to improve electricity planning and reliability assessments to fully understand the reliability risks and other consequences of lengthy, unplanned outages at these nuclear plants, these assessments have not been completed."

I have a number of questions concerning this statement.

-It's been nearly 4 years. Why haven't these assessments been completed?

-Who specifically is doing these assessments? And by this, I mean I want the names of all individuals involved and the role they have in the study.

-Does the CEC have any evidence that any significant time has been spent on these assessments since the 2008 IEPR Update?

-When are the assessments expected to be completed? If an exact date has not been determined, then please offer a range or estimate.

-Has the timetable for completing these assessments been accelerated in light of the recent nuclear accidents in Japan?

If it will take more than a few days to answer the above questions, please offer me a time estimate for when I may receive a response.

I am also hereby making a records request for all information concerning these assessments, including all communications between CEC staff, and any other agencies or individuals. If you would like me to formalize this records request please let me know. However, I do not want the time spent to do a records act request to delay the time for responding to the above questions, as the answers to these questions are important to my response to the Draft IEPR, and I have only till the 23rd to respond.

As always, thank you for your help in this matter.”

I have currently not received an answer to this email. I hereby request that the answer be included in these proceedings. I have asked that I be granted an extension of time to comment in these proceedings until a few days after receiving a response. My request was denied and therefore my comments are incomplete.

One question which I had wished to pursue is this: Prior to the Japan accidents, had there been any predictions by any knowledgeable source, that a 9.0 quake could happen there? I ask this to gain perspective on the statement on page 184 of the draft that a 9.0 quake is not thought to be possible here.