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COMMENTS OF
SOUTHERN CALIFORNIA PUBLIC POWER AUTHORITY
REGARDING

THE JOINT PETITION OF THE NATURAL RESOURCES DEFENSE COUNCIL
AND THE SIERRA CLUB

FOR INITIATION OF A RULEMAKING REGARDING CALIFORNIA'S
EMISSIONS PERFORMANCE STANDARD

DECEMBER 14, 2011

The Southern California Public Power Authority (SCPPA) would like to submit brief comments regarding the Joint Petition of the Sierra Club and the Natural Resources Defense Council. The Petitioners seek to expand SB 1368 and change its intent.

SCPPA's general position is:

1. We would welcome increased clarity in the regulations, BUT
2. We believe that SCPPA and the other Publicly Owned Utilities already clearly understand, and are already complying fully with the requirements of SB1368.
3. We firmly believe in the value of local control. We object to any action that weakens or removes decision-making authority from local boards and commissions.
4. We do not believe the creation of another state bureaucracy to review and approve every capital expense at out-of-state coal plants in advance is necessary or fiscally responsible, especially in the current economic climate.
5. There are many mistakes, misunderstandings, or misrepresentations in the petition, particularly regarding SCPPA's ownership status at San Juan, and the California owners' ability to block and/or refuse to pay for capital projects mandated by the United States Environmental Protection Agency.
6. The Sierra Club is criticizing SCPPA and the other San Juan owners for spending \$340 million on environmental upgrades initiated by a Consent Decree settling the Sierra Club's own lawsuit.
7. The Petitioners are attempting to rewrite SB 1368, and change the legislature's intent.

We hope the Commission will not grant the Petitioners' request. However, if the request is granted, be assured that SCPPA will participate cooperatively in the rulemaking discussions.

Thank you for your consideration.

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