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California Energy Commission
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 Re: Docket No. 11-IEP-1A
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Comments by Frank Brandt on the Lead Commissioner Final Report 2011 Integrated Energy Policy Report

I fail to see any value to this report even if it was a huge effort by a large group of people. The fundamental problem is that the Governor and legislators do not understand how to establish a good State energy policy. Instead of helping them the CEC insists on making a report with lots of useless verbiage that supports the bad policy but does not analyze why the policy is good or bad. A case in point is, why is it important to authorize construction of lots of new fossil gas fired plants to support the construction of unreliable solar and wind plants. If the object is to have reliable 24/7 electricity and reduce GHG production would not it be better to construct more nuclear plants which will generate reliable 24/7 electricity at the same time not produce any GHG. The legislature and Brown may not like nuclear plants but the CEC should discuss why this is good or bad policy instead of just repeating the warts of nuclear power.

My comments on the draft IEP report apply as well to the final IEP report and are repeated here.

As I have commented previously the CEC seemingly has little concept of how to properly advise the legislature on regulating electrical energy in California. This draft report is much too long and really does not address the real problems of electrical energy regulation in the state. It is simply a restatement of bad energy policy from previous policy reports.

The real energy problems of the state are:

1. The state has insufficient in-state electrical generating capacity. Additional electric power is purchased from out of state sources. The report should discuss this and detail why this policy is the proper one or state why it should be changed.
2. The state policy has mandated that reliable 24/7 energy sources be replaced with non reliable energy sources such as wind and solar to generate electricity. The reasoning is that wind and solar don't generate greenhouse gas. They will be backed up by reliable gas fired generators. If one reads the draft document carefully it shows that this is a bad idea but it blithely promotes this as good policy. The report should openly discuss this to encourage the legislature to change to a better energy policy..
3. The report is ambivalent about nuclear energy. It admits that the 2 nuclear plants in CA are valuable but then goes on to discuss all the warts of nuclear energy thus supporting the legislature's view that nuclear is unacceptable. This is strange because nuclear is the only reliable 24/7 energy source that could make a meaningful reduction in greenhouse gas production. The report should

encourage the legislature to accept that if it is serious about greenhouse gas reduction it must remove restrictions on nuclear.

This report should offer the legislature a rational approach to changing state energy policy instead of meekly supporting the status quo. It is a lost opportunity.

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