

To: California Energy Commission
From: Ben Davis Jr., California Nuclear Initiative

Subject: 2014 IEPR update Scoping Order 14-IEP1

California Energy Commission

DOCKETED

14-IEP-01

TN 72766

MAR 07 2014

I hereby request the California Energy Commission add Nuclear Power back to the scope of topics included in the 2014 IEPR update. The specific areas under the heading of Nuclear Power should include all changes that have occurred post Fukushima in California's reliance on nuclear power. Also, the Commission should carefully compile and balance the benefits and risks associated with the use of nuclear power in California. Such a broad reaching study of nuclear power in California is necessary to provide an analytical foundation for regulatory and policy decision-making. Such an in depth and integrated analysis of the nuclear power, which is one of the most current and pressing issues facing the state, has not been included in post Fukushima IEPRs. Such an analysis is also necessary to provide a more informed evaluation of potential trade offs in developing our state's energy policies.

Although the Commission has include nuclear power in its IEPRs since Fukushima, California's need for nuclear power has completely changed since 2011 and the more recent IEPRs do not reflect those changes. This change in California's reliance on nuclear power is a major energy trend and issue facing the state and affecting the balance of supply, demand, pricing reliability, efficiency, and impacts on public health and safety, the economy, resources and the environment. Timely reporting, assessment, forecasting, and data collection concerning this major change in California's reliance on nuclear power are essential to serve the information and policy development needs of the Governor, Legislature, public agencies, market participants, and the public. For such information to be timely it must be included in the most current IEPR process.

Many, if not most, of the recommendations made in the 2011 IEPR concerning nuclear power have not been followed by the CEC, other agencies, or by the state's utilities. Recommendations concerning nuclear power as far back as the 2008 IEPR process have not been completed. Follow through on these recommendations is absolutely necessary in order to provide information that is needed to balance the risks and benefits of nuclear power. That these recommendations were made demonstrates that the CEC agrees these issues are important. To not follow through with the recommendations clearly leaves gaping wholes in the analytic process. Therefore, this IEPR update should include a section on nuclear power.