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**Subject:** FRANK BRANDT COMMENTS TO "Draft 2013 IEPR Scoping Order"  
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Docket number 13-IEP-1A  
FRANK BRANDT COMMENTS TO "Draft 2013 IEPR  
Scoping Order"

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These comments are in response to a call for comments by The CEC. I have made similar comments previously but they should be considered by the CEC before it proceeds on the same old path of previous IEPRs which are always documents confirming the California legislature's concepts about energy in CA. I accuse the legislature of knowing very little about energy sources and the CEC of not helping the legislature in dealing properly with energy sources. This has resulted in the legislature passing laws dealing with energy that are simply bad. AB 32 is a prime example of bad legislation.

I have been reading CEC documents for several years. They are invariably over verbose and do not provide any useful information. For example by reading CEC reports I do not know if CA has sufficient electric power generation capacity. The green people say we have too much capacity. My opinion is that we don't have enough. The CEC never discusses this. I do not know if the ratio of in state vs. out of state electrical generation is proper. I think it is the intent of the CEC to promote new gas fired fossil fueled plants to meet the ever increasing demand for electricity in the state despite the hope that the state will use less fossil fuel. I have never seen a discussion of the value of this promotion. I see an ambivalent attitude about using nuclear energy to generate electricity but never an honest evaluation of the obvious use of nuclear instead of gas to provide reliable power with less CO2 or water vapor. I can observe by weather behavior in San Jose that cloud cover has infinitely more effect on temperature than CO2 but the state is promoting cooling towers

which will send vast quantities of water vapor in to the atmosphere. The state is promoting the use of unreliable energy sources to generate electricity but apparently realizes that gas fired plants are necessary to back them up.. The state decrees less fossil energy use while it promotes fossil energy use. The use of solar and wind cannot replace reliable energy sources but the state persists in promoting them. The state refuses to even consider using nuclear energy.

If the CEC was serious about making a meaningful 2013 IEP all of my questions should be considered because they represent valid doubts about the course that the state legislature is promoting.

Frank Brandt, private citizen  
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