



July 29, 2013

Sent by Electronic Mail

TO: California Energy Commission: [docket@energy.ca.gov](mailto:docket@energy.ca.gov)  
CEC Docket 13-IEP-1D

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FROM: V. John White ([vjw@ceert.org](mailto:vjw@ceert.org))  
Executive Director  
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RE: Comments on Electricity Infrastructure Issues

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The Center for Energy Efficiency and Renewable Technologies (CEERT) appreciated the opportunity to participate at the joint California Energy Commission (CEC) – California Public Utilities Commission (CPUC) Workshop on Electricity Infrastructure Issues related to the closure of the San Onofre Nuclear Generating Station (SONGS) held in Los Angeles on July 15, 2013.

According to California Independent System Operator (CAISO), the replacement power plan for San Onofre can be addressed over the next several years without threat to energy reliability. This presents an opportunity to thoughtfully and carefully create a plan for California's future electricity needs that is cost effective and consistent with the state's short and long-term greenhouse gas reduction goals.

CEERT recommends focusing on the following:

- 1) The plan to replace SONGS must be developed through a transparent process based on current data and sound analysis. To this end, CPUC's Long-Term Procurement Plan (LTPP) Rulemaking (R.) 12-03-014, Track 4, is underway and will provide a public forum to vet and ensure use of accurate, up-to-date modeling and results.
- 2) While this planning process is in progress, California should implement more demand response, energy efficiency, energy storage, and renewable distributed generation programs, particularly in the vicinity of SONGS and the four nearby substations. This will jumpstart the process that the LTPP will eventually put in place.

Following these steps will prevent rushing into the unnecessary investment in new fossil power plants and/or the procurement of new fossil fuel energy sources. Instead, the Commission should continue to focus on those tasks that will move California toward its long-term goals of clean energy and energy flexibility, while maintaining electricity reliability in the short term.