

HC Jay Powell

COOPERATIONS – In the Public Interest, for the Common Good

July 15, 2013

Commissioners and Staff
California Energy Commission and Public Utilities Commission

**RE: CEC–PUC Joint Workshop on Electricity Infrastructure Issues
Resulting from SONGS Closure, July 15, 2013**

Honorable Commissioners and Staff:

I am a member of the Sierra Club, San Diego Imperial Counties Chapter “Run with the Sun” Program Steering Committee and have participated as an intervener representative in past PUC cases regarding the Southwest Powerlink and SDGE conservation programs as well as serving as the founding chairman of the Utility Consumers Action Network. I am retired from 19 plus years as the Executive Director of the City Heights Community Development Corporation, a non profit public benefit corporation providing housing, jobs and neighborhood improvements to one of San Diego’s oldest, poorest and most diverse communities. I am also an owner an operator of 2.5 kw rooftop solar system.

My perspective is to promote an equitable community-based energy system as the fundamental building block for regional sustainability and energy independence and reliability. The testimony provided to the record by CEC staff, CAISO staff, SCE and SDGE all emphasize a macro, centralized, investor owned and regulated, large utility approach that is far too complicated and redundant given the technology that is available and is developing at a rapid pace to become available to homeowners, renters, businesses, property owners and institutions and municipalities.

The analysis provided by SCE, SDGE, CEC and CAISO fails to provide sufficient data regarding an aggressive implementation of energy efficiency, demand response, and local roof top and parking lot solar as critical and first choice measures to pursue in compliance with the State loading order. These measures in conjunction with a responsive energy management system and rapid development of emerging storage technologies that can be applied on a local basis will be far more cost effective and responsive to our future energy needs and the requirements to reduce green house gas emissions.

We should be looking at the permanent shutdown of SONGS not just as a challenge, but as an opportunity to move Southern California rapidly into a sustainable, renewable energy future. There are interim measures that can and probably will be necessary to implement while a local clean energy program is implemented.

If truly the objective is to protect the ocean environment from the impacts of OTC, then the pertinent agencies should consider the fact that SONGS was probably the major OTC consumer of cooling sea water in southern California. Extraordinary volumes of entrained sea life were lost every day of its operation. That has not occurred for the last year and one half and it will not occur ever again. The projected retirement dates for existing OTC power plants should be considered for revision, considering that SONGS has been eliminated as an OTC facility 10 years ahead of schedule. As an example, it may be preferable to continue to operate OTC facilities such as Encina in order to create the necessary bridge to a local clean energy, community-based energy system. This is a much better alternative than creating new fossil fueled power plants that will burden our environment, health, economy and ratepayers for at least another generation.

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With respect to the proposal to accelerate Pio Pico as a response to the SONGS closure, the CEC, PUC, CAISO should consider that Pio Pico is located at the extreme southern limit beyond the SONGS load pocket. At the March 21 hearing earlier this year to consider authorizing contracting for Pio Pico power the PUC indicated to San Diegans that we would have 2 to 3 years to work on an alternative energy scenario that would not include new fossil fueled power plants. Power plant opponents are working with other stakeholders throughout the County to meet that challenge.

One initiative that is being evaluated is to provide a Community Choice Aggregation (CCA) energy district that will emphasize a strong priority and commitment to energy efficiency, demand response and distributed generation from within the San Diego region. The viability of a CCA in San Diego is but in jeopardy by continued investments in utility controlled facilities that rely on utility scale power plants and the consequent necessary transmission upgrades.

In the area of distributed solar generation, SDGE conservative estimates of roof top solar from all sectors is 4,000 MWs. There are other credible estimates of an additional 3,000 MWs PV generation from parking lots covers. The CEC, CAISO and PUC need to consider this potential along with incentive programs that will rapidly accelerate building and appliance retrofits and replacements and use of energy management strategies and equipment as well as accelerating pilot programs to install and evaluate local storage facilities. Using a combination of rooftop and parking lot solar, demand response with energy efficiency, management and storage technologies, urban areas of the San Diego and the Southern California region can literally be a net generator of electric power—literally pushing energy up out of neighborhoods and communities into the distribution and regional transmission grid. This scenario needs to be modeled and evaluated in the analysis underway.

In addition, the PUC should consider other means to carry out an acceleration of these programs. The record of the Investor Owned Utilities (IOU) in promoting these measures is not acceptable given the existing and potential technologies and the combined benefits of far more job creation and greater reduction of green house gas emission impacts from an accelerated commitment to a local clean energy based system.

The analysis being conducted and presented today does not adequately address these options. You are making decisions for the next generation. You have the opportunity to invest in a sustainable future or you can continue to employ the technologies and systems of the last century. We cannot afford the latter. Please provide direction to your respective staffs to develop a local clean energy system for our future.

Please keep me advised of your progress in addressing these issues and I hope you will consider meeting closer to SONGS in San Diego County for additional workshops and hearings on this matter.

Sincerely,



HC Jay Powell

hcjpowell@cox.net

(619) 813-8485

3191 North Mountain View Drive, San Diego, California 92116