



City of Carlsbad

Office of the City Council

August 25, 2014

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 14-IEP-1E
1516 Ninth Street
Sacramento, CA 95814-5512

California Energy Commission

DOCKETED

14-IEP-1E

TN 73715

AUG 27 2014

Commissioner Janea Scott:

Thank you for organizing and hosting the Workshop on Southern California Electricity Reliability held on August 20, 2014. The City of Carlsbad appreciates the efforts of the California Energy Commission, California Public Utilities Commission, California Independent System Operator, California Air Resources Board, and California State Water Resources Control Board to aggressively deal with the dual issues of ensuring the reliability of Southern California's electricity system and achieving the state policy of closing aging once-through cooling power plants located on the coast.

Maintaining regional electricity system reliability and closing aging coastal power plants are critical issues to the City of Carlsbad, the approximately 110,000 people that live here and the thousands that visit each year. These are the reasons the City entered into the agreement with NRG and San Diego Gas and Electric Company (SDG&E) to amend, construct, and operate the Carlsbad Energy Center Project (CECP). That agreement paved the way to retiring and removing the Encina Power Station with its associated biological, water quality, visual, and land use impacts and replacing it with a cleaner, more efficient and responsive generation facility. The result will benefit our region and is consistent with the City's commitment to protect its coastal resources for our residents and all Californians. We strongly encourage the Energy Commission to thoughtfully but expeditiously permit the amended CECP and the California Public Utilities Commission to quickly approve the power purchase contract between NRG and SDG&E for the amended CECP.

Our one concern with the reliability plan being implemented by the Energy Commission and other agencies is the potential to operate both the Encina Power Station and amended CECP at the same time. We understand and agree with the necessity of having contingencies in the event that some of the actions in the plan do not materialize. Our agreement with NRG and SDG&E even anticipates the potential need to operate Encina in the unlikely event that operation of the amended CECP is delayed. But we believe that operation of both the amended CECP and Encina will place significant air quality and other environmental burdens on our



community. We encourage the agencies to be prepared to implement other contingencies identified in the plan rather than exercising the option of simultaneous operation of both power plants.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Mark Packard". The signature is written in a cursive style with a large, looped initial "M".

Mayor Pro Tem Mark Packard