

ATTACHMENT A

CCSF PREHEARING CONFERENCE STATEMENT

April 16, 2002

AIR QUALITY [disputes relate to lower BACT emissions; amount of PM₁₀ emissions; localized PM₁₀ mitigation is inadequate; construction emissions; environmental justice not adequately addressed]

Direct Testimony Estimate: 1 day

Witnesses	Testimony	Exhibits	Cross-Exam Estimate
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<p>Steve Radis, Principal Marine Research Specialists</p> <p>Dr. Phyllis Fox</p>	<p>The proposed NOx limit of 2.5 ppm is not BACT for the gas turbines. NOx BACT for the turbines is a limit of 2.0 ppm averaged over 1 hour.</p> <p>The proposed CO limit of 6 ppm is not BACT for the gas turbines. CO BACT for the turbines is a limit of 2 ppm or less, averaged over 3 hours.</p> <p>Mirant proposes an ammonia slip of 5 ppm. Large combined cycle plants in Massachusetts have been permitted with an ammonia slip of 2 ppm. Slip levels of less than 2 ppm have been achieved in practice. In the FSA the CEC staff states that it “expects” that ammonia slip for the Potrero Unit 7 will be 1 ppm or less.</p> <p>Because ammonia slip leads to</p>		<p>unknown</p>
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AIR QUALITY [disputes relate to lower BACT emissions; amount of PM₁₀ emissions, localized PM₁₀ mitigation is inadequate; construction emissions; environmental justice not adequately addressed]

Direct Testimony Estimate: 1 day

Witnesses	Testimony	Exhibits	Cross-Exam Estimate
	<p>secondary PM₁₀ formation, reductions in ammonia slip are critical. Therefore, CCSF believes that the slip should be limited to 2 ppm or less.</p> <p>The air quality analyses and PM₁₀ offset program assume that PM₁₀ emissions from the turbines/duct burners will be 11 lb/hr per turbine train. GE-guaranteed turbine emissions are 18 lb/hr and total emissions, including duct firing, are 20 lb/hr per turbine train.</p> <p>PM₁₀ air quality impacts have been underestimated.</p> <p>The proposed offset package is not adequate</p> <p>The proposed ERCs must be verified.</p> <p>The environmental justice implications of ERCs from East</p>		

AIR QUALITY [disputes relate to lower BACT emissions; amount of PM₁₀ emissions; localized PM₁₀ mitigation is inadequate; construction emissions; environmental justice not adequately addressed]

Direct Testimony Estimate: 1 day

Witnesses	Testimony	Exhibits	Cross-Exam Estimate
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	<p>Bay plant closures many years ago must be considered.</p> <p>The proposed use of inter-pollutant offsets (use of SO₂ credits to offset part of the PM₁₀ emissions), should not be authorized because of the public health impacts and environmental justice issues.</p> <p>Environmental Justice issues have not been adequately addressed.</p> <p>The PM₁₀ local mitigation proposal recommended by the CEC staff is insufficient.</p> <p>Project construction will result in significant NO₂, PM₁₀, and public health impacts from fugitive dusts and diesel exhaust emissions. The proposed construction mitigation program is not adequate to mitigate these</p>		
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AIR QUALITY [disputes relate to lower BACT emissions; amount of PM₁₀ emissions; localized PM₁₀ mitigation is inadequate; construction emissions; environmental justice not adequately addressed]

Direct Testimony Estimate: 1 day

Witnesses	Testimony	Exhibits	Cross-Exam Estimate
	<p>significant impacts.</p> <p>The demolition of structures on the site will generate thousands of cubic yards of brick and concrete debris. In order to reduce the construction related PM₁₀ impact, as a COC, Mirant should be prohibited from crushing brick or concrete on the site.</p>		

Biology Aquatic and Cooling Options [disputes relate to the impacts of once thru cooling; alternative upland cooling options; mitigations required, if once through cooling is approved; impact on site/offshore remediation]

Direct Testimony Estimate: 4 days

Witnesses	Testimony	Exhibits	Cross-Exam Estimate
	<p>the discharge waters.</p> <ul style="list-style-type: none"> • The sorting and resuspension of contaminated sediments • The potential bottom water entrainment of discharged wastewater effluent particulates • Altered Trophodynamics • Intermittent Heat Treatment • Heat treatment should be suspended during Pacific herring spawning season and known migration movement of other species. • Chemical Impacts <p>Chemical treatment of the intake structures is used to minimize fouling (sodium hypochlorite and sodium thiosulfate). The discharge site should be equipped with a</p>		

Biology Aquatic and Cooling Options [disputes relate to the impacts of once thru cooling; alternative upland cooling options; mitigations required, if once through cooling is approved; impact on site/offshore remediation]

Direct Testimony Estimate: 4 days

Witnesses	Testimony	Exhibits	Cross-Exam Estimate
	<p>continuous chlorine monitor to evaluate complete neutralization of the hypochlorite before discharge.</p> <p>Under Section 66605 of the McAteer-Petris Act there is a feasible upland alternative.</p> <p>Adequate mitigation measures that would directly mitigate the impacts from impingement and entrainment have not been identified.</p> <p>It is unreasonable to construct the CWIS first and then develop mitigation based on the results of monitoring the impacts</p> <p>BCDC proposal to remove Wharf 5 to mitigate the loss of water area and habitat from Bay fill in inadequate. Mirant should be required to pay the</p>		

Biology Aquatic and Cooling Options [disputes relate to the impacts of once thru cooling; alternative upland cooling options; mitigations required, if once through cooling is approved; impact on site/offshore remediation]

Direct Testimony Estimate: 4 days

Witnesses	Testimony	Exhibits	Cross-Exam Estimate
	<p>actual costs of removal of Wharf 5.</p> <p>An upland alternative eliminates the need for the NPDES permit and Thermal Plan variance.</p> <p>Cooling Options</p> <p>The cooling analyses prepared by Mirant and the CEC staff lack sufficient supporting data to allow a detailed review of the assumptions and conclusions.</p> <p>All reasonable cooling alternatives have not been evaluated.</p> <p>The dry cooling design parameters were not optimized.</p> <p>The dry cooling design bases used by Mirant were not</p>		

Biology Aquatic and Cooling Options [disputes relate to the impacts of once thru cooling; alternative upland cooling options; mitigations required, if once through cooling is approved; impact on site/offshore remediation]

Direct Testimony Estimate: 4 days

Witnesses	Testimony	Exhibits	Cross-Exam Estimate
	<p>reasonable. The inlet air temperature selected for San Francisco of 80 degrees is unreasonably high.</p> <p>The hybrid cooling option recommended by the CEC staff appears to be technically feasible. Further evaluation of the impacts, in particular air quality is required.</p> <p><i>See also</i> Waste Management re: site/offshore remediation issuer</p>		

Biology Teresteral [ready to proceed to hearings; potential issues related to cooling system design]

Direct Testimony Estimate: 0 hours at this time

Witnesses	Testimony	Exhibits	Cross-Exam Estimate
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No Witness at this time	No testimony at this time	unknown	unknown
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Cultural Resources [disputes relate to the nexus between the Pier 70 area and the power plant site; mitigation for demolition of historic resources]

Direct Testimony Estimate: 1 day

Witnesses	Testimony	Exhibits	Cross-Exam Estimate
<p>Byron Rhett, Port Director of Planning & Development</p> <p>Mark Paez, Port Planner and Preservation Technical Specialist</p> <p>Charles Chase, Executive Director San Francisco Heritage; Historic preservation representative on the Port's Pier 70 Citizens Advisory Group</p> <p>Other witnesses tba</p>	<ul style="list-style-type: none"> The Pier 70 area shares the same historical context and significance as the power plant site. These two areas collectively form a potential historic district. Contributing to the restoration of historic structures at Pier 70 may mitigate significant impacts caused by the demolition of historic resources on the power plant. CCSF concurs that in accordance with Historic American Engineering Record (HAER) standards, as developed by the US Department of the Interior and the Library of Congress, the resources on the power plant site should 	<p>Ordinance No. 225-92, City of San Francisco</p> <p>Central Waterfront Cultural Resources Survey Summary Report and Context Statement – Prepared by the San Francisco Planning Department</p> <p>Historic Architecture Report – Station A, Ward Hill and Dr. Laurence Shoup, Architectural Historians, Dames & Moore 1999.</p> <p>Historic Architecture Report – 435 23rd Street, Michael Corbett, Architectural Historian, URS Corporation 2001.</p>	<p>Unknown</p>

Cultural Resources [disputes relate to the nexus between the Pier 70 area and the power plant site; mitigation for demolition of historic resources]

Direct Testimony Estimate: 1 day

Witnesses	Testimony	Exhibits	Cross-Exam Estimate
	<p>be recorded prior to demolition.</p> <ul style="list-style-type: none"> • The Meter House and Compressor House are eligible for listing on the National Register of Historic Places and are eligible for the California Register of Historical Resources. • The Meter House and Compressor House are unreinforced masonry structures subject to San Francisco's Unreinforced Masonry Building Ordinance. Under the Ordinance, the buildings must be reinforced or demolished. The demolition of the buildings is a significant effect that must be mitigated. 	<p>Potrero Power Plant Unit 7 Project (00 AFC 4) Final Staff Assessment, Cultural Resources section 5.4</p>	

Cultural Resources [disputes relate to the nexus between the Pier 70 area and the power plant site; mitigation for demolition of historic resources]

Direct Testimony Estimate: 1 day

Witnesses	Testimony	Exhibits	Cross-Exam Estimate
	<ul style="list-style-type: none"> • As mitigation for the demolition of the Compressor and Meter Houses, Mirant should contribute to the restoration of historic resources on Pier 70. • Relocation of these two structures or the installation of an historical information kiosk would be inadequate mitigation for the impact of demolition of significant historic resources. • CCSF supports the COC, provided however, COC Cul-1, Cul-2, Cul-5, Cul-10, Cul-12, and Cul-13 should be modified to include notification to the San Francisco Port in addition to the CPM. 		

Hazardous Materials Management [disputes relate to storage and transportation of aqueous ammonia; compliance with hazardous materials management local requirements; additional COC to avoid inadvertent mixing and to isolate hazardous materials; fuel storage; environmental justice not adequately considered]

Direct Testimony Estimate: 2 days

Witnesses	Testimony	Exhibits	Cross-Exam Estimate
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<p>Richard Lee, MPH SF DPH, Environmental Health Section</p> <p>Sue Cone, Senior Industrial Hygienist, SF DPH</p> <p>Steve Radis, Principal Marine Research Specialist</p>	<ul style="list-style-type: none"> • CCSF supports COC Haz-1 through Haz-6 with modifications. • COC Haz-1 should be modified to prohibit the use of hydrazine (which is highly toxic and flammable) and anhydrous ammonia at the site. • COC Haz-3 should be modified to require that the Safety Management Plan be approved by CCSF. • A COC should be added that hydrogen cylinders shall be stored in an area isolated from potential ignition sources. • The storage of aqueous ammonia will make the Potrero power plant the 	<p>February 2002, Regulated Substances Program Guidance, by SFDPH Hazardous Materials Unified Program Agency</p>	<p>Unknown</p>
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Hazardous Materials Management [disputes relate to storage and transportation of aqueous ammonia; compliance with hazardous materials management local requirements; additional COC to avoid inadvertent mixing and to isolate hazardous materials; fuel storage; environmental justice not adequately considered]

Direct Testimony Estimate: 2 days

Witnesses	Testimony	Exhibits	Cross-Exam Estimate
	<p>largest hazardous materials storage site in San Francisco. This is a significant impact that should be mitigated</p> <ul style="list-style-type: none"> • The risks associated with the transportation of aqueous ammonia are underestimated. • The risks associated with the storage of aqueous ammonia are underestimated. • New processes and technologies may eliminate the need to transport and store aqueous ammonia • Examples include the U2A and AOD urea-based system and SCONOX, an ammonia free NOx control system. Mirant should be required to use these 		

Hazardous Materials Management [disputes relate to storage and transportation of aqueous ammonia; compliance with hazardous materials management local requirements; additional COC to avoid inadvertent mixing and to isolate hazardous materials; fuel storage; environmental justice not adequately considered]

Direct Testimony Estimate: 2 days

Witnesses	Testimony	Exhibits	Cross-Exam Estimate
	<p>systems to eliminate the hazards associated with transporting and storing ammonia in a densely populated urban area.</p> <ul style="list-style-type: none"> • The 75 ppm ammonia exposure criterion used in the AFC is not acceptable to CCSF. The City requires a level of concern of 35 ppm. • Mirant will have to use a modeling program similar to the EPA RMP*COMP program to satisfy CCSF requirements. • The Hazardous Materials Unified Program Agency (HMUPA) of the San Francisco Department of Public Health will not accept the worst case tank release scenario used in the AFC. HMUPA will require 		

Hazardous Materials Management [disputes relate to storage and transportation of aqueous ammonia; compliance with hazardous materials management local requirements; additional COC to avoid inadvertent mixing and to isolate hazardous materials; fuel storage; environmental justice not adequately considered]

Direct Testimony Estimate: 2 days

Witnesses	Testimony	Exhibits	Cross-Exam Estimate
	<p>a worst case analysis that assumes the catastrophic failure or rupture of both the tank carrying the aqueous ammonia and the truck.</p> <ul style="list-style-type: none"> • Sodium hypochlorite and sulfuric acid must be stored to avoid inadvertent mixing with other chemicals. • HMUPA requires a seismic analysis as part of the RMP as well as a "seismic expert certification." • Fuel storage at the Potrero Power Plant; potential hazards. • Environmental Justice issues have not been appropriately considered. 		

Land Use [disputes relate to cooling option; BCDC open space issues; cost of maintenance of open space; contribution for open space; cost of removal of Bay fill; required agreement with SF Port to construct once through cooling system; transmission agreement with SFPUC]

Direct Testimony Estimate: 2 days

Witnesses	Testimony	Exhibits	Cross-Exam Estimate
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<p>Byron Rhett, Port Director of Planning & Development</p> <p>Lynda Swanson, Pier 70 Development Project Coordinator</p> <p>Tom Petersen, General Superintendent Harbor Maintenance</p> <p>Toby Levine, Chair Pier 70 Citizens Advisory Group</p> <p>John Borg, Vice-chair Pier 70 Citizens Advisory Group</p>	<p>Although the proposed power plant site is in an industrially designated area (M-2), the San Francisco's policy is to encourage non-polluting industry.</p> <p>Current San Francisco planning efforts stress the need to link land use to transit and to provide housing and neighborhood services in proximity to transit. The City's investment in 3rd Street Light Rail is being potentially compromised because the presence of an expanded power plant could limit housing production where it is most appropriate - near transit.</p> <p>Mirant should contribute to the development and implementation of streetscape improvements and treatments that would help buffer the</p>	<p>San Francisco General Plan, Environmental Protection Element, Objective 4, Policy 4</p> <p>May 31, 2001 CCSF Comments on CEC Preliminary Staff Assessment for Potrero Power Plant Unit 7, Appendix 3, Pier 70 Advisory Group Memorandum re: Project Impacts and Mitigation Measures.</p> <p>March 4th and 13th 2002 letters from Byron Rhett, Port of San Francisco to Will Travis, BCDC</p> <p>http://www.energy.ca.gov/sit/gcases/contracosta/documents/index.html</p> <p>Port Maintenance Division, preliminary estimates for the long term maintenance of open</p>	<p>Unknown</p>
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Land Use [disputes relate to cooling option; BCDC open space issues; cost of maintenance of open space; contribution for open space; cost of removal of Bay fill; required agreement with SF Port to construct once through cooling system; transmission agreement with SFPUC]

Direct Testimony Estimate: 2 days

Witnesses	Testimony	Exhibits	Cross-Exam Estimate
	<p>proposed power plant from other incompatible land uses in close proximity to the project.</p> <p>BCDC Land Use Issues</p> <p>Section 66602 of the McAteer Petris Act requires that “maximum feasible public access, consistent with a proposed project, should be provided.” The San Francisco Bay Plan policies provide that “[the public] access should be permanently guaranteed ... and be built to encourage diverse Bay related activities and movement to and along the shoreline.</p> <p>CCSF supports the open space proposal recommended by BCDC.</p> <p>Mirant, as a COC, should be required to fund the full \$680,000 recommended by</p>	<p>space</p> <p>Pier 70 Area Preliminary Area Plan Map</p>	

Land Use [disputes relate to cooling option; BCDC open space issues; cost of maintenance of open space; contribution for open space; cost of removal of Bay fill; required agreement with SF Port to construct once through cooling system; transmission agreement with SFPUC]

Direct Testimony Estimate: 2 days

Witnesses	Testimony	Exhibits	Cross-Exam Estimate
	<p>BCDC for capital costs for the open space proposal.</p> <p>Mirant, as a COC, should be required to contribute money for the cost of long term maintenance and capital replacement costs for the open space proposal.</p> <p>The San Francisco Port maintenance staff estimates that the long term maintenance costs of the open space is 8.5% per year of the park's construction costs, rising 2.5% each year in line with general inflation. Capital replacement costs are estimated as 1.5% of the construction costs each year, also rising with inflation.</p> <p>CCSF supports COC Land-3.</p> <p>CCSF supports COC Land-4. Related to future Bay Trail</p>		

Land Use [disputes relate to cooling option; BCDC open space issues; cost of maintenance of open space; contribution for open space; cost of removal of Bay fill; required agreement with SF Port to construct once through cooling system; transmission agreement with SFPUC]

Direct Testimony Estimate: 2 days

Witnesses	Testimony	Exhibits	Cross-Exam Estimate
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	<p>improvements</p> <p>COC Land-5 should be modified to conform with the BCDC Report dated March 27, 2002 to the CEC, provided as noted above, Mirant should be required to contribute money for the cost of long term maintenance and capital replacement costs for the open space proposal.</p> <p>The BCDC recommendation specified that in the event the CEC proposed to certify the once-through cooling facility the resulting Bay fill should be mitigated. BCDC further recommends that this impact be mitigated by including a COC that requires Mirant to pay \$500,000 to the Port of San</p>		
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Land Use [disputes relate to cooling option; BCDC open space issues; cost of maintenance of open space; contribution for open space; cost of removal of Bay fill; required agreement with SF Port to construct once through cooling system; transmission agreement with SFPUC]

Direct Testimony Estimate: 2 days

Witnesses	Testimony	Exhibits	Cross-Exam Estimate
	<p>Francisco for the cost of removing Wharf No. 5 at Pier 70. The Port Engineering Division, which has experience with prior pier removals, estimates that the removal of Wharf No. 5 is at least \$750,000. The Port believes that Mirant should be required to cover the full cost for the removal of the Wharf No. 5</p> <p>The Pier 70 Citizens Advisory Group created by the Port in 2000 for the purpose of providing community input on the Port's planned redevelopment of portions of the larger Pier 70 area abutting the north property line of the Potrero Power Plant. The Advisory Group has devoted a significant amount of time and</p>		

Land Use [disputes relate to cooling option; BCDC open space issues; cost of maintenance of open space; contribution for open space; cost of removal of Bay fill; required agreement with SF Port to construct once through cooling system; transmission agreement with SFPUC]

Direct Testimony Estimate: 2 days

Witnesses	Testimony	Exhibits	Cross-Exam Estimate
	<p>attention to understanding Mirant's proposal and the potential impact the project could have on the Port's development plans as well as the larger Potrero Hill, Dogpatch, Mission Bay and Bayview Hunters Point communities. As a result the Advisory Group held a workshop and developed a set of mitigation measures/community benefits for the CEC to consider in the review and potential certification of the project.</p> <p>San Francisco Port Land Use Issues</p> <p>Mirant requires an agreement with the Port for the construction of intake and discharge structures.</p>		

Land Use [disputes relate to cooling option; BCDC open space issues; cost of maintenance of open space; contribution for open space; cost of removal of Bay fill; required agreement with SF Port to construct once through cooling system; transmission agreement with SFPUC]

Direct Testimony Estimate: 2 days

Witnesses	Testimony	Exhibits	Cross-Exam Estimate
	<p>Mirant requires a license from the Port for its fuel dock and pipeline.</p> <p>Little progress has been made in negotiating the required agreements between Mirant and the Port.</p> <p>Any agreement entered into by the Port and Mirant must be approved by the San Francisco Board of Supervisors.</p> <p>Mirant proposes to enter into an agreement with the Hetch Hetchy Division of the San Francisco Public Utilities Commission for the design and construction of the required transmission line between the Potrero switchyard and the Hunters Point switchyard. No agreement between Hetch Hetchy and Mirant has been approved by CCSF. The San</p>		

Land Use [disputes relate to cooling option; BCDC open space issues; cost of maintenance of open space; contribution for open space; cost of removal of Bay fill; required agreement with SF Port to construct once through cooling system; transmission agreement with SFPUC]

Direct Testimony Estimate: 2 days

Witnesses	Testimony	Exhibits	Cross-Exam Estimate
	Francisco Board of Supervisors must approve the agreement.		

CCSF WITNESSES, TESTIMONY AND EXHIBITS

(PHCS 4/16)

Noise [disputes relate to cooling option; cumulative impacts of construction noise from many projects; minor changes in COC re: notice to residents]

Direct Testimony Estimate: unknown, pending cooling option system outcome

Witnesses	Testimony	Exhibits	Cross-Exam Estimate
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<p>Steve Radis, Principal Marine Research Specialists</p> <p>Neighbor of the Potrero Power Plant</p>	<p>The Traffic & Transportation Section of the FSA at page 5.10-16 lists the following projects that will be occurring near the Potrero power plant and at the same time: MUNI 3rd Street Light Rail, METRO East Light Rail Maintenance and Operation Facility, the Illinois Street Rail-Truck Bridge and the Mission Bay Redevelopment Project (which includes the UCSF research campus, housing, retail stores, a hotel, a public school and police and fire stations).</p> <p>The cumulative impacts of construction noise from these projects may be significant.</p> <p>COC Noise-1 should be modified to require that 1) the letter be sent to all residents and businesses within a one mile radius of the power plant; 2) the letter be translated into</p>	<p>FSA at pages 5.10 - 16</p>	<p>Unknown</p>
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Noise [disputes relate to cooling option; cumulative impacts of construction noise from many projects; minor changes in COC re: notice to residents]

Direct Testimony Estimate: unknown, pending cooling option system outcome

Witnesses	Testimony	Exhibits	Cross-Exam Estimate
	the three dominant languages spoken in the area; 3) and the telephone number for reporting noise complaints be included in the letter.		

Public Health [disputes related to impacts on public health; cumulative impact of sources of pollution; environmental justice not adequately considered]

Direct Testimony Estimate: 1 and 1/2 days

Witnesses	Testimony	Exhibits	Cross-Exam Estimate
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<p>Dr. Rajiv Bhatia Director, Occupational and Environmental Health SF Department of Public Health</p> <p>Jared Blumenfeld, JD, Department Head, San Francisco Department of the Environment</p> <p>Resident(s) of Southeast San Francisco</p> <p>Steve Radis, Principal Marine Research Specialists</p> <p>Dr. Phyllis Fox</p>	<ul style="list-style-type: none"> • There are significant public health issues in Southeast San Francisco. • Air pollution is a large contributor to disease and sickness in Southeast San Francisco. • Southeast San Francisco has one of the highest asthma rates in California. • Southeast San Francisco has one of the highest cancer rates in California. • The public health impacts of particulate air pollution, including cardio-respiratory mortality, cardiac and respiratory hospitalizations, bronchitis, asthma attacks and sick days, are significant. 	<p>Building A Healthier San Francisco: A Citywide Collaborative Community Assessment, 1998 Volume I: Health, Social and Economic Indicators Report (<i>see</i> Asthma, Environmental and Cancer reports)</p> <p>San Francisco General Plan, Environmental Protection Element, Objective 4, Policy 4</p> <p>http://www.epa.gov/superfund/sites/cursites/caccity.htm</p> <p>http://www.dph.sf.ca.us/Reports/DiseaseInjury/bvhuntca.pdf</p> <p>http://geotracker.swrcb.ca.gov/data/</p>	<p>Unknown</p>
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Public Health [disputes related to impacts on public health; cumulative impact of sources of pollution; environmental justice not adequately considered]

Direct Testimony Estimate: 1 and 1/2 days

Witnesses	Testimony	Exhibits	Cross-Exam Estimate
	<p>shutdown emissions, which cause significant health impacts.</p> <ul style="list-style-type: none"> • The PM₁₀ local mitigation proposal recommended by the CEC staff is insufficient to mitigate PM₁₀ impacts over the life of the project. • Environmental health consequences of environmental pollution are important policy issues for San Francisco. • San Francisco has a policy of encouraging non-polluting businesses and industries. • In order to reduce environmental pollution, San Francisco has funded and adopted many new programs and policies. 		

Public Health [disputes related to impacts on public health; cumulative impact of sources of pollution; environmental justice not adequately considered]

Direct Testimony Estimate: 1 and 1/2 days

Witnesses	Testimony	Exhibits	Cross-Exam Estimate
	<ul style="list-style-type: none"> • Many of these programs and policies directly improve the environmental health and reduce pollution in the Bayview Hunters Point and Potrero communities. • Despite the many improvements in the environment, many significant problems persist. • In June 1998, the EPA designated the San Francisco Bay Area as nonattainment for ozone. • The San Francisco shoreline is home to many industries. • As of 1998, 9 facilities had NPDES permits authorizing discharge into the Bay. • The quality of the San 		

Public Health [disputes related to impacts on public health; cumulative impact of sources of pollution; environmental justice not adequately considered]

Direct Testimony Estimate: 1 and 1/2 days

Witnesses	Testimony	Exhibits	Cross-Exam Estimate
	<p>Francisco Bay water is compromised by toxic contamination. Mirant redesigned the cooling water intake structures proposed for Potrero Unit 7 because of the high levels of contamination in the area that was initially proposed.</p> <ul style="list-style-type: none"> • The EPA lists 7 Superfund clean up sites in San Francisco. The Hunters Point Shipyard in on the EPA National Priorities List for clean up. • There are hundreds of sites in San Francisco that contain hazardous agents. A disproportionate number are of these sites are in Bayview Hunters Point and Potrero. • Environmental justice has not been adequately 		

Socioeconomic Resources [disputes relate to the implications of FSA findings of environmental justice populations within close proximity to the power plant and mitigations that are required]

Direct Testimony Estimate: 1 day

Witnesses	Testimony	Exhibits	Cross-Exam Estimate
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<p>Dr. Eugene Coyle</p> <p>Other witnesses tba</p>	<p>The impact of the project on minority and low income residents is underestimated. The added burden on the low income and minority communities caused by the project have not been adequately address.</p> <p>The air quality and public health sections of the FSA do not adequately address environmental justice issues.</p>	<p>Unknown</p>	<p>Unknown</p>
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Traffic and Transportation [dispute relate to cumulative impact of multiple construction projects]

Direct Testimony Estimate: 3 hours

Witnesses	Testimony	Exhibits	Cross-Exam Estimate
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<p>Power Plant Neighbor tba</p> <p>Jared Blumenfeld, Director, SF Dept. of Environment</p> <p>CCSF witness tba</p>	<p>The traffic impact on small businesses will be significant.</p> <p>The cumulative impacts of multiple construction projects including Potrero Unit 7.</p> <p>COC Trans-5 should be modified to include SF Dept. of Parking and Transportation (DPT) as an agency with whom Mirant must consult in preparing the traffic control plan.</p> <p>CCSF supports COC Trans-1 through Trans -10 (subject to the proposed modification of COC Trans-5)</p>	<p>Unknown</p>	<p>Unknown</p>
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Transmission Line Safety and Nuisance [ready to proceed to evidentiary hearings]

Direct Testimony Estimate: 0 hours at this time

Witnesses	Testimony	Exhibits	Cross-Exam Estimate
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No witness at this time	CCSF supports the COC-TLSN-1 through TLSN-4	Unknown	Unknown
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Visual Resources [disputes relate to potential impacts of cooling system design]

Direct Testimony Estimate: 1 hour; unknown as it relates to cooling system design visual impact issues

Witnesses	Testimony	Exhibits	Cross-Exam Estimate
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<p>Joe Boss, Member of the San Francisco Potrero Power Point Advisory Task Force; resident of the Dog patch neighborhood</p> <p>Unknown (related to cooling system options visual impact issues)</p>	<ul style="list-style-type: none"> Nighttime illumination of the power plant will increase the backscatter to the sky. Mirant should, in consultation with community representatives and neighboring property owners, develop and implement a lighting plan to minimize the trespass of unwanted glare visible from residential areas. 	<p>Unknown</p>	<p>Unknown</p>
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Waste Management [disputes relate to remediation of the Potrero site and off shore contaminated sediments; changes to COC to include certain notices to CCSF]

Direct Testimony Estimate: 2 days

Witnesses	Testimony	Exhibits	Cross-Exam Estimate
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<p>Jay A. Ach, Mgr. of Environmental & Regulatory Affairs, Port of San Francisco</p> <p>Cynda Maxon, Sr. Scientist, Battelle Memorial Institute</p> <p>Dr. John Fetzer</p>	<ul style="list-style-type: none"> • PG&E's legal and contractual obligation to remediate the Potrero site. • PG&E's legal and contractual obligation to remediate the sediment lying offshore of the Potrero site. • It is not clear that the modifications to the CWIS and modified construction techniques proposed by Mirant are sufficient to minimize the environmental impacts of dredging the contaminated sediments in the Bay and Islais Creek. • Core sampling conducted in July 2000 revealed significant levels of contamination by PAH compounds in shallow 	<ul style="list-style-type: none"> • URS-Dames & Moore, 2000 • Geomatrix Consultants, 2000, Report of Results, Additional Site Characterization, Potrero Power Plant Site. Prepared for Pacific Gas and Electric Co. April. • URS/Dames & Moore, 2000, Draft Initial Findings Report, Offshore Sediment Sampling, Potrero Power Plant. Prepared for Southern Energy Co. [now Mirant]. September 28. • URS/Dames & Moore, 2001, Final Offshore Sediment Characterization Report, Potrero Power Plant. Prepared for Mirant 	<p>Unknown</p>
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Waste Management [disputes relate to remediation of the Potrero site and off shore contaminated sediments; changes to COC to include certain notices to CCSF]

Direct Testimony Estimate: 2 days

Witnesses	Testimony	Exhibits	Cross-Exam Estimate
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	<p>water sediments. These compounds are presumably derived from the disposal on land or in the Bay of coal tar from earlier power plant operations. The compounds were found at exceedingly high levels (up to 5 per cent sediment dry weight).</p> <ul style="list-style-type: none"> • Introduction of additional contaminated sediments into the water column could occur during trenching for pipe laydown and other construction activities, from turbulent resuspension of sediments associated with the emplacement of discharge pipes on the seafloor, and from entrainment of finer sediments from bottom waters with discharge water. Silt curtains are not 	<p>California LLC. May 18.</p> <ul style="list-style-type: none"> • Fluor Daniel GTI, 1998, Phase II Environmental Site Assessment, Pacific Gas and Electric Company, Potrero Power Plant, San Francisco, California; Vol. I and II, June 1998; Addendum, September 1998. • BCDC, 2002, Staff recommendation on the Commission's Report to the California Energy Commission on the Potrero Power Plant Expansion, March 15, 2002. • Draft Initial Findings Report, Offshore Sediment Sampling, Potrero Power Plant prepared by URS Dames & Moore for Southern Energy Company, 	
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Waste Management [disputes relate to remediation of the Potrero site and off shore contaminated sediments; changes to COC to include certain notices to CCSF]

Direct Testimony Estimate: 2 days

Witnesses	Testimony	Exhibits	Cross-Exam Estimate
	<p>necessarily effective in preventing the redistribution of suspended sediment. Exact procedures that take into account the tidal range and strong currents of SF Bay need to be specified.</p> <ul style="list-style-type: none"> • PG&E's consultant (Geomatrix, 2000; p.30), hypothesized that the dense, non-aqueous, free-phase, PAH liquid encountered in monitoring wells beneath the site was not a threat to the Bay due to a "low permeability ridge" of Bay Mud that Geomatrix claimed existed along the shoreline. The data supporting this hypothesis was limited; the existence of PAH liquid beneath sediments in the Bay indicates that this 	<p>September 28, 2000</p>	

Waste Management [disputes relate to remediation of the Potrero site and off shore contaminated sediments; changes to COC to include certain notices to CCSF]

Direct Testimony Estimate: 2 days

Witnesses	Testimony	Exhibits	Cross-Exam Estimate
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	<p>hypothesis is false. In light of the more recent Bay sediment data (URS/Dames & Moore, 2000 and 2001), Mirant and/or PG&E must address the environmental issues related to the PAH liquid beneath the site.</p> <ul style="list-style-type: none"> • Furthermore, Geomatrix's conclusions regarding the coal tar DNAPL imply that the DNAPL is stable and not migrating. The presence of liquid coal tar DNAPL in Bay sediments indicates that the liquid has migrated in the past and may be continuing to migrate. The migration or potential for migration of DNAPL must be accounted for in both construction plans and site cleanup strategies. 		
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Waste Management [disputes relate to remediation of the Potrero site and off shore contaminated sediments; changes to COC to include certain notices to CCSF]

Direct Testimony Estimate: 2 days

Witnesses	Testimony	Exhibits	Cross-Exam Estimate
	<ul style="list-style-type: none"> • Fluor Daniel GTI (1998) concluded that containment and extraction of DNAPL liquid were the preferred remedial alternatives for addressing the DNAPL issue on the land part of the site and that containment in place (capping) was the preferred remedial alternative for the Bay sediments. It is unclear as to whether PG&E intends to implement these preferred alternatives and whether Mirant's design and construction plans take these future remedial measures into account. • BCDC (2002) did not address contaminated sediment remediation. While PG&E's consultant (Fluor Daniel GTI, 1998) concludes that PG&E must 		

Waste Management [disputes relate to remediation of the Potrero site and off shore contaminated sediments; changes to COC to include certain notices to CCSF]

Direct Testimony Estimate: 2 days

Witnesses	Testimony	Exhibits	Cross-Exam Estimate
	<p>remediate the sediments, BCDC, among other agencies, must approve any remedial action. BCDC may consider capping sediments in place to be inconsistent with the McAteer-Petris Act.</p> <ul style="list-style-type: none"> • The design and/or construction of the CWIS must minimize any further migration of PAH liquid during construction. • The design and/or construction of the CWIS must minimize any further migration of PAH liquid after completion of construction. • CCSF must have a guarantee that construction of the CWIS will not (a) negatively impact existing 		

Waste Management [disputes relate to remediation of the Potrero site and off shore contaminated sediments; changes to COC to include certain notices to CCSF]

Direct Testimony Estimate: 2 days

Witnesses	Testimony	Exhibits	Cross-Exam Estimate
	<p>conditions or limit future cleanup options and/or (b) provide additional routes for PAH liquid to migrate from the site offshore into Bay sediments.</p> <ul style="list-style-type: none"> • COC Waste 2 should be modified to include notification to DPH in addition to the CPM. • COC Waste -7 should be modified to include notification to DPH in addition to the CPM. • CCSF supports COC Waste-9; provided however, it should be modified to include notification to the San Francisco City Attorney in addition to the CPM. • The demolition of 		

Waste Management [disputes relate to remediation of the Potrero site and off shore contaminated sediments; changes to COC to include certain notices to CCSF]

Direct Testimony Estimate: 2 days

Witnesses	Testimony	Exhibits	Cross-Exam Estimate
	<p>structures on the site will generate thousands of cubic yards of brick and concrete debris. This debris will be crushed on site or transported to a recycling plant. In order to reduce the construction related PM10 impact, as a COC, Mirant should be prohibited from crushing brick or concrete on the site. [This issue is discussed in the FSA at page 5.13-8; CCSF also includes it in the Air Quality Section]]</p>		

Water and Soils [disputes relate to the impact of stormwater flows and runoff; *see also* disputes related to Biology Aquatic and Waste Management]

Direct Testimony Estimate: 3 hours

Witnesses	Testimony	Exhibits	Cross-Exam Estimate
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<p>Terence Parr, Principal Environmental Services Consultant</p> <p>Fred W. Krieger</p> <p>F. Charles Newton, Senior Research Scientist, Batelle Memorial Institute</p> <p>CCSF/PUC witness</p>	<p><i>See</i> Biology Aquatic</p> <p><i>See</i> Waste Management</p> <p>Stormwater and other runoff results from pervious areas if the rainfall is intense or if over-watering occurs. If a new or increased stormwater discharge is planned, this discharge may be a "new source" as defined at 40 CFR 122.2 and subject to stormwater permitting requirements (General Industrial Permit). Of particular concern are those storm water pollutants which are listed as causing impairment in the Bay (dioxin, diazinon, copper, PCBs, etc.)</p> <p>The San Francisco pollution prevention program requirements include preventing pollutants of concern from being entrained</p>	<p>San Francisco Public Works Code, Article 4.1</p>	<p>Unknown</p>
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Water and Soils [disputes relate to the impact of stormwater flows and runoff; *see also* disputes related to Biology Aquatic and Waste Management]

Direct Testimony Estimate: 3 hours

Witnesses	Testimony	Exhibits	Cross-Exam Estimate
	<p>by runoff or from otherwise entering the sewer system. Any industrial-type wastes discharged to the sewer system must meet the requirements of the San Francisco pretreatment ordinance.</p> <p>Application for an Industrial Wastewater Discharge Permit is required.</p> <p>The proposed project will increase the demand on the City's limited capacity to treat wastewater and storm water run-off. The increased demand on the City's sewage treatment system could increase the periodic discharge of untreated sewage into the Bay during winter months when the stormwater run-off causes the system to exceed capacity.</p>		

Worker Safety and Fire Protection [ready to proceed to evidentiary hearings]

Direct Testimony Estimate: 0 hours at this time

Witnesses	Testimony	Exhibits	Cross-Exam Estimate
No witnesses at this time	CCSF concurs with the CEC staff testimony and the COC Worker Safety-1 through Worker Safety - 3.	Unknown	Unknown

Facility Design [disputes relate to common modes of failure; implications of massive duct firing]

Direct Testimony Estimate: 4 hours

Witnesses	Testimony	Exhibits	Cross-Exam Estimate
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<p>Ed Smeloff, Assistant General Manager, San Francisco Public Utilities Commission</p> <p>Dr. Phyllis Fox</p>	<p>Potrero Unit 7 is considered a single contingency because two common mode [of] failures have been identified. CalISO has encouraged Mirant to reconfigure the plant so that common mode(s) of failure are eliminated so that the likelihood and severity of an entire plant outage are reduced.</p> <p><i>See issues under Local Systems Effects</i></p> <p>Because of the significant system reliability and flexibility concerns raised by the current design of Unit 7, the redesign is a critical policy issue for CCSF.</p> <p>Implications of massive duct firing</p>	<p>Unknown</p>	<p>Unknown</p>
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Geology and Paleontology [ready to proceed to hearings]

Direct Testimony Estimate: 0 hours at this time

Witnesses	Testimony	Exhibits	Cross-Exam Estimate
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No witness at this time	CCSF supports the CEC testimony and COC Geo-1 and Geo-2 and Pal-1 through Pal-7.	Unknown	Unknown
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Power Plant Efficiency [disputes relate to cooling system design]

Direct Testimony Estimate: 2 hours

Witnesses	Testimony	Exhibits	Cross-Exam Estimate
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Dr. Phyllis Fox	Implications of massive duct firing	Unknown	Unknown
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Power Plant Reliability [disputes relate to redesign to eliminate common modes of failure]

Direct Testimony Estimate: 2 hours

Witnesses	Testimony	Exhibits	Cross-Exam Estimate
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<p>Ed Smeloff, Assistant General Manager, SF PUC</p>	<ul style="list-style-type: none"> See CCSF Facility Design testimony (related to the common modes of failure and the need to redesign Unit 7 to ensure reliability and flexibility) 	<p>Unknown</p>	<p>Unknown</p>
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Transmission System Engineering [dispute relates to approval of agreement to construct transmission line; SI/FS assumptions; implications of planned transmission upgrades]

Direct Testimony Estimate: 3 hours

Witnesses	Testimony	Exhibits	Cross-Exam Estimate
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<p>Barry Flynn, P.E., Principal Flynn & Associates</p> <p>Ed Smeloff, Assistant General Manager, SF PUC</p>	<p>Transmission Upgrades in the Bay Area</p> <p>Based on the work of the San Francisco Study Group, CCSF understands that the following transmission upgrades to the Bay Area electrical system are planned:</p> <ul style="list-style-type: none"> • the upgrade of the 60kV San Mateo-Martin #4 circuit to 115kV; • reconductoring of the underground dips of the 115kV lines between San Mateo and Martin Substations; • the addition of a new 2.4 mile Hunters Point-Potrero 	<p>Unknown</p>	<p>Unknown</p>
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Transmission System Engineering [dispute relates to approval of agreement to construct transmission line; SI/FS assumptions; implications of planned transmission upgrades]

Direct Testimony Estimate: 3 hours

Witnesses	Testimony	Exhibits	Cross-Exam Estimate
	<p>115kV underground cable; and</p> <ul style="list-style-type: none"> the addition of a new 25 mile 230kV transmission line from the Jefferson substation to Martin substation. <p>Transmission Line</p> <p>The underground cables connecting the Potrero switchyard with the Hunters Point switchyard may be constructed by the Hetch Hetchy Division of the San Francisco Public Utilities Commission. There is no final agreement between Mirant and Hetch Hetchy.</p> <p>SI/FS Assumptions</p>		

Transmission System Engineering [dispute relates to approval of agreement to construct transmission line; SI/FS assumptions; implications of planned transmission upgrades]

Direct Testimony Estimate: 3 hours

Witnesses	Testimony	Exhibits	Cross-Exam Estimate
	<p>The SI/FS was conducted assuming the existing Hunters Point units are on-line before the addition of the Potrero Unit 7 and off-line after the addition of Potrero Unit 7. This is a significant assumption, the consequences of which need to be better understood.</p>		

Local System Effects [dispute relates to elimination of common mode of failure; shutdown of the HPPP; the shutdown of Potrero Unit 3; comparing transmission savings with RMR costs; market power mitigation; SI/FS issues re: shutdown of HPPP]

Direct Testimony Estimate: 2 days

Witnesses	Testimony	Exhibits	Cross-Exam Estimate
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<p>Ed Smeloff, Assistant General Manager for the San Francisco Public Utilities Commission</p> <p>Barry Flynn, P.E., Principal, Flynn & Associates</p> <p>Economist tba</p>	<p>The local system effects testimony assumes that the proposed Potrero Unit 7 is the only alternative that would meet the objectives and goals outlined in the testimony, including localized electrical benefits, system reliability and flexibility, the retirement of older and less reliable power plants and the reduction in transmission losses.</p> <p>There are uncertainties as to the likelihood that Potrero 7 will be developed in a manner that provides the benefits identified.</p> <p>Mirant's requirement for a long term power purchase agreement.</p> <p>Uncertainties as to whether Potrero Unit 7 will be built</p> <p>A significant and important</p>	<p>Unknown</p>	<p>Unknown</p>
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Local System Effects [dispute relates to elimination of common mode of failure; shutdown of the HPPP; the shutdown of Potrero Unit 3; comparing transmission savings with RMR costs; market power mitigation; SI/FS issues re: shutdown of HPPP]

Direct Testimony Estimate: 2 days

Witnesses	Testimony	Exhibits	Cross-Exam Estimate
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	<p>policy objective for CCSF is the shutdown of all electric generation at the Hunters Point Power Plant (HPPP). CCSF has had numerous discussions with CalISO, Mirant and PG&E about the shutdown of HPPP and believes there is consensus that HPPP will be shutdown.</p> <p>The San Francisco Ordinance requires the shutdown of Unit 3 as soon as it is no longer needed for electric reliability.</p> <p>Potrero Unit 7 is considered a single contingency because two common modes of failure have been identified (the condenser and cooling water system)</p> <p>Because Unit 7 as currently designed is a single contingency with two common modes of failure, significant policy and system reliability and flexibility concerns are</p>		
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Local System Effects [dispute relates to elimination of common mode of failure; shutdown of the HPPP; the shutdown of Potrero Unit 3; comparing transmission savings with RMR costs; market power mitigation; SI/FS issues re: shutdown of HPPP]

Direct Testimony Estimate: 2 days

Witnesses	Testimony	Exhibits	Cross-Exam Estimate
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	<p>Transmission system peak loss reductions between 42 MW and 102 MW may be a substantial system benefit.</p> <p>The savings estimated appear to be overestimated. Current natural gas prices are just over \$2.00/MMBtu, not the \$4-5/MMBtu used to calculate the savings.</p> <p>In addition, when the savings are allocated over the entire base of PG&E transmission ratepayers, as provided in the Transmission Owner Tariff, the actual savings are approximately 1 percent.</p> <p>The analysis of the projected savings of \$5 to \$8 million per year is incomplete without an</p>		
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Local System Effects [dispute relates to elimination of common mode of failure; shutdown of the HPPP; the shutdown of Potrero Unit 3; comparing transmission savings with RMR costs; market power mitigation; SI/FS issues re: shutdown of HPPP]

Direct Testimony Estimate: 2 days

Witnesses	Testimony	Exhibits	Cross-Exam Estimate
	<p>analysis of the economic cost to ratepayers of the continued operation of Potrero Unit 3 and possibly HPPP because Mirant has designed Potrero Unit 7 as a single contingency with two common modes of failure. The likely RMR costs (based upon historical data) of the continued operation of Potrero Unit 3 and the cost of retrofitting Unit 3 should be included in the local effects section.</p> <p>The CEC Staff, in consultation with CalSO, should require redesign of Potrero Unit 7 to eliminate the two common modes of failure as a condition of certification.</p> <p>SI/FS implications of the integration of the shutdown of the HPPP into the planned and</p>		

Local System Effects [dispute relates to elimination of common mode of failure; shutdown of the HPPP; the shutdown of Potrero Unit 3; comparing transmission savings with RMR costs; market power mitigation; SI/FS issues re: shutdown of HPPP]

Direct Testimony Estimate: 2 days

Witnesses	Testimony	Exhibits	Cross-Exam Estimate
	existing electricity grid.		

Alternatives [disputes relate to elimination of common modes of failure; electricity needs; compliance w/ SF Ordinance 124-01; shutdown of HPPP; transmission and technology alternatives; market power; draft SF Energy Resources Plan]

Direct Testimony Estimate: 3 days

Witnesses	Testimony	Exhibits	Cross-Exam Estimate
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<p>Ed Smeloff, Assistant General Manager, SF Public Utilities Commission</p> <p>Jared Blumenfeld, JD Director, San Francisco Department of the Environment</p> <p>Phil DeAndrede, Chair Potrero Power Plant Advisory Task Force</p> <p>Cal Broomhead, Resource Efficiency Manager, SF Dept of Environment</p> <p>Danielle Dowers, Climate Protection Project Manager, SF Dept of Environment</p> <p>Other witnesses tba</p>	<p>Electricity Demand in San Francisco</p> <p>Shutdown of the Hunters Point Power Plant</p> <p>Alternative Sites</p> <p>Transmission Alternatives (See also Transmission System Engineering)</p> <p>Technology Alternatives</p> <p>a. Demand Side Management b. Distributed Generation c. Renewable Resources d. Alternative Generation Capacities</p> <p>Compliance with SF Ordinance 124-01</p> <p>The San Francisco Energy Plan</p> <ul style="list-style-type: none"> ● Required by SF Ordinance 124-01 ● Purpose: make findings and 	<p>Draft San Francisco Energy Resources Plan</p> <p>Potrero Power Plant Task Force Review of the Draft San Francisco Electricity Resource Plan</p>	<p>Unknown</p>
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Alternatives [disputes relate to elimination of common modes of failure; electricity needs; compliance w/ SF Ordinance 124-01; shutdown of HPPP; transmission and technology alternatives; market power; draft SF Energy Resources Plan]

Direct Testimony Estimate: 3 days

Witnesses	Testimony	Exhibits	Cross-Exam Estimate
	<p>recommendations related to new generation and transmission, conservation, efficiency and renewable alternatives to fossil fuel generation in SF.</p> <p>San Francisco Energy Plan goals</p> <ul style="list-style-type: none"> • Develop Renewable Power • Maximize Energy Efficiency • Assure Reliable Power • Support Affordable Electric Bills • Improve Air Quality • Support Environmental Justice • Increase Local Control Over Energy Resources <p>Draft San Francisco Energy Plan recommendations</p> <p>Implications of market power and alternatives available to limit Mirant's market power</p>		

