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STATE OF CALIFORNIA

Energy Resources Conservation and Development Commission

In the Matter of:)
Application for Certification)
For the San Francisco)
Electric Reliability Project)

Docket Number 04-AFC-01

SAN FRANCISCO COMMUNITY POWER MOTION TO FILE LATE TESTIMONY ASSOCIATED WITH EMISSION OFFSETS AND COMMUNITY MITIGATION FUNDS

San Francisco Community Power ("SF Power") hereby submits this motion to file the testimony provided below. SF Power have been a relatively passive participant in this proceeding to date as a result of our support of a round agreement between the California Independent System Operator, City and County of San Francisco, and community groups that successful conclusion of the San Francisco Electric Reliability Project (SFERP) will lead to the immediate closure of the existing Potrero Power Plant. The shuttering of the Potrero Power Plant remains SF Power's paramount concern in this proceeding, and we strongly encourage the California Energy Commission (CEC) to do everything in its power to effectuate such an outcome.

SF Power requests that the Commission grant this motion for late filing based on the fact that SF Power represents significant numbers of residents and businesses in the potentially impacted area. Through paid memberships SF Power directly represents upwards of 2,000 residential and business members who are located in the Bayview-Hunters Point and Potrero communities. SF Power urges the Commission to balance the weight of procedural requirements against the need for communities heavily impacted by adverse environmental activities to have a voice in this proceeding.

Community Benefits Package Should be Made a Condition of Final Certification

In a separate process to this proceeding, the San Francisco Public Utility Commission (SFPUC) held a series of meetings with community members as part of an effort to craft a "community benefits package" associated with the SFERP.[1] Through this process a number of measures were identified that would produce public health or environmental benefits in or close-by the Bayview-Hunters Point and Potrero communities. As a result of this community consultation, SF PUC committed to providing $1 million in funding to support tree planning and indoor air improvement activities as part of the SFERP project.

The community views SFPUC's community benefits package commitment as just that – a condition that *must* be met as part of final siting of the three combustion turbines.

[1] It should be noted again that the most substantial mitigation "demanded" by the community was the closure of the existing Potrero Power Plant.

In that respect SF Power strongly encourages the CEC to include the community benefits package in the SFERP's final certification requirements.

A Reasonable Package of Particulate Matter Offsets Should be Adopted

SF Power applauds CEC staff's diligence in requiring SFPUC to provide an appropriate level of offsets for small particulate matter emissions ($PM_{2.5}$). Small particulate matter poses significant health care risks to the affected communities, and, due to heavy truck traffic, the two freeways, and both the existing and proposed power plants, provokes constant clean-up of sticky dust from front stoops and back patios in the community.

SF Power has already informally made known our opposition to proposals to invest $800,000 in particulate matter offset funding for fireplace and woodstove retrofits. SF Power is unaware of any accurate inventory of fireplaces and woodstoves in active use in Southeast San Francisco; finds it difficult to believe there are many; and for the ones that do exist and are heavily used wonders whether their owners would be eager to replace them. SF Power is also sympathetic to SFPUC's concern that imposition of a costly offset program could jeopardize the City's ability to fund the community benefits package.

SF Power recommends that the Commission require SFPUC to spend $400,000 on an effective locally-focused offset program. A notable possibility would be to direct these funds to measures that would have the greatest chance of reducing local emissions, such as improving vehicle maintenance by subsidizing tune-ups of older vehicles registered in the neighborhood; an enhanced vehicle scrappage program; or innovative energy management programs oriented towards reducing peak power consumption. Understanding that this is a complex issue, SF Power further recommends that the most appropriate way to identify the specific measures to be funded may be through an "all-party" settlement, lead by SF PUC.

April 19, 2006

Respectfully submitted:

Steven Moss
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San Francisco Community Power