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## San Diego Chapter

The Honorable James D. Boyd  
The Honorable Karen Douglas  
Siting Project Committee  
California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814

July 16, 2009

Re: Carlsbad Energy Center Project (07-AFC-6)

Dear Commissioners,

I am writing to you on behalf of the San Diego Chapter of the Sierra Club, and our over 14,000 members in San Diego and Imperial Counties.

We oppose the licensing of the Carlsbad Energy Center Project in Carlsbad, California (CECP) for the following reasons.

California gets 45% of its electricity from natural gas, making it the state's primary source of electric power and greenhouse gas emissions in the electric sector. Natural gas power plants contribute to local air pollution, especially particulates and VOCs. Current state law requires electric utilities to increase renewable energy to 20% by 2010. The state's Energy Action Plan, the governor's recent executive order and the California Air Resources Board's Climate Protection Plan all call for 33% renewable energy by 2020. A new bill (AB64) would require all utilities to obtain 35% renewable energy by 2020, with a further goal of 50% renewables by 2035. A recent report by staff, California Public Utilities Commission, has stated that if these requirements are to be met, all new electric generation should be renewable. Thus, large-scale development of new conventional natural gas power plants is not compatible with achieving the state's commitments to renewable energy, climate protection and air quality.

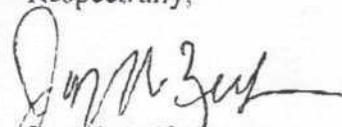
This project will not only diminish air quality, but would diminish air quality in a residential neighborhood. The CECP may be slated to produce less pollution per megawatt hour, but the increased hours it is proposed to run over Encina Units 1, 2, and 3 will impact air quality negatively.

The CECP will require the installation of a desalination unit for plant operations. This will negatively impact ocean wildlife with unnecessary impingement and entrainment.

The energy the plant is proposed to provide can be produced in cleaner, more environmentally responsible way. Future costs for conventional power plants are already much higher than in the past. Recent evaluations by the Energy Commission and others suggest that renewables may already be emerging as a cost-competitive option. In the recent decision on the Chula Vista Energy Upgrade Project (Docket No. 07-AFC-4), expert testimony in the record demonstrated that distributed, thin-film photovoltaic generation could reduce demand by about the same number of megawatts that the Project would generate, during roughly the same periods when peaking generation is most needed, for about the same cost per megawatt.

We hope that the staff's disappointing recommendations in their Preliminary Staff Assessment will be revisited prior to their publishing the project's Final Staff Assessment.

Respectfully,



Joseph A. Zechman  
Chair, San Diego Chapter of the Sierra Club