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DOCKET
07-AFC-6
DATE MAR 25 2011
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Friday, March 25, 2011

In the Matter of)
Application for Certification for the)
Carlsbad Energy Center Project)
(CECP)

Docket No. 07-AFC-6

MOTION TO REOPEN PROCEEDING AND ACCEPT TESTIMONY AND EXHIBITS

Power of Vision concurs with City of Carlsbad and Carlsbad Redevelopment Agency's motion of March 14, 2011 to reopen proceeding and accept testimony and exhibits on issues relating to worker safety, once-through cooling, Caltrans Highway I-5 widening, SP 144 redevelopment, and the Vista/Carlsbad interceptor sewer plant and coastal rail trail.

Furthermore, in view of the recent earthquake and tsunami disaster that has struck Japan, Power of Vision requests that the proceedings also be reopened and testimony and exhibits be accepted regarding the design adequacy of the CECP in regards to earthquakes and tsunamis.

1. CECP's design criteria for earthquakes are based on old analysis that were conducted prior to the advent of three-dimensional seismic reflection mapping and, as highlighted in the Commission's AB 1632 Report of November 2008, may have underestimated the potential earthquake and tsunami hazards.

2. Section 5.4.3.5.7 of the application indicates a maximum tsunami crest of 11-12 feet, while other estimates for the area along the same fault lines indicate crests of 24-25 feet, and these higher values may still be an underestimate according to CEC AB 1632.

3. Section 5.4.3.5.2 indicates a maximum credible earthquake, MCE, (2% probability of being exceeded in 50 years) would result in a ground acceleration of 0.47g and that the design basis earthquake, DBE, (10% probability of being exceeded in 50 years) is 0.27g and that the CECP will be designed for the 0.27g value. It is worth noting that San Onofre Nuclear Generating Station, on the same earthquake fault as CECP, was designed for earth movement of 0.67g and that the Northridge Quake produced ground accelerations of over 1.8g.

4. The berm surrounding the CECP, at elevation 30 ft, consists of untested, possibly uncompacted fill that may be compromised by seismic activity and further eroded by a tsunami surge into Agua Hedionda, allowing sea water to enter the depressed levels of the CECP site and flooding the proposed lower access road. This will further exacerbate

the worker safety hazards in the area, particularly if there is a simultaneous seismic induced gas pipe rupture and fire and no rim road.

Power of Vision appreciates the Commission's review of our request.

Sincerely,

Julie Baker
Arnold Roe, Ph.D.

Cc: Proof of Service

BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT COMMISSION OF THE STATE OF CALIFORNIA
1516 NINTH STREET, SACRAMENTO, CA 95814
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APPLICATION FOR CERTIFICATION FOR THE *CARLSBAD ENERGY CENTER PROJECT*

Docket No. 07-AFC-6
PROOF OF SERVICE
(Revised 1/24/2011)

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DECLARATION OF SERVICE

I, Julie Baker, declare that on ,March 25, 2011, I served and filed copies of the attached Motion in support of Carlsbad to reopen hearing, dated March 25 , 2011. The original document filed with the Docket Unit, is accompanied by a copy of the most recent Proof of Service list, located on the web page for this project at: [http://www.energy.ca.gov/sitingcases/carlsbad/index.html].

The documents have been sent to both the other parties in this proceeding (as shown on the Proof of Service list)
and to the Commission's Docket Unit, in the following manner:

(***Check all that Apply)***

FOR SERVICE TO ALL OTHER PARTIES:

__X_ sent electronically to all email addresses on the Proof of Service list;

____ by personal delivery;

____ by delivering on this date, for mailing with the United States Postal Service with first-class postage thereon fully prepaid, to the name and address of the person served, for mailing that same day in the ordinary course of business; that the envelope was sealed and placed for collection and mailing on that date to those addresses **NOT** marked "email preferred."

AND

FOR FILING WITH THE ENERGY COMMISSION:

__X__ sending an original paper copy and one electronic copy, mailed and emailed respectively, to the address below **(preferred method);**

OR

____ depositing in the mail an original and 12 paper copies, as follows:

CALIFORNIA ENERGY COMMISSION
Attn: Docket No. 07-AFC-6
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512
docket@energy.state.ca.us

I declare under penalty of perjury that the foregoing is true and correct, that I am employed in the county where this mailing occurred, and that I am over the age of 18 years and not a party to the proceeding.

Julie Baker