

Power of Vision

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DOCKET

07-AFC-6

DATE May 17 2011

RECD. May 17 2011

Hearing Officer Paul Kramer
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Re: Docket No. 07-AFC-6
Amendment #2

Dear Mr. Kramer:

Power of Vision inadvertently left out the following document label exhibit 744. I apologize for the inconvenience. Please # the previous document as follow:

1. 745 is the document from the National Propane Gas Association titled National Fuel Gas Code to Consider Chemical Safety Board Recommendation
2. 746 is document titled Notice of Termination of Reliability Must-Run Agreement
3. 747 is the document titled Interim Dual Fuel and Interim Black Start Agreements

Thank you for your consideration.

Sincerely,

Julie Baker

Attachments

POV is dismayed by the lack of inclusion in the PMPD of points raised during the February 2010 Evidentiary Hearings, and by the persistence of errors carried over from the FSA into the PMPD. For example, Table 3 on page 14 of the GHG section of the PMPD indicates that the Otay Mesa, Orange Grove, and Lake Hodges power stations are “under construction”, whereas Otay Mesa came on line in October 2009, Orange Grove came on line June 2010

POV reiterates its concerns regarding the analysis of the potential earthquake and tsunami hazards to CEPC. CEPC is required to provide building plans reflecting seismic design forces that meet the requirements of the California Building code of 2010 or any later revision made not less than 180 days prior to the submission of building plans. However, the relevant sections of the 2010 California Building Code are based on seismic and tsunami evaluations made many years ago, and as pointed out in the November 2008 CEC Report CEC-100-2008-009-CMF and the CEC 2008 IEPR Update, CEC-100-2008-008-CMF, modern off-shore fault survey techniques are likely to indicate greater earthquake and tsunami effects than previously indicated. This is a general conclusion of the two reports, irrespective of the fact that the reports were commissioned to examine the safety of California’s two nuclear power stations.

It is noteworthy that in July 2007 the Kashiwazaki power plant on Japan’s western coast was struck by an earthquake that shook the ground as much as two and a half times the maximum intensity envisioned in the plants design, necessitating the shut-down of the plant for a multi-year period in order to reinforce the plant’s structures. It is also noteworthy that CEPC’s seismic structural design criteria (0.27g) were exceeded almost seven times (1.8g) by the ground movement during the Sylmar earthquake.

Since CEPC is supposed to provide an important source of local power in the event an earthquake affects transmission line facilities to the region, any potential shutdown of CEPC during an earthquake could have serious consequences. POV therefore urges the Commission to require the applicant to conduct additional investigations into the potential hazards to CEPC from earthquakes and tsunamis.

POV requests that the November 2008 CEC Report CEC-100-2008-009-CMF be entered into the record as Exhibit 744.



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 May 17, 2011, I served and filed copies of the attached Power of Vision May 19 Evidentiary hearing document. 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 document has 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:

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

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AND

For filing with the Energy Commission:

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