



**OFFICE OF THE CITY COUNCIL**

**PAMELA BENSOUSSAN  
COUNCILWOMAN**

January 16, 2014

President Michael R. Peevey and Commissioners  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102  
Via email

[mp1@cpuc.ca.gov](mailto:mp1@cpuc.ca.gov), [Carla.peterman@cpuc.ca.gov](mailto:Carla.peterman@cpuc.ca.gov), [catherine.sandoval@cpuc.ca.gov](mailto:catherine.sandoval@cpuc.ca.gov),  
[mike.florio@cpuc.ca.gov](mailto:mike.florio@cpuc.ca.gov), [mark.ferron@cpuc.ca.gov](mailto:mark.ferron@cpuc.ca.gov)

**Re: Request to Deny Application 13-06-015 for Pio Pico Energy Center**

Dear President Peevey and Commissioners,

I write today to urge your denial of Application 13-06-015 of San Diego Gas and Electric (SDG&E) for the Pio Pico Energy Center, which would be located in our region in a community already violating air quality standards. This important decision should be made in the context of a comprehensive regional assessment and state climate goals, and cleaner alternatives should be adequately evaluated.

I support the Commission's mission to ensure safe, reliable electric service at reasonable rates while meeting the state's loading order and using a science-based, comprehensive planning process. It is for these reasons I urge you to deny SDG&E's un-timely request, which did not give fair opportunity for cleaner and less expensive alternatives to compete, and is outside of the Commission's comprehensive planning process. This project could unnecessarily cause significant ratepayer expense and lock our region into paying for decades for an outdated, polluting technology.

I am concerned the closure of SONGS is being misused to justify the reapplication of Pio Pico without consideration for the Commission's Long-Term Procurement Plan process to comprehensively assess SONGS replacement and without due consideration for more appropriate solutions like lower-cost voltage support and transmission fixes in the vicinity of SONGS, increased efficiency, clean energy, and energy storage. The Commission already denied SDG&E's Pio Pico application earlier this year due to lack of need through 2018 and it should not reverse this decision, especially not outside of the context of other comprehensive planning processes and state mandates.

Unfortunately the Pio Pico proposal repeats a familiar pattern of concentrating the region's polluting activities in the South County. A major concern for my constituents is that Pio Pico would not meet the proposed U.S. EPA carbon standards for new power plants and would add significant pollution to a zip code already identified by CalEPA as one of the most impacted areas in the state

for cumulative pollution burden. The U.S. EPA reports Pio Pico will be a major source for GHG emissions at 685,626 tons CO<sub>2</sub>e per year and will emit NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> in significant amounts. In my opinion, there is no defensible rationale to add this pollution to an area where fine and coarse particulate matter levels already violate California standards. We are already experiencing disruptive impacts of climate change like heat waves and wildfires. Furthermore the California Air Resources Board AB 32 Plan states that complying with the State's long-term climate goals will require transitioning to carbon-free energy sources.

Lastly, I am concerned about the impact this project may have on future efforts of our city and other entities to aggregate and otherwise secure clean energy for our communities. The Commission should not allow this project to undermine community choice by those entities that wish to pursue it.

I ask the Commission to deny SDG&E's Pio Pico application and instead use the closure of SONGS as an opportunity to protect public health and move our region towards a cleaner, more stable energy and climate future through a comprehensive planning process and pollution-free strategy to address our region's energy needs.

Sincerely,

A handwritten signature in cursive script that reads "Pamela Bensoussan". The signature is written in dark ink and is positioned to the left of the typed name.

Pamela Bensoussan  
Chula Vista City Councilwoman