



August 27, 2010

Chairman Willrich and Board of Governors
 California Independent Systems Operator
 151 Blue Ravine Road
 Folsom, CA 95630

RE: Environmental Health Coalition (EHC) request for DENIAL of RMR from remaining South Bay Power Plant Units.

Dear Chairman Willrich and Governors:

Environmental Health Coalition (EHC) has previously written to you to urge removal of the RMR from South Bay Power Plant (SBPP). In our letter of July 1, 2010 to you we sought responses to several questions but have yet to receive any written responses.

However, we would like to offer the best analysis we have been able to prepare using the information from ISO available to us and we believe it shows that without the SBPP there is significant excess of generation in the region-- even without the Sunrise Powerlink coming on-line.

Regional Energy Demand and Resource Profile 2011 and beyond

	Megawatts (Mw)	Source
2011 Available resources (minus Otay 603 Mw)	3421 Mw	ISO 2011 Local Capacity Analysis
2011 Worst case demand	3146 Mw	ISO 2011 Local Capacity Analysis
Current Surplus without DR	+ 275 Mw	
Minimum Demand Response	+ 85 Mw	ISO San Diego Load 2010 Load and Resource Profile
Amount over demand for 2011	+ 360 Mw	
Closure of SBPP Units 1, 2 and	- 309 Mw	Community desire to close old, inefficient power plants in South Bay neighborhoods
Surplus AFTER closure of South Bay Power Plant	+ 51 Mw	Excess in 2011
SDGE Smart Meter benefit	Add 208 Mw	Benefit in 2012
If Sunrise is built (+1000 Mw)	Add 1000 Mw	Projected for 2012 or 2013 if constructed

We would also like to point out that this analysis does not include:

- any credit for solar in place (>50 Mw in region and growing at 1.8 Mw a month),

- reductions in demand from efficiency programs that are proliferating in San Diego,
- new cogeneration or stationary fuel cells deployed in the region,
- any ability to operate turbines on new power plant independently,
- Celerity contract (25 Mw), or
- any new demand response since 2009.

Our community was told in 1999 that all we needed to do was provide replacement energy in the South Bay for voltage support (the then stated sole purpose for the RMR designation). That was accomplished through substation and transmission line upgrades, Otay Mesa Generating Station, and multiple new peakers that have been located in South Bay. The chart above shows that we are well in excess of the generation needs of the region even prior to the loading ording being fully implemented in our region.

But instead, we hear that now there are, again, new ‘benchmarks’ for our region to meet and until then staff claims the SBPP will be needed for years longer. It appears that our efforts to restore San Diego Bay’s sensitive natural resources and Chula Vista’s desire to redevelop their industrial bayfront to improve the regional economy will continue to be held hostage by the ISO with no end in sight.

Environmental Health Coalition asks again that, in light of the excess generation in the region, the unprecedented unified political and community opposition to the plant, and grossly disproportionate concentration of energy generation in the South Bay, the Board of Governors consider our plight and deny an RMR designation for the remaining units of the SBPP at your September meeting.

Frankly, the ISO owes this community no less.

We will be in attendance at the September meeting and look forward to presenting our concerns to you directly. Thank you very much for your consideration.

Sincerely,



Laura Hunter
Associate Director of Programs
Environmental Health Coalition

cc.

Congressman Bob Filner
Senator Denise Ducheny
Assemblywoman Mary Salas
Assemblyman Marty Block
Mayor and City Council of Chula Vista
Board of Port Commissioners
State Lands Commission