

Stakeholder Comments Template

Subject: Generator Interconnection Procedures Straw Proposal and Meeting

Submitted by	Company	Date Submitted
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As a stakeholder in the CAISO proposal to modify the small generator interconnection procedures (SGIP), I appreciate the opportunity to provide the following comments.

I do not believe the CAISO straw proposal to combine the SGIP and the large generator interconnection procedures (LGIP) into an annual cluster study process and interconnection procedure improves the existing SGIP process.

Small local generation is and should be the way of the present and the future. Optimizing small local generators' ability to compete with large generators both promotes a more democratic grid and improves grid reliability.

Small local generation benefits reliability in providing solutions to local constraints and in providing more options to respond to failures such as localized thermal overloads, voltage collapse, and generator outages.

For the present, large generation remains a necessary part of the grid in California. But large generators and the massive amounts of transmission needed to wheel generation to load are undesirable for two reasons and should be avoided whenever possible: (1) Large centralized generation and accompanying long bulk transmission lines have large environmental footprints. And (2) Large generation and transmission negatively impact the human population, disrupting the lives of property owners, both small and large, and residents where large generators are located and transmission is routed.

Since the environmental footprint of centralized generation has been discussed considerably, I will limit my comments to how centralized generation continues—now with much less justification due to emerging technologies—to impact less affluent human populations.

In the past, if we wanted the conveniences electricity provides an increasingly industrialized society, large-scale generation was the only solution. The large footprint

of the centralized system was unavoidable; it was necessary to impact the lives of thousands of people to bring power to millions.

However, as the new technologies of distributed generation and storage become more and more available and more affordable, the large-scale solution is no longer the only solution. Now distributed generation makes it possible to provide the necessary power without negatively impacting so many people. We can now treat the thousands fairly and still serve the millions.

Therefore, planning must evolve along with the technology. It is no longer sufficient to base planning solely on reliability and economics. It is now necessary also to plan for the least possible impact on human populations.

In the past, electrical facilities have been located near human populations least able to oppose such placement. Nearly a century ago, Huntington's Pacific Light and Power (later purchased by Southern California Edison Company) located the lines of the Big Creek Project through ranch land of the Sierra foothills and Transverse Range to power Huntington's electric rail in the Los Angeles area. Many landowners and residents did not want these lines located on their property, but they did not have the financial wherewithal to fight an extended court battle with one of the wealthiest corporations on the planet. These ranchers were forced to sacrifice their property at bargain basement prices so that Southern California and a few exorbitantly wealthy investors could benefit in a scheme that deserves to be called nothing less than energy colonization.

In the 1980's, PG&E completed the Helms-Gregg 230 kV through the Sierra foothills to connect the Diablo Canyon Nuclear Plant with the Helms Pumped Storage Plant. A rancher I know spent a considerable amount of money opposing the routing of this line, but to no avail. Construction required the removal of hundreds of blue oaks and other flora along the route. To add insult to injury, not only were the oaks killed, they were stolen and sold as firewood (estimated at about 200 cords by the rancher) by workers who had keys to PG&E locks on the gates to the rancher's property. There were more depredations, including poaching of deer and other game.

Energy colonization continues today with plans for large renewables projects in remote areas of Southern California and long transmission lines to bring their generation to load centers hundreds of miles away. The Ivanpah plant near the California-Nevada border is an example that may be unnecessarily replicated many times over in the next few years in Southern California. Another example can be found farther north, in one of the forgotten corners of California. A large combined-cycle natural gas generator was recently approved by the CEC near Avenal, in western Kings County. Avenal is a town of mostly Spanish speaking farm workers. These people's lives are so busy providing their families with the basic necessities of survival that they hardly have time to notice yet another ugly polluting project being located near them along what has been called "California's back alley" so as not to locate it near more affluent areas inhabited by more wealthy stakeholders who enjoy most of the benefits of such projects, both as users of the electricity and as investors.

This sort of inequitable behavior on the part of energy planners and regulatory and permitting agencies is no longer necessary or acceptable. It is now possible for load centers to generate much of the electricity they need where they need it—on industrial rooftops, on parking facilities, on brownfields rendered uninhabitable by chemical pollution.

In the past, society externalized many of the costs of providing electricity to the more affluent onto the less affluent. Maintaining a robust Small Generator Interconnection Procedure is one way to encourage more localized generation so that the affluent can serve their needs without negatively impacting the lives of the less affluent. A robust SGIP will help do away with energy colonization and serve social diversity, fairness, and democracy.

Respectfully submitted,
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