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CITY OF PITTSBURG
PLANNING DEPARTMENT

Mr. Ken Strelo
Project Planner
Planning Department
City of Pittsburg
65 Civic Avenue
Pittsburg, California 94565

Re: Trans Bay Cable Project, Draft Environmental Impact Report (DEIR)

Dear Mr. Strelo:

San Francisco Community Power (SF Power) hereby submits the following comments on the above-cited DEIR:

(1) *The draft EIR's screening criteria are tautological.* For example, Screening Criteria Number 1, Project Objectives, indicates that a key objective is increasing transmission system reliability in San Francisco by providing an alternative transmission pathway into the area. This criteria by its very nature reduces the value of potentially more cost-effective and beneficial alternatives to meeting San Francisco's *energy* reliability needs. All else held constant, the impacted parties – San Francisco's residents and businesses – are indifferent as to whether electric system reliability is ensured through generation, transmission, or demand management approaches. These stakeholders simply want appropriate reliability levels. Further, on a megawatt per megawatt basis, multiple, dispersed, non-transmission approaches, such as distributed generation, would provide far more electric reliability capacity than large-scale single projects, such as the Trans Bay Cable (TBC).

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(2) *The draft EIR's "Alternatives Analysis" is inadequate,* as follows:

- *The draft EIR does not consider transmission alternatives, even though several transmission projects into San Francisco, which have the potential to provide additional capacity at lower cost and with greater benefits than the TBC, have been proposed.* For example, the California Independent System Operator (Cal-ISO) identified a number of transmission alternatives in its 2004-2006 transmission planning study process; and the San Francisco Public Utility Commission has likely examined potential

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transmission projects as part of its Community Choice Aggregation development plans.

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- *The draft EIR does not seriously consider significant alternative in-City electricity capacity sources.* These notably include “distributed energy resources,” such as enhanced energy efficiency measures; demand-response programs; load-shifting initiatives; micro-turbines; fuel cells, and small-scale storage devices (e.g., ice machines; compressors; batteries). Available evidence, and City and County of San Francisco energy policies, indicates that an additional 200 MW of DER-related capacity could be obtained by 2010, essentially eliminating the need for the TBC until 2018 or later.

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- *The draft EIR provides an inadequate analysis of solar potential.* The document provides no analytic support for its assertions related to the amount of space required for photovoltaic (PV) facilities; excludes consideration of the large number of public and private sites that would be suitable locations for PV; and implies that solar generation’s ability to produce electricity during daylight hours is a significant liability, when under any circumstances over the next decade the only plausible need for the TBC is during peak hours – exactly when solar is likely to be producing the greatest amount of electricity. The draft EIR also mysteriously asserts that solar would induce “the need for overhead or underground transmission interconnection to the electrical grid,”¹ when in fact this is only the case for large projects, and need not present a significant barrier.

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- *The draft EIR provides no analytic basis for its elimination of demand management strategies as a viable alternative.* The draft EIR states that “the development of this [demand management] option is beyond the capability and control of the proponents of the proposed Project”² Yet the parties responsible for paying for the project – investor-owned utility ratepayers – are fully able to develop this option, through the same mechanism that will be used to finance the TBC – California Public Utility Commission-endorsed utility rates.³ Likewise, the draft EIR asserts that “this alternative is likely not a feasible alternative to the Project because available energy savings from DMO programs are insufficient to supply necessary long-term needs” without presenting *any* evidence to support this statement, and with ample data available to indicate the contrary.

¹ Section A.8.3.5.13.

² A.8.3.5.15.

³ Though the TBC escapes CPUC jurisdiction because of its location in a municipal utility’s service territory. As a result, unlike virtually every other significant project paid for by California IOU ratepayers, the TBC will not be subjected to examination by any governmental agency that has at its core mission the protection of energy consumers from economically disadvantageous projects.

- *The draft EIR provides no basis for its elimination of distributed generation (DG) strategies as a viable option. The draft EIR states that "...it is likely not yet technically feasible to construct and operate sufficient quantity [of DG] to meet project demand"*⁴ without providing *any* data related to how much demand might have to be met at what date by the TBC, DG, or other energy resources; or any indication that any of the voluminous data developed by the California Energy Commission and others related to DG's cost-effective potential to provide beneficial capacity have been examined.

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SF Power also notes that the DEIR indicates that the TBC would induce at least one unavoidable adverse impact – the demolition of historic resources in San Francisco (i.e., the last two remaining 1920s Western Sugar Refinery warehouses). These buildings are eligible for the California Register of Historical Resources, and are considered historic resources by the nearby Dogpatch neighborhood, which itself is a historic resource. The DEIR's proposed mitigation measures – taking photographs of the building – would provide virtually no actual mitigation. Photographic images or drawings cannot substitute for a tangible, usable historical asset.

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Sincerely,



Steven Moss
Executive Director

⁴ A.8.3.5.15.