

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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Order Instituting Rulemaking to
Establish Policies, Processes, and
Rules to Ensure Safe and Reliable Gas
Systems in California and Perform
Long-Term Gas System Planning.

Rulemaking 20-01-007
(Filed January 16, 2020)

**CALIFORNIANS FOR GREEN NUCLEAR POWER'S
COMMENTS IN RESPONSE TO THE PHASE 2 SCOPING MEMO AND
RULING**

Gene Nelson, Ph.D. CGNP Senior Legal Researcher and President
Californians for Green Nuclear Power, Inc. (CGNP)
1375 East Grand Ave Ste 103 #523
Arroyo Grande, CA 93420-2421
(805) 363 - 4697 cell
Government@CGNP.org email
<https://CGNP.org> website

March 13, 2024

I. INTRODUCTION

Californians for Green Nuclear Power (CGNP) respectfully submits these comments in response to the Commission's Order Instituting Rulemaking, issued January 20.

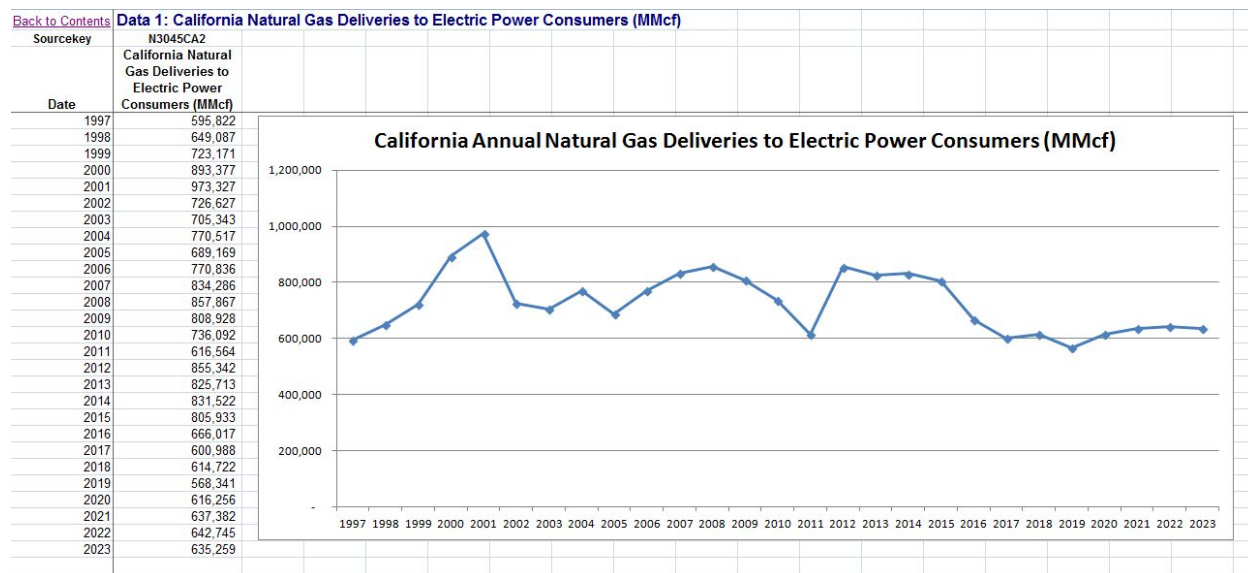
CGNP is an all-volunteer non-profit association of scientists, educated at top universities, considered to be specialists in their fields, each with decades of experience in energy, nuclear power, and environmentalism. CGNP's experts became involved before the Commission because they wish to help California make wise decisions for the benefit of future generations.

II. COMMENTS

CGNP's President and Senior Legal Researcher attended and provided public comments at the recent California Senate Energy Utilities and Communications Committee and the California Assembly Utilities and Energy Committee hearings in Sacramento. Both of those hearings were held as part of the system of "checks and balances" in the State of California to provide feedback to the Commission, which is an executive branch agency. There were many comments from both the legislators, the parties on the dais, and the public critical of the abnormally high rates for both gas and electric service in California.

The policy change since about 2010 has been to advocate for massive expansion of unreliable solar and wind generation in California despite the very high cost of integrating those power generation means into the California power grid. The engineering reality is that California natural gas fired generators are now being operated in an intermittent and inefficient fashion to accommodate the massive increase in solar and wind generation. Despite the investment of tens of billions of dollars for installing unprecedented amounts of solar and wind

generation, there has not been a statistically-significant decrease in the consumption of natural gas for California electricity generation. This is shown in this tabulation and graph of natural gas consumption for California electricity generation compiled by the U.S. EIA ¹ :



CGNP believes this information calls into question the cost-effectiveness of the tens of billions of dollars expended on solar and wind generation to date.

Furthermore, there are significant power engineering considerations that appear to have been ignored in the push for more California solar and California wind. ² For these reasons, the premises behind this Proceeding are overdue for re-examination.

¹ <http://www.eia.gov/dnav/ng/hist/n3045ca2a.htm>

² "Why is Grid Inertia Important?" by Gene Nelson, Ph.D. March 4, 2024, GreenNUKE Substack <https://greennuke.substack.com/p/why-is-grid-inertia-important>

Respectfully submitted on March 13, 2024

/s/ Gene Nelson, Ph.D. CGNP Senior Legal Researcher and President
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