

TO: California Public Utility Commission
FROM: Californians impacted by San Onofre

February 21, 2013

Please address these urgent demands. It's time to put the needs of the ratepayers and citizens of California above the profits of Southern California Edison and SDG&E.

ONE: The CPUC should immediately refund and stop forcing ratepayers to pay billions of dollars for Edison's mistakes and stop all future ratepayer funding of San Onofre.

- We demand refunds for all costs associated with the four defective steam generators.
- The CPUC has enough information to act now to cut off ratepayer funding for any further operations of San Onofre. And the CPUC has previously determined that Edison's proposal to operate only one defective reactor is not cost-effective.
- The CPUC should order refunds for excess charges for the purchase of replacement power after San Onofre broke down in January 2012.

Facts Supporting our Demands

- We did not agree to pay for defective steam generators. Nuclear reactor Unit 2 and 3 steam generators have decades of wear after less than two years of operation; one leaked radiation after less than one year.
- Independent experts and a report by the Nuclear Regulatory Commission show that Edison's redesign caused the steam generators to fail.
- Edison appears to have known about the flawed design prior to installation of the steam generators, according to a Mitsubishi report reviewed by Senator Barbara Boxer and U.S. Rep. Ed Markley.¹
- We have surplus power WITHOUT San Onofre and California has plans to take us through more hot summers without San Onofre.

TWO: It's time to take Governor Brown's goal of clean renewable energy and energy efficiency seriously. We can accelerate the effort and make California the world's clean energy leader by eliminating the money pit of California nuclear power.

- California could have cleaner, cheaper and more reliable power without San Onofre. San Onofre is old and unreliable. We can never depend on it and should instead invest in clean energy and energy efficiency. And the CPUC should plan replacement resources in a transparent process.
- Energy efficiency would lower costs in the short-term and renewable energy would keep costs low in the long-term, while gas and nuclear costs will only continue to escalate.
- Clean resources would accelerate California job growth.
- California should convene an interagency Working Group to determine in a public transparent process how to use targeted clean resources and energy efficiency to replace San Onofre's lost power, particularly energy efficiency, demand response, rooftop solar and storage.
- A November 2012 decision in CPUC's energy efficiency case ordered Edison and SDG&E to use efficiency to replace San Onofre — but it lacked any details.
- In February 2013, for the first time ever, CPUC's decision in the Long-term procurement case ordered Edison to use efficiency, demand response and local renewables to offset the need for local power supplies — but it put Edison in charge of figuring out how to make that work. Edison

¹ NRC asks Mitsubishi for report on San Onofre equipment issues (LA Times 2/15/2013)
<http://articles.latimes.com/2013/feb/15/local/la-me-0215-san-onofre-20130215>

has obvious conflicts of interest, so the Commission should launch a public process with independent experts. Edison should NOT be in charge of this process.

THREE: Any cost benefit analysis of whether to restart San Onofre must include the economic impact of a major disaster at San Onofre.

- Given the demonstrated mismanagement and incompetence of Edison in the steam generator redesign, this is a real possibility. In addition, Edison has the highest rate of safety complaints from employees and the highest rate of retaliating against employees who report safety problems to the NRC.²
- A nuclear disaster at the San Onofre nuclear power plant could shut down both the Long Beach and Los Angeles ports and possibly other ports in California, resulting in hundreds of billions of dollars to the local and national economy and affecting millions of jobs.³ This alone should be enough to show the defective nuclear plant is not worth the risk to the California or national economy. More than 40% of containerized imports enter the country through California ports, and nearly 30% percent of the country's exports depart through them. More than three million jobs across the country are linked to California's public ports.
- California is the top agricultural state in the nation, with cash receipts of \$43.5 billion.⁴ Crops could become worthless with a failure at San Onofre.
- 50 miles is the distance the Nuclear Regulatory Commission recommended for evacuation after the Fukushima-Daiichi disaster. Some of the priciest real estate in the country is within 50 miles of San Onofre. Those homes and businesses could instantly become worthless forever and the residents could become a costly burden to the state.

FOUR: San Onofre should be decommissioned.

- The potential billions of dollars required to retrofit or remediate San Onofre for once-through-cooling will be unnecessary if the plant is shut down. In addition to saving money, this will finally stop San Onofre from killing and maiming billions of sea creatures every year.
- \$64 million for seismic testing is unnecessary. We already know San Onofre is not designed for current earthquake risks.
- The Nuclear Regulatory Commission has no solution for permanent storage of nuclear waste. San Onofre has tons of radioactive waste unsafely stored near our beaches and our population of over 8.5 million people. We need to stop making more of it.

FIVE: CPUC should prevent Edison from spreading misinformation.

- At the very least, at the beginning of every public meeting, CPUC should require Edison to reveal the amount of any gifts, meals or other compensation the company or its allies made to any speaker or group that comes to the meeting to support Edison's position. Those people should speak last, after all the unpaid and ungifted members of the public have had a chance to speak.
- The CPUC should require Edison to disclose all propaganda material given to local and state citizens, groups, businesses, governments, and schools. The information should be reviewed and vetted.

² <http://sanonofresafety.org/>

³ Pacific Merchant Shipping Association <http://www.pmsaship.com/default.aspx?ID=8>

⁴ CA Agricultural Statistics 2011

[Shttp://www.nass.usda.gov/Statistics_by_State/California/Publications/California_Ag_Statistics/Reports/2011cas-all.pdf](http://www.nass.usda.gov/Statistics_by_State/California/Publications/California_Ag_Statistics/Reports/2011cas-all.pdf)