

A Summary of Citizen Comments Filed with MPSC Regarding HBPW's EGAA (Comment Period Ends June 8 2010)

January 2007 – HBPW asks DEQ for permission to increasing JDY from 60 MW to 128 MW.

April 2009 – DEQ asks HBPW for EGAA (Energy Generation Alternatives Analysis)

DEQ asks for alternatives that might reduce air pollution including CO₂, specifically asking for programs that aim to reduce demand through energy conservation, energy efficiency, and distributed generation and for energy production through renewable and/or less polluting fuels.

<http://www.deq.state.mi.us/aps/downloads/permits/PubNotice/25-07/25-07%20Alternative%20Analysis%20Request%20Ltr.pdf>

April 2010 – HBPW submits to MPSC its EGAA (350+ pages).

This analysis projects the demand for electricity in HBPW service area for the next 20 years assuming:

- No demand reduction programs beyond the minimum required by law through 2015.
- Addition of two high demand battery plants over the next few years.

This analysis considers 6 alternatives for meeting the projected demand.

- 5 alternatives involving various combinations of coal (50-100%), natural gas, and biomass fuels with the 20 year cost of all 5 alternatives the same within 5%.
- 1 alternative involving wind and no coal, with natural gas as backup, with a 20 year cost about 50% more than the alternatives with coal.

<http://efile.mpsc.state.mi.us/efile/docs/16077/0005.pdf> and
<http://efile.mpsc.state.mi.us/efile/docs/16077/0008.pdf>

MPSC staff responds to EGAA

- MPSC asks HBPW to participate in a technical forum to answer questions. HBPW declines, asks for written questions only. <http://efile.mpsc.state.mi.us/efile/docs/16077/0013.pdf>
- MPSC submits 43 written questions focusing especially on energy demand, price of coal, and renewable alternatives. <http://efile.mpsc.state.mi.us/efile/docs/16077/0015.pdf>
- HBPW answers. <http://efile.mpsc.state.mi.us/efile/docs/16077/0028.pdf>
- More HBPW answers. <http://efile.mpsc.state.mi.us/efile/docs/16077/0037.pdf> and <http://efile.mpsc.state.mi.us/efile/docs/16077/0039.pdf>
- MPSC asks 23 new questions, all related to energy demand, energy efficiency, and renewable fuels. <http://efile.mpsc.state.mi.us/efile/docs/16077/0040.pdf>

Sierra Club responds to EGAA

Sierra Club requests information on 26 items in the EGAA. <http://efile.mpsc.state.mi.us/efile/docs/16077/0009.pdf>

HBPW provides the information requested. <http://efile.mpsc.state.mi.us/efile/docs/16077/0028.pdf>

Sierra Club submits 40+ pages of technical reports from a variety of independent experts. These reports argue that the EGAA overstates demand and understates coal related costs. Sierra Club concludes that "HBPW's EGAA filing does not come close to satisfying these standards of showing that there are not 'feasible and prudent alternatives' to the proposed coal-fired power plant"

<http://efile.mpsc.state.mi.us/efile/docs/16077/0042.pdf> and
<http://efile.mpsc.state.mi.us/efile/docs/16077/0043.pdf>

Holland WEST responds to EGAA

Sara Leeland comments that (1) HBPW's process of application to build a 70+MW coal-fired electric power plant has been so focused on coal and cost-factors that it has not given serious consideration to social and environmental impacts of all alternatives; and (2) the HBPW process is disconnected from the long-term energy planning being done by the Holland City's Sustainability Committee. <http://efile.mpsc.state.mi.us/efile/docs/16077/0014.pdf>

Don Triezenberg comments that the EGAA offers a short term response to a long term problem (1) by ignoring the need to replace other aging boilers at JDY; (2) by failing to recognize reasonably anticipated major coal price increases and other carbon constraints; (3) by not referencing long term city energy planning initiated by the City Council; (4) and by omitting serious local energy efficiency efforts. <http://efile.mpsc.state.mi.us/efile/docs/16077/0029.pdf>

Other responses to EGAA

- FirstEnergy Solutions Corp. comments that the EGAA did not give adequate consideration to the advantages of Power Purchase Agreements over new construction. <http://efile.mpsc.state.mi.us/efile/docs/16077/0025.pdf>

- Zaski, a Michigan citizen, offers a 12 page detailed footnoted critique of the EGAA, arguing that a new coal fired plant will be an unneeded cost and environmental burden. <http://efile.mpsc.state.mi.us/efile/docs/16077/0012.pdf>
- Nearly 1000 other citizens expressed their opposition to doubling the coal burning capacity of JDY through brief letters or signing petitions submitted to MSPC or DNRE.