

E-01750A-10-0453

Jennifer Ybarra

ORIGINAL



From: Bradley Angel [bradley@greenaction.org]
 Sent: Monday, June 20, 2011 4:54 PM
 To: Antonio Gill; Newman-Web
 Cc: Teri Johnson; Myra; Alex Martinez
 Subject: Greenaction and Children for a Safe Environment Comments Opposing Mohave Electric Cooperative Incinerator/Renewable Energy Application
 Attachments: ATT773097.dat

Please find the comments of Greenaction for Health and Environmental Justice and Children for a Safe Environment in opposition to the request from Mohave Electric Cooperative attached to this email.

Please be sure to include these comments in the record for tomorrow's hearing. Thank you.

Arizona Corporation Commission
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***Greenaction for Health and Environmental Justice
Children for a Safe Environment***

June 20, 2011

Chairman Gary Pierce
Arizona Corporation Commission
Commissioners Wing
1200 West Washington
Phoenix, AZ 85007-2996

Re: Comments Opposing the Application of Mohave Electric Cooperative, Inc. for Approval of a Waste-to-Energy Facility/Municipal Solid Waste Mass Burn Incinerator as a Pilot Program Under The Renewable Energy Rules or, in the Alternative, for a Limited Waiver (Docket No. EO-1750A- 10-0453) - submitted via email June 20, 2011

Dear Chairman Pierce,

Greenaction for Health and Environmental Justice and Children for a Safe Environment submit these comments on behalf of our members and constituents in the Phoenix area regarding Staff's recommended order in the above-captioned proceeding.

On November 5, 2010, Mohave Electric Cooperative, Inc. filed an application with the Commission seeking an order that either recognizes energy produced at a Waste-To-Energy facility/ municipal solid waste ("MSW") mass burn incinerator as a pilot program or granting a waiver to the renewable energy standard to recognize the energy produced at the MSW mass burn incinerator as an "Eligible Renewable Energy Resource."

On May 10, 2011, Staff submitted its memorandum containing recommendations regarding the application and submitted a proposed order for the Commission's consideration. Staff recommended to reject MEC's request to treat the MSW mass burn incinerator as a pilot program pursuant to A.A.C. R14-2-1802(D) but recommends that the Commission grant a waiver pursuant to A.A.C, R14-2-1816(A) to the limited extent necessary to recognize energy produced at the MSW mass burn incinerator as an eligible renewable energy resource as defined by A.A.C. R14-2-1802(A).

On May 27, 2011, the Sierra Club-Grand Canyon Chapter submitted exceptions to Staff's recommended order. We fully endorse the Sierra Club-Grand Canyon's exceptions and comments and incorporate them into our comments.

We urge you to reject MEC's application to treat the MSW mass burn incinerator as a pilot program and oppose the grant of a waiver so that the MSW mass burn incinerator can be treated as an eligible renewable energy resource.

We are also very concerned that the two company's behind the incinerator proposal who are asking your agency for approval of their request have absolutely no track record with incineration. We are greatly

concerned that the technology is not even described. What type of MSW incinerator would this be? Whose technology would be used? What is the track record of that technology? Where would the toxic ash be disposed of?

Incinerators emit a wide range of hazardous air pollutants, including highly toxic dioxins and furans, toxic metals and a wide range of other pollutants. Contrary to the company's claim that incineration destroys dioxins, it actually creates dioxins as an accidental by-product of the combustion process.

We also believe that the proposal is unacceptably vague as it does not even describe where the proposed incinerator would be located. Would this project follow the standard practice of the waste industry to target vulnerable, low-income and communities of color for their polluting incinerator?

We are also concerned that approval of burning garbage as "renewable energy" is a perversion of renewable energy, and would actually undermine efforts to expand true renewable energy projects such as solar and wind power.

The companies also propose to recycle only 25% of the waste accepted at their proposed facility, a miserable and inadequate recycling rate – and proof that this proposed project would harm and not benefit the environment. Burning garbage and wasting resources that can and should be recycled and reused should not receive support from our government.

Disposal of valuable natural resources in incinerators and landfills is all too often considered inevitable. Alternatively, we can choose to invest in community-based "Zero Waste" solutions such as waste-reduction, reuse, recycling, and composting as a vehicle for environmental, job and economic renewal. Zero Waste is a viable alternative to incinerators and landfills. Zero Waste means investing in the workforce, infrastructure and strategies needed to reduce what we trash in incinerators and landfills to zero. It means stopping even another dime of taxpayer money from subsidizing waste projects that contaminate environments and the people who live there.

Stopping polluting incinerators in communities and achieving critical greenhouse gas emission reductions depends on true renewable energy and zero waste efforts gaining increased support from decision-makers at the local, regional and federal level.

Sincerely,

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