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Joint Conservation Parties Comments on the Draft 2015 Integrated Energy Policy Report Scoping Order

Additional submitted attachment is included below.



To: California Energy Commission
Dockets Office, MS-4
Re: Docket No. 15-IEPR-01
1516 Ninth Street
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Date: February 6, 2015

Subject: Joint comments of The Nature Conservancy, Defenders of Wildlife, NRDC, and Sierra Club on the *Draft 2015 Integrated Energy Policy Report Scoping Order*

Docket Number: 15-IEPR-01

The Nature Conservancy, Defenders of Wildlife, NRDC, and Sierra Club (“Joint Conservation Parties”) respectfully submit these comments to the California Energy Commission (CEC) in regards to the *Draft 2015 Integrated Energy Policy Report (IEPR) Scoping Order* (Scoping Order).

The Joint Conservation Parties are collaborating to work towards protection of ecosystems, landscapes and species while supporting the timely development of renewable energy resources in California. Achieving a low carbon energy future is critical for California – for our economy, our communities and the environment. Achieving this future—and *how* we achieve it—is critical for protecting California’s internationally treasured landscapes, productive farmlands, and diverse habitats.

I. Comments

The Joint Conservation Parties offer the following comments on the scope of the *2015 IEPR*, which are limited to two topics:

- 1. Renewables: Identification of issues and potential solutions for reaching Governor Brown’s goal of renewables for 50 percent of California’s electricity use by 2030.**

The Joint Conservation Parties strongly support the early identification of issues and potential solutions for reaching Governor Brown’s goal of renewables for 50 percent of California’s electricity use by 2030. We appreciate that the inaugural address outlined a wide range of initiatives – including demand-side resources, as well as supply-side resources – as a means to achieving this goal.

First, the Joint Conservation Parties recommend that the *2015 IEPR* renewables topic specifically include an exploration of how to incorporate ecological considerations into renewable energy policy and/or mandate setting, renewable energy planning, and transmission planning to achieve the Governor’s goal of renewables for 50 percent of California’s electricity use by 2030.

Second, the vision for achieving 2030 goals will require research, as noted in the Governor’s inaugural address. Toward that end, we encourage the CEC to initiate an investigation into the best available methods for quantifying the land, wildlife, habitat, and water use implications of renewable energy scenarios for 2030 and bring together stakeholders to discuss how the state can plan, in a comprehensive way, for future energy needs. Comprehensive planning proactively accounts for and manages the cumulative impacts of energy development before they happen. Through comprehensive planning the state can plan for energy development and protect wildlife, habitat and ecosystem function.

Third, the *2015 IEPR* should initiate a discussion of steps the agencies (e.g. CEC, CPUC, CAISO, CDFW, and USFWS) can take to facilitate comprehensive planning, inclusive of ecological considerations, for California’s post-33% electricity future. We strongly encourage the agencies continue to enhance and implement interagency coordination, collaboration, and communication in seeking a renewable energy future which is truly “smart from the start” in balancing energy development and environmental resource protection.

Fourth, the CEC has previously explored the need for a State Planning Process Pilot¹ for distributed generation that is inclusive of environmental constraints. As noted in the report, “The goal of the planning pilot is to develop a systemwide plan that identifies preferred locations where DG can minimize costs and provide value to the system, and where compatible land uses minimize environmental impacts.” The *2015 IEPR* should initiate a discussion of the steps the agencies (e.g., CEC, CPUC) can take to identify actionable mechanisms to incentivize distributed generation located at or near load centers.

¹ Shlatz, Eugene, Nathan Buch, and Melissa Chan. 2013. *Distributed Generation Integration Cost Study: Analytical Framework*. California Energy Commission. CEC-200-2013-007.

The IEPR proceeding is an important forum for bringing together a diverse set of stakeholders to inform the discussion and analyses. We feel that the *2015 IEPR* is well timed to address these issues, as the California energy agencies explore how to implement the Governor’s goal.

2. Electricity: Continuation of the analysis begun in the *2014 IEPR Update* on using landscape scale analysis for transmission planning.

The Joint Conservation Parties strongly support the CEC’s decision to continue the analysis begun in the *2014 IEPR Update* on using landscape scale analysis for transmission planning. As our organizations noted in our comments² to the *2014 IEPR Update*, landscape-scale planning for biodiversity conservation and renewable energy can serve as a roadmap for planning renewable energy and related transmission development needs.

Specifically, the state agencies (e.g., CAISO, CEC and PUC) should investigate how to further development of a strategic transmission investment strategy that prioritizes renewable energy generation in low-impact areas (e.g., zones) identified through publicly reviewed and adopted landscape-level planning processes. Providing access to transmission with available capacity within low-impact zones is one of the major benefits that could come from landscape-scale planning for energy and a key incentive for renewable energy developers.

Previous IEPRs have recommended the completion of the Desert Renewable Energy Plan (DRECP) process and other landscape level planning efforts for renewable energy development. We reiterate our support for the completion of the DRECP and for undertaking landscape level planning for renewable energy and supporting transmission in the San Joaquin Valley and elsewhere to meet our future energy needs.

The CEC is uniquely suited to use its convening power to continue to build upon the momentum of the *2014 IEPR Update* and further the dialogue in the *2015 IEPR*.

II. Conclusion

The Joint Conservation Parties appreciate the opportunity to comment on the *Draft 2015 IEPR Scoping Order* and recommend that the Commission draft the scope with the inclusion of the aforementioned recommendations. We look forward to continued participation in the proceeding.

² Joint Conservation Parties. *Comments to the Lead Commissioner Workshop on Integrating Environmental Information in Renewable Energy Planning Processes (August 5, 2014)*. August 19, 2014.

Sincerely,



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