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Comments of Defenders of Wildlife on Draft EPR Report

Additional submitted attachment is included below.

ATTACHMENT B

- Pg 144 “Potential Transformation of the California ISO Into a Regional Organization”
 - Defenders of Wildlife notes that California has demonstrated leading-edge landscape-scale planning techniques for renewable energy, especially in the DRECP and San Joaquin Valley areas. If grid regionalization will increase the quantity of energy resources sourced from locations outside of state boundaries, this should be accompanied by policies that ensure continuation of California’s best land-use and environmental practices. It would be unfortunate if grid regionalization resulted in lower-quality land use and environmental practices when procuring resources from out-of-state. Interagency land use and environmental planning initiatives will be needed; these can be supported by organizations such as WIEB and WECC.
- Pg 147 “Integrated Resource Plans”
 - Defenders recommends that it will be important for land use considerations and biological impacts to be a required part of any IRP submitted for approval by the Commission.
- Pg 147 “Landscape Planning to Achieve California’s Goals”
 - We note that several landscape-scale planning initiatives (DRECP, San Joaquin Valley least conflict solar study, RETI 2.0) have resulted in identification of a greater total quantity of available renewable resources than needed to reach California’s 2030 RPS goals (see final LTPP portfolios). This highlights the importance of selectiveness in procurement frameworks. There is no need to sacrifice sensitive species or habitat when sufficient cost-effective resources are available in low-conflict locations. Implementation of these findings is critical to successful implementation of the low-impact energy future.
- Pg 148 “Renewable Energy Transmission Initiative”
 - Change “33 percent target” to “50 percent target”
- Pg 149 “Desert Renewable Energy Conservation Plan”
 - Previous IEPRs have recommended the completion of the Desert Renewable Energy Plan (DRECP) process and other landscape-scale planning efforts for renewable energy development. We reiterate our support for the finalization and implementation of the DRECP. We reiterate our support for continuing landscape-scale planning for renewable energy and associated transmission to meet our future energy needs.
- Pg 150 “San Joaquin Least Conflict Planning for Solar PV”
 - The outcomes of the San Joaquin least conflict planning study for solar should be implemented and supported with appropriate transmission upgrades. Collaborative planning processes such as that completed in the San Joaquin valley should be undertaken in other regions. Further, we support continued focus on local government planning for renewable on private lands.
- Pg 150 “Renewable Energy Transmission Initiative 2.0”
 - RETI 2.0 should fulfill the promise of incorporating and building off the science, data, and analyses from investments in the Desert Renewable Energy Conservation Plan (DRECP) and San Joaquin Valley Solar Project by taking the following steps:
 - The TTIG should identify the backbone (bulk system) upgrade implications of interconnecting renewable generation facilities within DFAs and Least-Conflict Lands within the California Deserts TAFAs and San Joaquin Valley TAFE, respectively.
 - If/when the TTIG identifies a new transmission line as an upgrade implication, the ELUTG should use the DataBasin environmental profile generator to conduct a corridor examination to highlight the environmental implications.
 - If RETI 2.0 is going to address imports and out of state renewable resources in a meaningful way, then we recommend that a process should be initiated to collect high quality land use and environmental information for the specific out-of-state resources under consideration.
- Pg 152 “Transmission Planning”

- Change “33 percent target” to “50 percent target”
- Pg 155 “Coordinated Agency Infrastructure Planning”
 - The report reads: “Further work is needed to better characterize the environmental implications of proposed renewable generation and transmission projects throughout California and in other Western regions.”
 - We recommend adding “especially in the context of potential grid regionalization.”
 - We further note that there is no mention of the CEC “Statewide Energy Planning” project that is currently underway, with Conservation Biology Institute as lead contractor. The Statewide Energy Planning project directly addresses the need identified in this section, by creating statewide online GIS maps of landscape intactness and conservation value on a 1 km grid scale. This spatial information will be very useful to inform infrastructure siting decisions. We recommend that this active project should be mentioned as part of Chapter 6: “Policy Development and Planning Going Forward.”