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| <b>Docket Number:</b>   | 16-AFC-01   |
| <b>Project Title:</b>   | Stanton Energy Reliability Center   |
| <b>TN #:</b>            | 224324  |
| <b>Document Title:</b>  | Clean Coalition Withdrawal as Intervenor  |
| <b>Description:</b>     | Letter requesting to withdraw as intervenor and recommending an Energy Commission practice of developing adequate DER alternatives early in the process |
| <b>Filer:</b>           | Doug Karpa  |
| <b>Organization:</b>    | Clean Coalition   |
| <b>Submitter Role:</b>  | Intervenor  |
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| <b>Docketed Date:</b>   | 7/31/2018   |

Presiding Member Janea Scott

Commissioner Karen Douglas

Hearing Officer Kenneth Celli

California Energy Commission

1516 Ninth Street

Sacramento, CA 95814

July 30, 2018

Dear Commissioners and Hearing Officer Celli,

The Clean Coalition intervened in this proceeding for the purpose of educating both staff and the Commissioners on the critical importance of developing and analyzing robust distributed energy resources (DER) alternative projects that can meet the full performance characteristics of any proposed natural gas plant. Numerous projects involving solar generation, energy storage, and automated demand response (DR) in particular have proven that DER are a viable approach to providing energy, reliability, and ancillary services. If the California Energy Commission is serious about addressing climate change, the Commission should adopt a practice of developing credible DER alternatives on every proposal to build any fossil-fueled plant going forward. The Clean Coalition has not changed our established position and will continue to advocate for a policy of developing credible alternatives to fossil-fueled plants going forward.

On the other hand, the Clean Coalition also recognizes that the Stanton Energy Reliability Center (SERC) proceeding is well-advanced in most aspects of the evidentiary

record. Thus, our intervention comes too late to allow staff or the Commission to fully develop credible DER alternatives that would meet the performance requirements of SERC and to evaluate such an alternative. The Clean Coalition is also mindful that the Final Staff Assessment finds no significant environmental impacts that could be reduced or eliminated by an alternative.

Our experience and that of DER developers has shown that well-integrated DER can provide the same or superior energy, reliability, and ancillary services as gas-fired peaker plants in a cost-effective manner. A proper evaluation of an integrated DER solution requires the development of alternatives that are not limited by artificial or unrealistic constraints that preclude adequate performance (e.g., assuming that all resources must be deployed on a single plot or that PV installations require the purchase of siting areas), but rather the development of integrated DER approaches that realistically replicate the performance characteristics of proposed natural gas plants.

In order to put DER on some approximation of an equal footing, we strongly request that Energy Commission staff engage with the Clean Coalition and other similar stakeholders to take advantage of their expertise to develop these alternatives. We fully recognize that developing robust alternative designs requires time, effort, and perhaps expertise that is beyond the scope of what Energy Commission staff can reasonably provide. However, attempting to develop alternative designs with at least some information about the requisite performance characteristics often results in subpar analyses. Therefore, we strongly but respectfully suggest the Energy Commission also adopt a practice of engaging with stakeholders early in the process. Such an approach

would provide significant benefits to the Commission in terms of higher quality intervenor contributions, provide California ratepayers with a fair consideration of alternatives, and finally, provide benefits to the global environment by assisting the Energy Commission in further developing the clean energy economy in California.

Given these factors, the Clean Coalition requests to withdraw its objections to the scope of alternatives in the Final Staff Assessment of the Stanton Renewable Energy Center and requests our submissions be treated as public comment. Since we have no further contributions to the Commission's deliberations to make, we do not plan on participating further in this proceeding and do not plan to participate in the upcoming evidentiary hearing. We therefore also request to withdraw our intervention.

Respectfully submitted,



Doug Karpa, J.D., Ph.D.

Policy Director

Clean Coalition