

**Comments of the Center for Energy Efficiency and Renewable Technologies  
On the Draft Integrated Energy Policy Report**

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The Center for Energy Efficiency and Renewable Technologies (CEERT) appreciates the many hours of work the California Energy Commission (CEC) and CEC staff has invested in the Draft Integrated Energy Policy Report (IEPR) over the past year and a half. This enormous effort continues to unify California's energy stakeholders and policy-makers by compiling and analyzing valuable information to inform important statewide energy decisions. CEERT has commented on various topics included in the report during the relevant IEPR hearings and comment periods and therefore offers the following general comments in support of the IEPR process.

The analyses and information contained in the Draft IEPR should serve as a starting point for a number of new and ongoing energy planning activities throughout the state in order to expedite implementation of California's ambitious energy goals. California's energy agencies must resist the temptation to re-create studies and planning reports in order to move forward rapidly with the results of existing studies and policies.

More specifically, the information contained in the IEPR report should inform the nascent 33% Renewable Energy Standard (RES) rulemaking at the California Air Resources Board (ARB), which will also require full coordination between the CEC, CARB, the California Public Utilities Commission (PUC), and the California Independent System Operator (ISO). While the various roles of each agency/organization have not been identified at this point in the rulemaking, the expertise of the CEC, PUC, and ISO will be essential for successful implementation. An appropriate starting point for the rulemaking, therefore, is data collection and analysis. By relying on information already compiled and assessed in the Draft IEPR, the ARB will be able to complete its rulemaking within the expedited timeframe. Furthermore, the CEC and PUC will execute key functions during implementation of the 33% RES, including transmission planning, siting, and permitting, siting and permitting of renewable energy generation facilities, and renewable energy procurement and contract review. CEERT supports the Draft IEPR recommendation that the PUC impose penalties on investor-owned utilities (IOUs) for non-compliance with the existing 20% RPS targets and strongly urges the ARB, CEC, and PUC to ensure that appropriate penalties are imposed on investor- and publicly-owned utilities who fail to achieve the 33% RES targets.

CEERT also notes that the 33% RES rulemaking at the ARB presents a real opportunity for the various energy agencies to focus on fossil fuel retirements as the more renewables are brought online between 2009 and 2020. To do so, the CEC, PUC, ARB, and ISO should begin to evaluate existing fossil resources and identify opportunities for displacement of fossil fuel by renewables. Such retirements of fossil resources will open up access to transmission for newer, cleaner, renewable energy. Indeed, much data, analysis, and collaboration will be required for such a process, and the IEPR can serve as a useful starting point to ensuring that the policy objectives of the 33% RES—such as green jobs, climate mitigation, and air quality benefits—become policy outcomes in 2020.

CEERT understands the scenarios leading to the decreased electricity demand forecast. However we suggest simultaneous consideration of the 2007 and 2009 forecasts in order to develop more balanced policies.

Since its inception in 2002, the intent of the IEPR has been for the CEC “to develop energy policies that conserve resources, protect the environment, ensure energy reliability, enhance the state's economy, and protect public health and safety.”<sup>1</sup> These objectives of conservation, environmental protection, reliability, economic enhancement, and public health and safety should connect the state's energy agencies (CEC, PUC, and ARB) and encourage collaboration between the agencies, the ISO, and stakeholders. This connection should be strengthened by a reliance on accurate and consistent information to develop integrated policies with common objectives. Therefore, the information contained in the 2009 IEPR should serve as a starting point for further analysis and energy decision-making throughout the state.

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<sup>1</sup>Public Resources Code § 25301a