

**DOCKETED**

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**Defenders of Wildlife Comments on Draft 2023 IEPR Docket 23-IEPR-01**

*Additional submitted attachment is included below.*



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December 1, 2023

California Energy Commission  
Docket Unit - MS-4  
715 P Street  
Sacramento, California 95814  
Sent via email to: [docket@energy.ca.gov](mailto:docket@energy.ca.gov)

RE: Draft 2023 Integrated Energy Policy Report (Docket Number 23-IEPR-01)

Dear Commissioners:

This comment letter is submitted by Defenders of Wildlife (Defenders) on behalf of its 2.1 million members in the U.S., including over 316,000 in California. Defenders has a long history of advocating for generating and transmitting electricity from renewable energy sources to customers with the least environmental impact. Achieving a low carbon energy future is critical for California's economy, communities, and environment. Achieving this future—and how we achieve it—is critical for protecting California's internationally treasured wildlife, landscapes, productive farmlands, and diverse habitats.

We appreciate the Commission and staff's work in this Integrated Energy Policy Report (IEPR) proceeding and efforts to identify a path to accelerate the delivery of clean energy resources to the electric grid. We agree that the interconnection of clean energy resources, particularly distributed energy resources (DER), at all levels must be accelerated if California is to meet its clean energy goals. More generation, storage, and transmission are needed but it must also be the right type that serves the right places. We applaud the Commission's initiative and work on the Land Use Screens for Electric System Planning. Their value is already seen in the busbar mapping for the proposed 2024-25 Transmission Planning Process portfolios.

## **Comments**

We generally support the draft Recommendations in the IEPR and offer the

following comments on Chapter 1:

***Problem 1: Accelerated Deployment is Straining Existing Planning Paradigms***

The Draft IEPR rightly identifies that large resource and transmission planning strategies can be adapted to distribution systems. We recommend the Commission convene a Renewable Energy Transmission Initiative (RETI) like planning initiative for DER. A stakeholder driven DER RETI could accelerate much needed DER development. We request a specific DER RETI recommendation be included in the 2023 IEPR.

***Problem 2: The Growing Number and Size of Projects Applying to Comment Overwhelm Existing Processes and Can Lack Adequate Capacity***

The Draft IEPR correctly notes that many of the applications in the California Independent System Operator (CAISO) interconnection queue are exploratory. We support CAISO's efforts to create a more efficient generator interconnection process and the implementation of transmission zones. These zones can be used to better identify appropriate, viable locations for generation and transmission investments. This work can be supported by the Commission's Land Use Screens for Electricity Planning.

Further, we particularly support the draft Recommendation #4 for this Problem:

*Explore opportunities to deploy temporary power solutions, prioritizing zero emission technologies, to allow more resources to connect in the near-term while permanent infrastructure is planned and constructed.*

We believe this can accelerate much needed DER development in rural and underserved communities, particularly those impacted by extreme weather events and power safety shutoffs.

***Problem 3: Rate Impacts Must Be Managed While Rapidly Preparing the Grid***

We generally support the draft recommendations for this Problem and have no further comments at this time.

***Problem 4: Capacity and Connection Processes and Timelines Are Not Always Transparent or Consistently Tracked***

Draft Recommendation 1 for this Problem includes improving and expanding the scope of publicly available tools and datasets that guide developer decision making. These tools should also support informed engagement and decision

making by agencies, load serving entities, transmission operators, communities, and stakeholders.

We have two recommendations to better inform the process and decision making:

1. *Align the CPUC's RESOLVE resource regions and CAISO transmission study areas.*

The boundaries and geographies in the RESOLVE resource regions and CAISO transmission study areas cover similar areas but are inconsistent.

## RESOLVE Resource Regions and CAISO Study Areas

- Figure on left shows the RESOLVE resources regions for solar and storage (onshore wind resources are broken down into further sub-areas).
- CAISO's ten transmission study areas do not align perfectly with these regions with some study areas split between RESOLVE regions.

RESOLVE region	CAISO Study Area(s)
Northern California	PG&E North of Greater Bay & PG&E Greater Bay
Southern PG&E	PG&E Fresno & PG&E Kern
Greater Tehachapi	Part of SCE Northern
Greater LA Metro	SCE Metro & Part of SCE Northern
Greater Kramer	SCE North of Lugo
Southern Nevada	East of Pispah
Riverside	Part of SCE Eastern (excluding AZ buses)
Arizona	Part of SCE Eastern and Part of SDG&E (AZ buses)
Greater Imperial	Part of SDG&E
San Diego	Part of SDG&E

California Public Utilities Commission



1

The lack of geographical alignment between these key planning models undermines efficient generation and transmission planning. It hinders a clear understanding of what types of megawatts are being considered where. In other words, stakeholders and energy planners shouldn't need a decoder table to understand how many megawatts are being assigned to the San Joaquin Valley vs. the Western Mojave or other regions. We request the 2023 IEPR include a recommendation to align the RESOLVE and CAISO study areas to uniform geographies and that CAISO's future transmission zones be aligned as well.

<sup>1</sup> [CPUC Preferred System and 2024-25 TPP – Busbr Mapping Workshop Slides. October 20, 2023. Slide 28.](#)

## *2. Map the Busbar Mapping*

The data and outputs from busbar mapping are dense and the portfolio implications can be difficult to visualize with the Busbar Mapping Dashboard spreadsheet.<sup>2</sup> This is further hampered by the lack of consistency between the RESOLVE resource regions and CAISO study areas and substation names, which have no relation to their geographical location. We recommend the CPUC and CEC develop an online geospatial mapping tool that allows visualization at the state-wide and west-wide level of the busbar mapping output, portfolios, and sensitivities. The map can be built upon the Commission's Land Use Screens for Electric System Planning mapping tool. Such a map would allow decision makers, agencies, and stakeholders to see where megawatts are being assigned more clearly and consider the implications for project viability, community benefits, and a just energy transition.

### ***Problem 5: Permitting is Slow and the Scale of Deployment Will Need Public Engagement Outside of Formal Permitting Processes***

We generally agree with and support these draft recommendations. However, expanding infrastructure capacity within existing rights-of-way in Recommendation #1 must consider what and where is being served. New expansion and investments must not be used to further develop areas of high environmental and social implications, such as the area around Kramer substation. Instead, new expansion and investments should be prioritized to benefit areas such as those subject to groundwater retirement in the San Joaquin Valley or disadvantaged communities.

Siting transmission and generation in areas of low environmental implication is fundamental to streamlining permitting and construction while reducing costs. We ask the Commission to include a recommendation in the 2023 IEPR that directs the CEC, CPUC, and CAISO to operationalize the CAISO's zonal approach to prioritize transmission development to service generation in areas of low environmental implication. Publicly available geospatial mapping tools should be used to visualize generation, transmission, natural resources, and geographies as a whole to guide decision making.

We are concerned with the proposed implementation of Recommendation #2's early and frequent coordination with local and tribal governments, planning entities, and

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<sup>2</sup> [CPUC Dashboard for Preliminary Mapping of Proposed 24-25 TPP Base Case. October 26, 2023.](#)

developers being led by utilities and transmission operators. Utilities and transmission operators have a decades long record of self-serving, profit driven decisions. They will focus on profit rather than meeting California needs in a cost effective, efficient way that balances the protection of natural and cultural resources with meeting California's clean energy needs.

The coordination in Recommendation #2 is critical and must not be led by profit driven entities. Infrastructure planning is land use planning. It cannot be left up to commercial interests and investors. We recommend that the Governor's Office of Planning and Research lead this effort with support from the CEC, CPUC, CAISO, utilities, and transmission operators.

## Conclusion

Thank you for the opportunity to comment on the draft 2023 IEPR. Please contact Pamela Flick at (916) 442-5746 or [pflick@defenders.org](mailto:pflick@defenders.org) or Kate Kelly at (530) 902-1615 or [kate@kgconsulting.net](mailto:kate@kgconsulting.net) with any questions.

Respectfully,



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