

## DOCKETED

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*Comment Received From: Jamie Asbury*

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**Comments of the Imperial Irrigation District on the Draft 2015 Integrated Energy Policy Report Scoping Order**

*Additional submitted attachment is included below.*



# IID

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February 9, 2015

California Energy Commission  
Dockets Office, MS-4  
Re: Docket No. 15-IEPR-01  
1516 Ninth Street  
Sacramento, CA 95814-5512

**Re: Comments of the Imperial Irrigation District on the Draft 2015 Integrated Energy Policy Report Scoping Order**

The Imperial Irrigation District ("IID") respectfully submits these comments on the Draft 2015 Integrated Energy Policy Report ("IEPR") Scoping Order, pursuant to the Notice issued January 26, 2015.

The Scoping Order proposes inclusion of the 50% renewable resource target articulated by Governor Brown recently.<sup>1</sup> Within that overall topic, IID urges the Commission to specifically provide for workshops, comments, and detailed discussion of the role geothermal energy may play to assist California to meet this and other policy objectives.

California is striving to reduce GHG emissions to 1990 levels by 2020 (AB 32), stretch carbon reduction goals outlined by the Air Resources Board in its First Update to the Climate Change Scoping Plan,<sup>2</sup> and the Governor's recently articulated a goal of 50 percent renewables by 2030. Numerous factors will need be balanced, including:

1. The need to electrify the transportation sector to meet carbon reduction goals, increasing electric capacity factors and energy usage;
2. The retirement of San Onofre Nuclear Generating Station, the possible retirement of Diablo Canyon, retirement of Once-Through-Cooling units, and the expiration and termination of coal contracts, all of which reflect a loss of baseload generation;
3. Possible increased electric load on the water supply and conveyance system due to shrinking fresh water supply and additional needs for desalination; and

<sup>1</sup> <http://www.gov.ca.gov/news.php?id=18828>

<sup>2</sup> [http://www.arb.ca.gov/cc/scopingplan/2013\\_update/first\\_update\\_climate\\_change\\_scoping\\_plan.pdf](http://www.arb.ca.gov/cc/scopingplan/2013_update/first_update_climate_change_scoping_plan.pdf)

4. Economic impacts of renewable choices moving forward, including the creation of high paying, sustainable jobs in California, particularly in less fortunate communities, as a result of additional renewable infrastructure investment. This metric is highly consistent with the stated desires of legislative leadership<sup>3</sup> and should be discussed by the Commission as it helps shape energy portfolio policies.

All of these factors support a more detailed examination of the role of geothermal resources in the overall resource portfolio, including scrutiny of barriers to geothermal procurement in the existing procurement processes.

IID appreciates the Commission's consideration of the comments.

Respectfully Submitted,

A handwritten signature in blue ink that reads "J. Asbury (cas)". The signature is stylized and cursive.

Jamie L. Asbury  
Deputy Energy Manager, Business/Regulatory

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<sup>3</sup> <http://www.latimes.com/local/politics/la-me-pol-climate-change-20150208-story.html>