

## DOCKETED

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**Joint Conservation Parties â€™ Comments on the Draft 2016 IEPR Update Scoping Order**

*Additional submitted attachment is included below.*



To: California Energy Commission  
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Docket No. 16-IEPR-01  
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From: Kim Delfino, Defenders of Wildlife  
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Date: March 4, 2016

Subject: Joint comments of Defenders of Wildlife, The Nature Conservancy, NRDC, and Sierra Club on the *Draft 2016 Integrated Energy Policy Report Update Scoping Order*

Docket Number: 16-IEPR-01

Defenders of Wildlife, The Nature Conservancy, NRDC, and Sierra Club ("Joint Conservation Parties") respectfully submit these comments to the California Energy Commission (CEC) in regards to the *Draft 2016 Integrated Energy Policy Report Update (IEPR) Scoping Order* (Scoping Order).

The Joint Conservation Parties collaborate in our work towards protection of ecosystems, landscapes and species while supporting the timely development of renewable energy resources in California. Achieving a low carbon energy future is critical for California – for our economy, our communities and the environment. Achieving this future—and *how* we achieve it—is critical for protecting California's internationally treasured landscapes, productive farmlands, and diverse habitats.

The Joint Conservation Parties strongly support leveraging analytical tools for landscape scale analysis, the finalization and implementation of the Desert Renewable Energy Conservation Plan (DRECP), and facilitating local government efforts for renewable energy

planning. We appreciate that these were included in the *2015 IEPR* recommendations for Strategic Transmission Investment Planning.

## **I. Comments**

The Joint Conservation Parties offer the following comments on the Scoping Order for the *2016 IEPR Update*, which are limited to three topics:

### **1. Landscape-scale Planning: Finalize and implement the Desert Renewable Energy Conservation Plan (DRECP) and leverage analytical tools to conduct further landscape-scale analysis for renewable energy planning in the San Joaquin Valley and elsewhere.**

The Joint Conservation Parties strongly support continuing the analysis begun in the *2014 IEPR Update* on using landscape scale analysis for transmission planning. As our organizations noted in our comments<sup>1</sup> to the *2014 IEPR Update*, landscape-scale planning for biodiversity conservation and renewable energy can serve as a roadmap for planning renewable energy and related transmission development needs.

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 and for continuing landscape level planning for renewable energy and supporting transmission in the San Joaquin Valley and elsewhere to meet our future energy needs.

The CEC is uniquely suited to use its convening power to continue to build upon the momentum of these planning efforts with the *2016 IEPR Update*.

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<sup>1</sup> Joint Conservation Parties. *Comments to the Lead Commissioner Workshop on Integrating Environmental Information in Renewable Energy Planning Processes (August 5, 2014)*. August 19, 2014.

**2. Geothermal: Geothermal Development at the Salton Sea provides multiple benefits and should be facilitated.**

Development of geothermal at the Salton Sea will provide air quality, economic, and carbon benefits. Bringing this valuable resource to market may require new transmission investments, which have long lead-times. We encourage the California Energy Commission to hold a workshop regarding the geothermal resources at the Salton Sea and to develop an action plan for bringing these resources to commercial market.

**3. Least Regrets Transmission: Development of policies to direct transmission to support development of renewable energy in least-regrets areas identified via landscape-scale planning.**

Ideally, sustainable planning for renewable energy would first review availability of existing transmission lines and the potential to add new lines on existing towers. Those opportunities, where available, should then be aligned with least-regrets areas identified through landscape scale planning.

We also encourage the development of policies that support the implementation of landscape-scale planning for renewables. Specifically, the state agencies (e.g., CAISO, CEC and PUC) should investigate the development of policies that prioritize renewable energy generation in least-regret areas (e.g., zones) identified through publicly reviewed and adopted landscape-scale planning processes. Providing transmission to least-regret zones identified by landscape-scale planning is a key incentive for renewable energy development and facilitates the long term implementation of these plans. Our organizations strongly believe in the importance of a California energy future that uses landscape-scale planning to *first* identify preferred areas of least-regret for generation development and then strategically plans transmission investments to these areas for timely development and delivery of renewable energy. In this paradigm, the evaluation of needed transmission would consider the feasible buildout of consensus generation areas as the guide for transmission proposals, together with need to protect and manage natural and working lands.

## II. Conclusion

The Joint Conservation Parties appreciate the opportunity to comment on the *Draft 2016 IEPR Update Scoping Order* scope and recommend that the Commission draft the scope with the inclusion of the aforementioned recommendations. We look forward to continued participation in the proceeding.

Sincerely,



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