

## DOCKETED

<b>Docket Number:</b>	17-IEPR-01
<b>Project Title:</b>	General/Scope
<b>TN #:</b>	222453
<b>Document Title:</b>	Defenders of Wildlife Comments on 2017 Final Integrated Energy Policy Report CEC-100-2017-001-CMF
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Defenders of Wildlife
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	2/7/2018 3:09:14 PM
<b>Docketed Date:</b>	2/7/2018

*Comment Received From: Defenders of Wildlife*

*Submitted On: 2/7/2018*

*Docket Number: 17-IEPR-01*

**Defenders of Wildlife Comments on 2017 Final Integrated Energy Policy Report  
CEC-100-2017-001-CMF**

*Additional submitted attachment is included below.*



To: California Energy Commission  
Dockets Office, MS-4  
Docket No. 17-IEPR-01 General/Scope  
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From: Kim Delfino, Defenders of Wildlife

Date: February 7, 2018

Subject: Comments of Defenders of Wildlife on the 2017 Final Integrated Energy Policy Report CEC-100-2017-001-CMF

Docket Number: 17-IEPR-01

Defenders of Wildlife (Defenders) respectfully submits these comments on the January 2018 draft of the Final Integrated Energy Policy Report (2017 IEPR) to the California Energy Commission (CEC).

Defenders, on behalf of our 140,000 members and supporters in California, works towards protection of wildlife, ecosystems, and landscapes 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 wildlife, landscapes, productive farmlands, and diverse habitats.

## **I. Comments**

We offer the following comments on the proposed 2017 IEPR.

### **Landscape-Scale Planning is Essential**

We appreciate CEC’s continued focus and commitment to landscape-scale planning for renewable energy and transmission. The tools being collected in the California Energy Gateway and the development and implementation of the Environmental Report Writer (ERW) provide the platform for geospatial analysis and landscape–scale planning that will result in conservation of ecosystems,

species, and important landscapes by identifying the right and wrong places for future development. We appreciate that the Commission has put so much time, effort, and funding into developing tools to this end. We are pleased to see the progress on the California Energy Gateway (Gateway) and strongly believe it will benefit and support smart from the start planning for energy projects. Even more importantly, the Gateway is poised to deeply benefit landscape level planning and preliminary development project planning across California. The Gateway will allow governmental agencies, project proponents, tribes, stakeholders, conservation organizations, and communities to readily access fundamental environmental information that can be used to guide initial land use considerations. We would like to point out, however, that it has now been 10 months since the workshop previewing the Gateway (April 6, 2017 workshop on environmental information for energy planning<sup>1</sup>), and the website still has not been publicly launched, nor has a timeline been released for its launch.

Equally important, the Gateway and the ERW will provide electrical load serving entities the tools for informed decision-making to select least-environmental-impact projects for procurement.

Defenders deeply supports leveraging the Gateway and the ERW for analysis and facilitating local government efforts for renewable energy planning and for procurement decision-making by electric load serving entities.

### **Desert Area Transmission Constraints**

We reiterate our concern about studying whether new transmission investments are needed in the desert. We think it may be a better investment of state agency and CAISO capacity to determine the availability of renewable resources under an Energy-Only arrangement, which would allow for more energy delivery across existing wires, as compared to Full Capacity Deliverability Status. For example, in RETI 2.0, the CAISO estimated 412 MW available under an Energy-Only arrangement in the Kramer & Inyokern region.<sup>2</sup> Developing renewable resources under an Energy-Only arrangement may allow for better utilization of the existing transmission system and create an opportunity to develop new renewable resources in areas of least conflict or low impact that have been zoned specifically for renewable energy development. A good example is the San Joaquin Valley. The California Public Utility Commissions' (CPUC) Integrated Resource Plan (IRP) inputs and assumptions show that transmission costs in San Joaquin Valley (\$11/kw-yr.) are lower than cost of new transmission in the desert (\$54-60/kw-yr.).<sup>3</sup> There are also operational benefits to a maintaining geographic diversity in the solar resource mix.<sup>4</sup> Greater consideration should given to solar development on least conflict lands in the San Joaquin Valley before further transmission investment in desert.

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<sup>1</sup> [http://energy.ca.gov/renewables/enviro\\_info-energy\\_planning/documents/](http://energy.ca.gov/renewables/enviro_info-energy_planning/documents/)

<sup>2</sup> [http://docketpublic.energy.ca.gov/PublicDocuments/15-RETI-02/TN211341\\_20160503T092907\\_Revised\\_Presentation\\_by\\_Neil\\_Millar\\_5216.pdf](http://docketpublic.energy.ca.gov/PublicDocuments/15-RETI-02/TN211341_20160503T092907_Revised_Presentation_by_Neil_Millar_5216.pdf)

<sup>3</sup> See transmission cost estimates provided by CAISO Inputs and Assumptions document, table 23 [http://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/UtilitiesIndustries/Energy/EnergyPrograms/ElectPowerProcurementGeneration/LTPP/2017/RESOLVE\\_CPUC\\_IRP\\_Inputs\\_Assumptions\\_2017-05-15.pdf](http://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/UtilitiesIndustries/Energy/EnergyPrograms/ElectPowerProcurementGeneration/LTPP/2017/RESOLVE_CPUC_IRP_Inputs_Assumptions_2017-05-15.pdf)

<sup>4</sup> <http://www.sciencedirect.com/science/article/pii/S0038092X16304820>

## **Desert Renewable Conservation Plan (DRECP)**

In light of the Department of Interior's decision to review the DRECP, it is now more than ever essential that the State of California rigorously defend the DRECP. It is completely unnecessary to reopen the DRECP plan just after it was completed. The DRECP is a strong science-based plan that was the product of 8 years of work, close collaboration with the State of California and local governments, with extensive public outreach and comment (with 16,000 comments) and provides more than enough lands for CA to meet its renewable energy goals. The DRECP was meticulously documented through Data Basin and there is no need to change any land use designations or management unless there is significant new information and there is not. A new exercise to reopen this plan will only create a cloud of uncertainty in the desert for solar development and slow down efforts to meet our renewable energy goals.

## **Chapter 5 Recommendations**

We strongly support the recommendations for developing and deploying the California Energy Gateway, the Environmental Report Writer, and the use of landscape-scale planning efforts to further the reduction of GHG emissions. These tools will facilitate informed planning and decision making by agencies, local government, communities, electrical load serving entities, and stakeholders to achieve California's renewable energy goals while protecting our natural resources. To that end, we urge that the California Energy Gateway and Environmental Report Writer be made publicly available as soon as possible and no later than mid-2018.

One of the recommendations looks to promote interconnecting in- and out-of-state transmission and further import/export of renewable resources. California has spent considerable time and resources to plan for renewable energy and to seek ways to reduce its' environmental impacts in California. It makes little sense to then shift development outside of the state where landscape-scale planning is less established without also including a similar level of landscape-scale planning for out of state projects.

Another of the IEPR recommendations is to connect federal Section 368 corridors. We recommend adding the following phrase: "subject to limitations in Corridors of Concern identified in the Settlement Agreement."<sup>5</sup> Many of the Section 368 corridors have wildlife and habitat resource conflicts noted in the Settlement Agreement, which may affect the viability of these corridors. A list of Corridors of Concern can be seen in Exhibit A of the Settlement Agreement.<sup>6</sup>

Regarding the recommendation to alleviate desert area transmission constraints. We recommend this be reconsidered and investment instead be made in the San Joaquin Valley (e.g. Gates to Gregg)

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<sup>5</sup> <http://corridoreis.anl.gov/regional-reviews/settlement/>

<sup>6</sup> [http://corridoreis.anl.gov/documents/docs/Settlement\\_Agreement\\_Package.pdf#page=29](http://corridoreis.anl.gov/documents/docs/Settlement_Agreement_Package.pdf#page=29)

which would increase geographic diversity of solar energy generation and help reduce development pressure on desert ecosystems.

The Desert Constraint scenario is outlined in the RETO 2.0 Plenary Report. The report indicates that “Possible solutions for this limitation could include either a new... 500 kV line between Mira Loma substation... [and] Desert Center or a new 500 kV line between Lugo and Eldorado substations. Either of these projects could have significant permitting challenges and an order-of-magnitude cost of \$1 billion.”<sup>7</sup>

We note that large proactive transmission investments in the California desert (Tehachapi Renewable Transmission Project) have already been made, and these infrastructure investments have driven unprecedented levels of renewable energy development in the California Desert. This area is suffering disproportionately compared to other areas of the state, from environmental impacts of this development. Environmental analysis completed in the The Nature Conservancy ORB study (2015) concluded that large-scale renewable energy development trends in some Super CREZs have already exceeded the levels that would be considered optimal from an environmental perspective,<sup>8</sup> while low-conflict, high quality renewable resources in other parts of the state continue to go underutilized.

## **Additional Comments:**

### **Integration of Energy Planning**

Disconnects between transmission planning, energy planning, and environmental planning continue to need to be remedied. Geospatial information from the CEC’s Environmental Information for Energy Planning (Docket 17-IEPR-13) needs to be formatted for incorporation into the CPUC IRP and the resulting geospatial data should flow into the CAISO Transmission Planning Process portfolios as well.

The RETI 2.0 environmental data has not been incorporated into the environmental screens characterizing the renewable supply curve in the CPUC’s IRP RESOLVE model.<sup>9,10</sup> Additional work

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<sup>7</sup> [http://docketpublic.energy.ca.gov/PublicDocuments/15-RETI-02/TN216198\\_20170223T095548\\_RETI\\_20\\_Final\\_Plenary\\_Report.pdf](http://docketpublic.energy.ca.gov/PublicDocuments/15-RETI-02/TN216198_20170223T095548_RETI_20_Final_Plenary_Report.pdf)

<sup>8</sup> See 2015 ORB report, in particular section 2.3.2: Site-selection using integer linear optimization. Relaxing site suitability estimates. Accessible online at the following URL:

[https://www.scienceforconservation.org/assets/downloads/TNC\\_ORB\\_Report\\_Final\\_2015.pdf](https://www.scienceforconservation.org/assets/downloads/TNC_ORB_Report_Final_2015.pdf)

Super CREZ where development trends exceed environmental optimum include Palm Springs, Imperial, Mountain Pass, Carrizo South, and Solano. Additional exceedances occur in SB Lucerne, Victorville, Kramer, and Tehachapi.

<sup>9</sup> <https://reti.databasin.org/galleries/b436fc659b584aa4b4f2e52f570452a2>

<sup>10</sup> See IRP Inputs and Assumptions document, section 4.2.1, accessible online here:

[http://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/UtilitiesIndustries/Energy/EnergyPrograms/ElectPowerProcurementGeneration/LTPP/2017/RESOLVE\\_CPUC\\_IRP\\_Inputs\\_Assumptions\\_2017-05-15.pdf](http://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/UtilitiesIndustries/Energy/EnergyPrograms/ElectPowerProcurementGeneration/LTPP/2017/RESOLVE_CPUC_IRP_Inputs_Assumptions_2017-05-15.pdf)

is needed to incorporate environmental data identified in RETI 2.0 into a format that is compatible with the CPUC's IRP RESOLVE model.

## II. Conclusion

Defenders of Wildlife appreciates the opportunity to comment on the January 2018 IEPR and we strongly support continued development and use of data platforms and analytical tools to support landscape-scale planning. We appreciate and commend the Commission for continuing to provide leadership in the critical area of landscape-scale planning. We encourage the Commission to continue this important work as it will facilitate improved siting and development of energy projects as well as providing additional benefits for other land use planning and siting efforts. We look forward to continued participation in IEPR proceedings.

Sincerely,

A handwritten signature in black ink, appearing to read "Kim Delfino", with a long horizontal flourish extending to the right.

Kim Delfino  
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Defenders of Wildlife  
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