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Defenders of Wildlife Comments on Draft 2019 IEPR

Additional submitted attachment is included below.



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November 27, 2019

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 19-IEPR -01
1516 Ninth Street
Sacramento, CA 95814-5512

Delivered via email to: docket@energy.ca.gov

RE: Docket No. 19-IEPR-01
Comments on Draft 2019 Integrated Energy Policy Report

Defenders of Wildlife (Defenders) respectfully submits these comments on the November 12, 2019 Draft 2019 Integrated Energy Policy Report (Draft 2019 IEPR). Defenders, on behalf of our 279,000 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.

We appreciate the Commission and staffs’ efforts developing the 2019 IEPR. The draft reflects both the breadth and complexity of California’s energy transition. On page 35 of the Draft 2019 the following recommendation is made:

Develop a plan that identifies the appropriate amount and mix of resources and technologies to ensure reliability in the near- to mid-term while facilitating the longer term transition to a zero-carbon electricity system called for in Senate Bill 100.

The California Energy Commission (CEC) should continue to work with the California Public Utilities Commission (CPUC), the California Air Resources Board, and the California Independent System Operator (California ISO) to develop an orderly plan for deploying new clean technologies to ensure a reliable zero-carbon grid in 2045. The plan for the near- to mid-term should account for plant retirements, identify critical, strategically located gas generation needed for reliability where deferring retirements may be

appropriate, and ensure that new and emerging technologies are employed to fill the role of these plants. This will allow for the retirement of natural gas generation and provide a reliable and resilient grid in the long term.

A plan to identify how much and what kind of resources technologies is important, but, it is essential that such a plan also identifies where and how these resources and technologies are developed and implemented. SB 100 brings a bold clean energy future to California that will require a holistic, collaborative integrative approach by all parties to achieve its milestones.

SB 100 specifically requires consideration of environmental costs and environmental protection. The bill directed the Joint Agencies and all other state agencies shall take ... “into full consideration the economic and environmental costs and benefits of renewable energy and zero-carbon resources.”¹ The legislation further directed the Joint Agencies to consult with all California balancing authorities to produce a joint report to the Legislature that includes a review of the 100% renewables and zero carbon by 2045 policy ... “focused on technologies, forecasts, then-existing transmission, and maintaining safety, environmental and public safety protection, affordability, and system and local reliability.”²

Achieving SB 100 goals is not just a matter of identifying how much and what kind of generation needs to be developed and procured. Reaching the goals set forth under SB 100 could result in potentially significant land use impacts. According to The Nature Conservancy’s Power of Place study, achieving 100% renewables could require up to 1.2 million acres of renewable energy development in California.³ Such a massive amount of development is likely to induce significant impacts to California’s and/or the West’s landscape, natural resources, and land uses. How and where renewable energy projects and infrastructure are to be developed will be critical to ensure that securing a 100% renewable energy future occurs with the least amount of conflict, delay and impact on our important natural resources.

Thus, successful energy planning requires land use planning.

Consideration of land use implications in the development of lands for renewable energy generation and transmission is also consistent with the state policy and required by Senate Bill 1386, which states “[i]t is the policy of the state that the protection and management of natural and working lands is an important strategy in meeting the state’s greenhouse gas emissions reduction goals.” (emphasis added)

SB 1386 directs “[a]ll state agencies, including, but not limited to, the Natural Resources Agency, the Department of Food and Agriculture, and the California Environmental Protection Agency, and their respective departments, boards, and commissions, [to] consider the policy set forth in this section when revising, adopting, or establishing policies, regulations, expenditures, or grant criteria

¹ CA Public Utility Code Section 454.53(b)(2)

² CA Public Utility Code Section 454.53(d)(2)(A)

³ <https://www.scienceforconservation.org/products/power-of-place>

relating to the protection and management of natural and working lands. State agencies shall implement this requirement in conjunction with the state's other strategies to meet its greenhouse gas emissions reduction goals and with the intent to, among other things, promote the cooperation of owners of natural and working lands.⁴ (emphasis added)

To meet the policy requirement in SB 1386 and to fulfill the goal of deploying “least conflict” energy production, the plan recommended by the Draft 2019 IEPR must go beyond simply identifying the appropriate amount and mix of resources and technologies and must incorporate consideration of land use implications. Identifying the what, how, and where for utility scale renewable energy development in California has been an area of intense focus for the past decade by federal, state, and local government as well as a diverse group of stakeholders that has resulted in planning efforts to identify “least-conflict” areas for utility scale renewable energy development and transmission including the Desert Renewable Energy Conservation Plan (DRECP)⁵ and the San Joaquin Least Conflict Study.⁶

To further facilitate siting and development of renewable energy, including utility scale projects, the CEC has invested significant effort in developing the tools and resources found in the California Energy Gateway.⁷ In particular, the California Energy Infrastructure Planning Analyst⁸ was created by the Conservation Biology Institute for the California Energy Commission to assist with planning energy development throughout the state to improve planning efficiency and to avoid environmental risks based on the best available spatial datasets.

The Draft 2019 IEPR recommended plan must continue the focus and investment in least-conflict planning and development and implementation of policies that direct energy development and transmission to least-conflict areas and emphasize distributed generation near load to further reduce unwarranted impacts.

Because energy planning must involve land use planning, we recommend that the Governor's Office of Planning and Research (OPR) and the California Natural Resources Agency (CNRA) be included in the team developing the recommended plan and implementation strategies. OPR and CNRA will bring beneficial and necessary land use planning input to bringing SB 100 to life in a sustainable and environmentally responsible manner.

Conclusion

Thank you for the opportunity to provide initial comments on the Draft 2019 Integrated Energy Policy Report. We look forward to actively participating in the development of the SB 100 Report.

⁴ CA Public Resources Code Section 9001.5

⁵ <https://www.drecp.org/>

⁶ <https://www.law.berkeley.edu/research/clee/research/climate/solar-pv-in-the-sjv/>

⁷ <https://caenergy.databasin.org/>

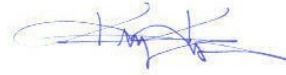
⁸ <http://ceipa.databasin.org/>

Please contact Kim Delfino at (916) 313-5800 or kdelfino@defenders.org or Kate Kelly at (530) 902-1615 or kate@kgconsulting.net with any questions.

Sincerely,



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