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**Defenders of Wildlife Comments on Draft 2022 IEPR**

*Additional submitted attachment is included below.*



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California Energy Commission

Docket Unit, MS-4

Docket No. 22-IEPR-01

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RE: Docket No. 22-IEPR-01

Comments on Draft 2022 Integrated Energy Policy Report

Defenders of Wildlife (Defenders) respectfully submits these comments on the Draft 2022 Integrated Energy Policy Report (Draft Report). Defenders, on behalf of our 323,000 members and supporters in California, works towards the 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.

## Comments

We appreciate the Commission and staff’s efforts in developing the Draft Report, the creation of the California Planning Library and, in particular, the updates to land use screens for electric system planning and mapping tool. The Draft Report states, *“Information is foundational to building the policies and tools necessary to equitably achieve carbon neutrality by 2045.”* We could not agree more. Energy and transmission planning is hampered by a lack of a centralized transparent data repository that includes data and analysis used for IEPR, busbar mapping, SB 100 implementation, California Independent System Operator (CAISO) 20 Year Outlook,

Executive Order N-82-20 (30 x 30), water resources, and California Natural Resources Agency (CNRA), CalEPA and wildfire data sets. The data and analysis must be readily available so agencies and stakeholders can actively engage and issue spot for potential renewables, storage, and transmission projects. Taken together, the California Planning Library, land use screens, and mapping tool will provide the foundation for informed consensus building to identify paths to building renewable energy generation and storage rapidly enough to meet California's energy needs while protecting natural and cultural resources.

#### *Centralized Energy Policy and Planning Information and Calendar*

The siloed nature of proceedings at the California Energy Commission (CEC), California Public Utility Commission (CPUC), and other agencies makes it difficult to locate, navigate, and track information and decision-making. The centralized planning library and mapping tool envisioned in the Draft Report will enable agencies and stakeholders to track proceedings, find points of intersections, utilize uniform mapping analysis, and identify salient data gaps. We strongly support the development of an online calendar tool that includes a timeline for agency deliverables. A regularly updated centralized calendar for energy policy and planning proceedings will allow users to see the status of analysis in proceedings and when, where, and how information is used in energy planning.

#### *Natural Resource Geospatial Planning for Energy and Transmission*

We have been long-time advocates for geospatial planning for generation and transmission that is fundamentally built upon robust biodiversity, habitat, and agricultural datasets to identify appropriate least conflict areas for energy and transmission development. We support the use of the CEC's land use screening methodology and mapping tool by the CPUC for busbar mapping after the methodology and Mapping Tool are updated to address the above issues and errata.<sup>1</sup>

The Draft Report correctly notes, “*As California procures unprecedented quantities of clean energy resources, load serving entities and project developers face issues that may lead to project delays or even cancellations.*” One key source of project delays and cancellations are complications and increased costs resulting from poor project siting in areas of high natural and cultural resource conflicts.<sup>2</sup> As California moves forward in meeting SB 100 and 30x30, the continued development and ground-truthing of methodology, datasets, and mapping outputs is

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<sup>1</sup> See Defenders of Wildlife’s November 1, 2022 [Comments on Draft Staff Report on Land Use Screens for Electric System Planning and Electric System Planning Web Mapping Application](#)

<sup>2</sup> Dashiell, S.; Buckley, M.; Mulvaney, D. Green Light Study: Economic and Conservation Benefits of Low-Impact Solar Siting in California, 2019.

evermore essential to balance clean energy development with natural and working lands protection.

### *Keeping Data Current*

Many datasets are dynamic and protocols for annual or, in some cases, more frequent updates are needed. For example, land protection by agencies and land trusts for conservation purposes via fee title purchases and conservation easements occurs throughout the year. The protected lands dataset will need frequent, at least quarterly, updates to accurately reflect lands that are legally precluded from development. We urge the State to provide adequate and consistent funding to support further development and ongoing data updates for the California Planning Library, the land use screens for electric system planning, and the electric system planning web mapping tool. The Library, land use screening, and web mapping application are essential tools for planning California's energy future.

### *Collaborative Agency Planning*

Finally, because energy planning is land use planning, we recommend that the Governor's Office of Planning and Research (OPR), CNRA, and in particular, the California Department of Fish and Wildlife be included in the team developing the California Planning Library. OPR, CNRA, and CDFW will bring beneficial and necessary land use and conservation planning input to advance California's energy planning in a sustainable and environmentally responsible manner.

## **Conclusion**

Thank you for the opportunity to provide comments on the Draft Report. We look forward to actively participating in the development and implementation of the California Planning Library. 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.

Sincerely,



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