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Additional submitted attachment is included below.



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California Energy Commission

Docket Unit, MS-4

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RE: Docket No. 22-IEPR-01

Comments on the 2022 Integrated Energy Policy Report

Defenders of Wildlife (Defenders) respectfully submits these comments on the 2022 Integrated Energy Policy Report (2022 IEPR) on behalf of our 323,000 members and supporters in California. We strongly support timely renewable energy development that will help meet California's emission reduction goals and avoids destruction of important wildlife habitat and loss of at-risk species. Achieving a low-carbon energy future 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 2022 IEPR, the creation of the California Energy Planning Library, and in particular, the updates to land use screens for electric system planning and mapping tool. The 2022 IEPR 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's 20 Year Outlook, Executive Order N-82-20 (30x30), water resources, and California Natural Resources Agency (CNRA), CalEPA, and wildfire data sets. We appreciate and support the Commission and staff's efforts

to make data and analysis readily available so agencies and stakeholders can actively engage in renewable energy policy and planning and the permitting of potential renewable generation, storage, and transmission projects. Taken together, the California Energy 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.

Collaborative Agency Planning

Because energy planning is land use planning, we recommend that the Governor's Office of Planning and Research (OPR), CNRA, and particularly the California Department of Fish and Wildlife (CDFW) 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.

Centralized Energy Policy and Planning Information and Calendar

The centralized California Energy 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 the Planning Library and an online calendar tool that includes a timeline for agency deliverables. While helpful, the calendar graphic in Figure 4 of the 2022 IEPR lacks the granularity needed for effective engagement. We recommend a calendar tool that provides more detail and that is updated regularly. 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

The 2022 IEPR 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.¹ As California moves forward in meeting SB 100 and 30x30 goals, the continued development and ground-truthing of methodology, datasets, and mapping outputs is evermore essential to balance clean energy development with natural and working lands protection.

¹ Dashiell, S.; Buckley, M.; Mulvaney, D. Green Light Study: Economic and Conservation Benefits of Low-Impact Solar Siting in California, 2019.

We are long-time advocates for geospatial planning for generation and transmission that is fundamentally built upon conservation planning with robust biodiversity, habitat, and agricultural datasets to identify appropriate least conflict areas for energy and transmission development. We support the use of the Commission's land use screening methodology and mapping tool by the California Public Utilities Commission for busbar mapping after the methodology and Mapping Tool are updated to address the above issues and errata.²

Funding to Keep Data Current

We strongly support the 2022 IEPR's recommendation: *"The state should provide adequate and consistent funding to support further development and ongoing data updates for the California Energy Planning Library."* The Energy Planning Library, land use screening, and web mapping application are essential tools for planning California's energy future. Many of the datasets used in the Energy Planning Library are dynamic and protocols for annual or, in some cases, more frequent updates will be needed.

Conclusion

Thank you for the opportunity to provide comments on the 2022 IEPR. We look forward to actively participating in the development and implementation of the California Energy Planning Library and land use screens. Please contact Pamela Flick at (916) 442-5746 or pflick@defenders.org or Kate Kelly at (530) 902-1615 or kate@kgconsulting.net with any questions.

Sincerely,



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² 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](#)