

DOCKETED

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**Defenders of Wildlife Comments on IEPR Clean Energy Bulk Grid
Interconnection Workshop Docket 23-IEPR-04**

Additional submitted attachment is included below.



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May 31, 2023

California Energy Commission

Docket Unit - MS-4

715 P Street

Sacramento, California 95814

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

RE: Bulk Grid Interconnection Workshop (Docket Number 23-IEPR-04)

Dear Commissioners:

Thank you for holding the May 4th workshop on clean energy interconnection to the bulk grid. This comment letter is submitted by Defenders of Wildlife (Defenders) on behalf of its 2.1 million members in the U.S., including over 316,000 in California. Defenders has a long history of advocating for generating and transmitting electricity from renewable energy sources to customers with the least environmental impact. 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 staff's work in the IEPR proceeding and efforts to identify a path to accelerate interconnection to the grid. We agree that interconnection at all levels must be accelerated if California is to meet clean energy goals. Most transmission is needed but it must also be the right type of transmission that serves the right places and generation.

The California Independent System Operator's (CAISO) zonal approach provides the opportunity to prioritize and direct transmission planning and investments to not just areas of high energy resource values but, importantly, to areas of low environmental implication (aka least conflict) as identified via land use screening such the California Energy Commission's (CEC) Land Use Screens for Electric System Planning. As has been shown by both the March 13, 2020 CEC [staff presentation](#) on Land Use Screens for Electric System Planning Report and The Nature Conservancy's [Power of Place Study - California](#), there is "room enough" to build out clean energy to meet SB 100 and Executive Order N-82-20 (30x30) goals.

The need for additional local community outreach and education to reduce opposition to renewable generation and transmission projects has been a common theme from some parties

in energy proceedings. Well-sited, well-designed, and well-operated projects that avoid adverse impacts to natural resources and local communities are an immediate solution to reduce community opposition. A "build it anywhere and everywhere as fast as possible because there is a climate emergency" strategy will only delay meeting California energy goals, increase costs, and exacerbate community opposition. Public education does not fix bad siting. The adage "go slow to go fast" remains true – solid land use planning will accelerate energy and transmission development to meet sustained record build rates.

Siting transmission and generation in areas of low environmental implication is fundamental to streamlining permitting and construction while reducing costs. We ask the Commission to include a recommendation in the 2023 IEPR that directs the CEC, California Public Utilities Commission, and CAISO to operationalize the CAISO's zonal approach to prioritize transmission development to service generation in areas of low environmental implication and to utilize land use screen mapping tools being developed by the CEC to identify low environmental implication alignments for new transmission lines.

Conclusion

Thank you for the opportunity to comment on this important issue. 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.

Respectfully,



Pamela Flick
California Program Director



Kate Kelly
Consultant