DOCKETED	
Docket Number:	25-IEPR-01
Project Title:	General Scope
TN #:	261699
Document Title:	Defenders of Wildlife Comments - Defenders of Wildlife Comments on 2025 IEPR Report Scope 25-IEPR-01
Description:	N/A
Filer:	System
Organization:	Defenders of Wildlife
Submitter Role:	Public
Submission Date:	2/11/2025 3:59:21 PM
Docketed Date:	2/11/2025

Comment Received From: Defenders of Wildlife
Submitted On: 2/11/2025
Docket Number: 25-IEPR-01

Defenders of Wildlife Comments on 2025 IEPR Report Scope 25-IEPR-01

Additional submitted attachment is included below.

California Program Office
P.O. Box 401, Folsom, California 95763
www.defenders.org

February 11, 2025

California Energy Commission
Docket Unit, MS-4
Docket No. 25-IEPR-01
715 P Street
Sacramento, California 95814-5512

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

RE: Draft Scoping Order for the 2025 Integrated Energy Policy Report

Defenders of Wildlife (Defenders) respectfully submits these comments on the Draft Scoping Order for the 2025 Integrated Energy Policy Report (IEPR). Defenders is dedicated to protecting all wild animals and plants in their natural communities and has 2.1 million members and supporters in the United States, 311,000 of whom reside in California. We employ science, public education and participation, media, legislative advocacy, litigation, and proactive on-the-ground solutions to prevent the extinction of species, associated loss of biological diversity, and habitat alteration and destruction.

We strongly support the development of renewable energy production. A low-carbon energy future is critical for California's economy, communities, and environment. Achieving this future—and *how* we achieve it—is critical for protecting California's internationally treasured wildlife, landscapes, and diverse habitats. We believe transitioning to a renewable energy future need not exacerbate the ongoing extinction crisis by thoughtfully planning projects while protecting habitat critical to species.

Comments

We offer the following comments and recommendations for energy policy and implementation to advance clean energy deployment by identifying and addressing

barriers and solutions to accelerate the delivery of clean energy to our communities. Our comments build upon the work of the 2023 IEPR.

Commission's Land Use Screens for Electricity Planning Require Regular Updates

The 2023 IEPR identified updating the Commission's Land Use Screens for Electricity Planning[1] (CEC Land Use Screens) as one of the initiatives that help accelerate permitting decisions.[2] Since then, the CEC Land Use Screens have become a backbone that informs energy and transmission planning in the Senate Bill 100, California Public Utilities Commission (CPUC), and California Independent System Operator's (CAISO) energy and transmission planning proceedings. The busbar mapping for the integrated resource planning for transmission portfolios relies on the CEC Land Use Screens to identify the land use and environmental implications of energy portfolios being considered.

It is essential the CEC Land Use Screens are regularly updated. The updates should include both methodologies to adapt the CEC Land Use Screens to lessons learned with their use and to update data sets to keep them current. For example:

- Protected Areas - The CEC Land Use Screens currently use data from 2022 for the location of California protected areas. That data was updated in 2024 and now includes an additional 144,000 acres of protected lands[3] and over 200,000 acres of conservation easements.[4] This fundamental data set must be accurate and current to avoid wasting time evaluating projects that are legally precluded.
- Groundwater – Matching renewable energy development with critically overdrafted groundwater basins, such as Sustainable Groundwater Management Act (SGMA) lands in the San Joaquin Valley, has become a key tool for repurposing agricultural lands to less intensive uses. Additionally, the CPUC's busbar mapping now includes consideration of groundwater implications of pumped hydro storage projects. The CEC Land Use Screens must be updated to include data sets to capture groundwater resources.

[1] https://www.energy.ca.gov/data-reports/california-energy-planning-library/land-use-screens
[2] Bailey, Stephanie, Jennifer Campagna, Mathew Cooper, Quentin Gee, Heidi Javanbakht, and Ben Wender. 2023. 2023 Integrated Energy Policy Report. California Energy Commission. Publication Number: CEC-100-2023-001-CMF. At p. 8
[3] https://www.calands.org/wp-content/uploads/2024/06/CPAD-2024a-Database-Manual.pdf at p. 6
[4] https://www.calands.org/wp-content/uploads/2024/06/CCED-Manual-2024a.pdf at p. 15

Recommendation: We urge the Commission to make updates to the CEC Land Use Screens a standard component of the biennial IEPR that is issued during odd-numbered years to enable a routine process for needed updates and stakeholder engagement.

Accelerate Front of the Meter Utility Scale Distributed Generation and Storage to Reduce Reliance on Bulk Transmission Grid

Local communities can benefit from small to medium utility-scale solar front of the meter (FTM) distributed generation and storage (DGS) that is:

- developed on and within the built environment (e.g., warehouses, schools, distribution centers, large commercial and industrial buildings),
- located close to load, and
- utilizes the local distribution grid,

FTM DGS provides both community benefits and the opportunity to reduce the need for costly new bulk grid transmission and the vast acreage needed to develop utility-scale renewable energy generation far from load centers. FTM DGS can rapidly advance clean energy deployment due to its reduced land-use impacts, improved community energy and economic resilience, and reduced need for costly transmission capacity. We direct the Commission's attention to the November 14, 2023 comments submitted by the Joint Non-Profit Parties for an approach to integrating a maximum FTM DGS ("Max DG") scenario into the analytic framework for Senate Bill 100.[5]

FTM solar DGS developed on the built environment, located close to load – particularly in areas with high electric load growth – is more sustainable and aligned with state policies to meet our clean energy future and protect our environment.[6] A study by the National Renewable Energy Laboratory (NREL) in 2016 found that solar photovoltaic generation deployed on buildings of all sizes in California could supply 74 percent of annual electricity sales by California's utilities.[7] The jaw-dropping magnitude of this estimate, which is based only on building rooftops and does not include other potential deployment sites, combined with the important benefits

[5] https://efiling.energy.ca.gov/GetDocument.aspx?tn=253118&DocumentContentId=88320
[6] Executive Order N-82-20
[7] NREL, "Rooftop Solar Photovoltaic Technical Potential in the United States: A Detailed Assessment": https://www.nrel.gov/docs/fy16osti/65298.pdf

noted above of locating supply resources close to load centers, should be sufficient evidence for the Commission to take this potential seriously and include it in the portfolio of tools to advance clean energy deployment. The Commission should use the 2025 IEPR to fully integrate FTM DGS as part of California's energy future. Failure to do so will only result in business-as-usual excessive reliance on the bulk grid and remote generation, which are expensive and environmentally fraught.

Recommendation: The IEPR should include policy direction to accelerate FTM DGS development and deployment close to load centers that can be served via the local distribution grid. This resource would provide low-cost, zero-emission energy and storage, avoiding the need to build long lead time and costly bulk transmission lines.

CEC Land Use Screens to Inform Transmission Routing

The transmission system is quite literally the backbone of California's clean energy transition. Transmission facilities need to be appropriately planned and sited so they can be built on time. However, transmission projects frequently face delays or project failure due to poor planning and siting. Currently, the transmission planning process (TPP) identifies the need for additional transmission between Point A and Point B, which is shown as a conceptual line on a map. The transmission planning and permitting process is missing a crucial step early in the process, which routinely results in poorly sited or routed transmission infrastructure that garners opposition and causes project delays and increased costs. Transmission planning cannot just be connecting Point A to Point B. Proposed corridors and routes need to be designed using environmental and land use screens and input from stakeholders as a first step once the anticipated start/end points have been identified in the CAISO TPP process and before an application is submitted to the CPUC. This approach will help minimize environmental and land use conflicts that cause expensive and time-consuming delays in the permitting process.

Recommendation: We recommend the IEPR explore how the CEC Land Use Screens can be used not only for busbar mapping but also for transmission route planning. These land use and environmental screens incorporate well vetted data and have been broadly accepted by stakeholders. Using best available land use and environmental screens in a transparent public process will help avoid the opposition that comes when stakeholders and communities are blindsided by ill-conceived transmission projects.

Conclusion

We thank the Commission for the opportunity to provide input on the scope for the 2025 IEPR and look forward to actively participating in the development of the report. 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,

Pamela Flick
California Program Director

Kate Kelly
Consultant