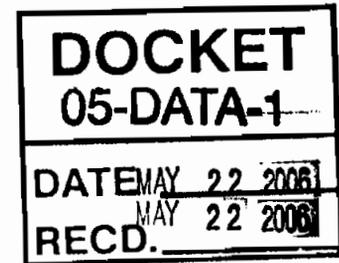




May 22, 2006



California Energy Commission
Docket Office
Attn: Docket 05-DATA-1
1516 Ninth St., MS-4
Sacramento, CA 95814-5512

Subject: Comments on the 2007 Integrated Energy Policy Report (IEPR) Hearing

The City of Redding Electric Utility (REU) appreciates the opportunity to submit written comments in response to the *Staff-Proposed Changes to the California Energy Commission's Regulations On Data Collection and Related Matters* ("Staff Report") in docket 05-DATA-1. As was the case in 2005, REU fully intends on participating with the CEC's data requests during the 2007 IEPR process. REU respects the CEC's desire to abide by SB 1389 for the collection and reporting of energy related data, and applauds the CEC's effort to collect the necessary information to produce a comprehensive, wide reaching energy policy directive for the California Legislature and Governor.

In the Staff Report, the CEC has broadened the subject areas of data collection from the previous 2005 IEPR process, while creating entirely new subject areas of data collection. REU realizes that many changes have taken place in the energy sector, mainly an increased focus on the environment, resource adequacy, and long-term fuel stability/diversity. Therefore, REU expected to see these additional data collection areas outlined in the Staff Report. However, REU does question the appropriateness of such a broad reaching scope in this particular proceeding. The amount of information that is contemplated to be provided by participating entities would be enormous, possibly reaching a point of degrading the output of the CEC's reporting ability.

REU supports the comments of the California Municipal Utilities Association (CMUA), including the reference to Public Resources Code Section 25320(b)(4) that states the CEC should rely upon data that is already reported to other agencies. Much of the potential data requested in the Staff Report is already provided by REU to other entities, including the Western Electric Coordinating Council (WECC) (Loads and Resources reporting, Power Supply Assessment) and the Shasta County Air Quality Management District (Power Plant emissions data).

REU also supports the CMUA's comments regarding the submission of data that is reasonably relevant per Public Resources Code Section 25320(b)(2). REU believes

Braun & Blaising, P.C.

Attorneys at Law

May 22, 2006

Hand Delivery

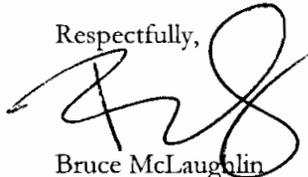
California Energy Commission
Docket Unit
Attn: Docket No. 05-DATA-1
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512

Dear Docket Clerk:

Enclosed for filing in the above referenced proceeding are the originals of the:

1. Comments of the California Municipal Utilities Association on the Staff-Proposed Changes to the Energy Commission's Regulations
2. Comments on the 2007 Integrated Energy Policy Report (IEPR) Hearing by the Redding Electric Utility
3. Comments of the Northern California Power Agency on the on the "Staff-Proposed Changes to the California Energy Commission's Regulations on Data Collection and Related Matters."

Respectfully,



Bruce McLaughlin
Attorney for the California Municipal Utilities Association

Enclosures

May 22, 2006



the CEC may be including data in the Staff Report that extends beyond what could be considered reasonably relevant to the IEPR process. As an example, section 1304 (2)(b)(3) requests “the most recent fuel composition analysis and an estimate of the energy content of the fuel”. REU (as is likely the case with most other utilities) does not have the resources to analyze the composition of the fuel nor its energy content. REU assumes the fuel provided to the generators is of regulated quality and energy content, as this requirement is left to the gas supplier through appropriate ongoing regulatory oversight.

Further, in section 1304 (3)(a), the CEC requests submission of emission factors. When power plants are permitted for operation by the local air-quality management district (AQMD), there are certain emissions that must be monitored and maintained at permitted levels. Therefore, at the time of construction, equipment is put in place to monitor the various emissions components as required by the permit. The CEC is proposing to request a myriad of emissions factor data in the Staff Report. The reality of data availability may be much different, and will most likely vary by power plant (which will vary by AQMD emissions restrictions) while being closely tied to what is considered reasonable to collect and meter by the respective generator. REU respects the CEC’s efforts at collecting an appropriate level of data and offers an alternative suggestion below as to how to obtain it.

The cost of adding test equipment to measure the various emissions factors proposed in the Staff Report would be enormous. However, the CEC can still obtain significant emissions data through the existing emissions reporting required by other agencies such as the AQMDs and the Environmental Protection Agency (EPA). Therefore, the CEC should alternatively seek the existing environmental reports rather than duplicating the efforts of existing work products.

Finally, after review of section 1304(b) et. seq., REU believes the requirement to report environmental information relating to water supply, biological resources, and wildlife is duplicative to the power plant permitting and licensing process and may disregard previous findings of the various entities involved with the permitting and licensing process. Further, this requirement would trigger significant expenses to be incurred by the responding parties, as is the case when permitting and licensing a power plant. The staff and expertise that would be required to provide such a response is not likely to be available for the majority of responding parties.

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The review of water supply, biological resources and wildlife impact is best handled on a case by case basis when new power plants are being considered for permitting and licensing. Therefore, the inclusion of water supply, biological resources, and wildlife impact should not be considered as reasonably relevant in the scope of data collection. In conclusion, REU staff believes the IEPR process is an important contribution for future policy directives. It is vital for the CEC to request an appropriate level of data while maintaining a balance of cost effectiveness and resource availability, in order to produce meaningful and substantive reports that can provide clear information to California's energy policy makers.

Thank you,

A handwritten signature in black ink that reads 'Tim Nichols'.

Tim Nichols
Assistant Director, Resource Planning