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| <b>DOCKET</b><br>08-IEP-1 |             |
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June 10, 2008

California Energy Commission  
Dockets Office, MS-4  
Re: Docket No. 08-IEP-1  
1516 Ninth Street  
Sacramento, CA 95814-5512

Dear Commission:

Re: Southern California Edison Company's (SCE) Comments on the 2009 Integrated Energy Policy Report (IEPR) – Docket No. 08-IEP-1

Southern California Edison Company (SCE) appreciates the opportunity to present the following comments on the 2009 IEPR scope. In Attachment A to the Notice of Committee Hearing, "Proposed Scope of 2009 Integrated Energy Policy Report" (Scoping Memo), the California Energy Commission (CEC) has established an appropriate set of topics to be evaluated in the 2009 IEPR. SCE offers the following as additional topics for consideration.

**The CEC Should Continue To Coordinate Its Work with the California Public Utilities Commission**

SCE greatly appreciates the coordinated work taking place between the CEC and California Public Utilities Commission (CPUC) staffs on the 2008 Long Term Procurement Plan. For instance, SCE is hopeful that CEC staff's input to CPUC efforts to standardize utility reporting protocols for long-term procurement plans will simplify utility compliance with similar reporting requirements in the 2009 IEPR. SCE looks forward to working with the CEC on the 2008 IEPR Update and the 2009 IEPR and to continuing coordination between CEC and CPUC staffs on these matters as well.

**California Should Incorporate Advance Transmission Planning In Its Land-Use Evaluation**

Land use issues are critical to the development of new transmission. First, community long-range land use plans often do not consider the need for electric infrastructure. Second, local community concerns about infrastructure project impacts often further delay the development of new transmission. The CEC should investigate how to engage local communities early on in effective planning for transmission corridors and routes. In particular, providing opportunities to share long-range plans and address local concerns has the potential to reduce the project development times while lessening local concerns. This is consistent with recent actions the State has undertaken to incent local communities to incorporate emission impacts of local land use planning.

## **SCE Encourages Continued Renewable Resource Integration Assessment**

SCE suggests that the 2009 IEPR should continue to acknowledge and report the results of ongoing efforts to better understand renewable resource integration. Integrating renewable resources is not just a matter of addressing intermittency issues. Renewable resources sometimes generate electricity at times when it is difficult to accommodate the full output of renewable projects. In the case of renewable energy, the traditional response of curtailing excess off-peak generation is inconsistent with the State's goal of increasing renewable output. Although renewable resource integration is being addressed in the 2008 update, SCE expects that analyses of renewable resource intermittency and integration issues will continue to be undertaken during the period in which the 2009 IEPR is conducted. The 2009 IEPR should continue to monitor and incorporate this work on renewable resource integration in its policy recommendations.

## **The CEC Should Consider Further Clarifying Its Preferred Resource Loading Order**

Under the Energy Action Plan, new conventional resources follow energy efficiency, demand response, renewable energy resources and combined heat and power (CHP) in the preferred resource loading order. In light of California's AB-32 and expected federal legislation to reduce Greenhouse Gas (GHG) emissions, the CEC should consider the value of identifying a preference for low GHG emission conventional resources such as clean coal (carbon capture and sequestration technologies) and nuclear generation. The CEC should consider additional near term actions that could ensure that clean coal and nuclear generation can be timely options.

## **The CEC Should Provide a Means to Clarify Confidentiality Requests Prior to Submitting Information**

SCE would like to meet with CEC personnel to discuss the potential for clarifying and identifying standards for confidentiality prior to submitting potentially confidential information.

Sincerely,

Manuel Alvarez

cc: Commissioner Jeffrey Byron  
cc: Commissioner Jackie Pfannenstiel