

**Alliance for
Responsible
Energy
Policy**

"Supporting renewable energy solutions that do not destroy our environment!"

Date: July 22, 2008
To: Jim Bartridge
Cc: Judy Grau
Subject: CEC Staff Workshop

Due to circumstances beyond my control I will be unable to travel to Sacramento to attend the CEC workshop tomorrow. Unfortunately, due to my short notice neither of our spokespersons will be able to attend in my place. The Alliance for Responsible Energy Policy (AREP) is very appreciative of the invitation to attend and we regret that we will not be able to participate in person.

Judy Grau's email indicated that participants in panel # 2: ***"...may submit any written material for docketing on the record."*** Consequently, AREP submits the following information for the record and requests, if possible, that our comments are read during the panel 2 discussions with regard the central question of this workshop: **Transmission Barriers.**

Briefly stated the Alliance for Responsible Energy Policy supports:

- Reduced dependance upon fossil fuel to produce energy.
- Increased use of renewable sources to meet energy demand.
- Technologically assisted demand side management to improve conservation.
- California's RPS goals as established by AB32.

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The Alliance for Responsible Energy Policy believes there are vital barriers to transmission that are not receiving adequate consideration by the CEC, CPUC, ISO, RETI, all the MUO, IOU and corporations involved in the rush to permit utility-scale and transmission projects. Briefly stated the Alliance for Responsible Energy suggests the following **Transmission Barriers** must be given meaningful consideration:

- CEQA and NEPA require all viable alternatives must be considered before encroaching upon undisturbed public lands. AREP believes California's rush to identify CREZ and permit new transmission lines has failed to adequately consider distributed generation and demand side management alternatives and ultimately courts will therefore rule that the CRETI is in violation of CEQA and where there federal act applies NEPA.
- A centralized power grid compromises our national security by increasing our vulnerability to terrorist attacks.
- Power lines have been causal or contributory factors in wild fires that have taken lives, destroyed properties and habitats. California and other municipal and corporate parties associated with the siting, construction and operation of transmission lines will ultimately be liable for lives, properties and habitat lost due to wild fires caused or exacerbated by downed or arcing power lines. California taxpayers will undoubtedly and unfortunately endure much of these costs.
- The proposed utility-scale projects and the necessary transmission lines will compromise millions of acres and consume our precious water resources. Pristine habitat will be destroyed and the resulting cumulative effect on our overall ecosystem is unknown, understudied and thus not given adequate consideration. Creating more liability for

California and the ultimate burden on taxpayers when litigation settlements or awards are resolved in the courts.

- The actions of the CRETI and associated parties engaged in the siting of utility-scale and transmission projects create precedence that seriously compromises environmental protection laws and private property rights. This precedence will lead to further destruction of habitat and ecosystems, displacing families and businesses and damaging adjacent property values all at tax payer expense.

The Alliance for Responsible Energy Policy briefly informs the CEC workshop that there are viable alternatives to utility-scale and transmission projects that by law must be given serious consideration. Thus, the process of fast-tracking these projects must be postponed until a comprehensive and adequate assessment of distributed energy generation and demand side management is completed. Our citizenry needs to be truly informed if new utility-scale and transmission projects are necessary to meet energy demand and RPS goals. When assessing these alternatives current legislation and energy policy must not be used to evaluate the potential for distributed generation and demand side management. Informed and existing examples of up-to-date legislation and energy policy must be used to assess the true potential of distributed generation and demand side management. Policy is the key to creating the industry boom that will generate the products and services for local generation and technologically assisted conservation that can accomplish California's goals. It is important to note responsible energy policy already exists and is demonstrating that potential. Here are a few examples of these viable alternatives:

- Germany and Spain are currently installing 2000mW of PV solar each year on residential and commercial rooftops and brownfields. Tax incentives, low interest loans and attractive feed-in-tariffs are the energy policies that have made this possible.
- The Cities of San Francisco and San Jose and others have begun to implement or are considering adopting policy and programs based upon the European precautionary principle that if adopted by California our state could meet its RPS goals within 10 years without building one new utility-scale project or transmission line.
- Recent improvements in the industry have reduced the cost of installing PV solar on rooftops or brownfields at or very near the point-of-use range from \$2,750 to \$3,850/kW as compared to thermal solar at \$4,200/kW and when transmission costs are added rises to \$6,200/kW.
- European countries have begun feed-in-tariffs for small wind generating projects at point-of-use. In fact the states of Michigan, Illinois and Rhode Island are proposing feed-in-tariff laws for small wind projects.

In summary it is the position of this alliance that RPS goals adopted by California are being carried out in a policy environment that only embraces the 20th century renewable technologies of remote generation and the 19th century technology of power line transmission. Consequently, we implore you to stop the fast-tracking process, go back to our governor and legislatures and let them know **the real barrier to transmission is transmission itself**. Tell them we need the new legislation and energy policy that will enable California to catch-up to Europe's Responsible Energy Policies and do California's part to protect the planet without sacrificing our environment.

Respectfully submitted,

The Alliance for Responsible Energy Policy