

Comments by Ron Dickerson

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In the Matter of: □□Preparation of the □*2009 Integrated Energy Policy Report*□ (2009 IEPR)

Docket No. 09-IEP-1G □ Docket No. 03-RPS-1078 □ NOTICE OF JOINT COMMITTEE □ WORKSHOP RE: "Electricity System □ Implications of 33 Percent Renewables"

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Introduction

I am a person who has been affected by transmission planning processes led by transmission owners, operators, and state regulatory agencies. While all Californians shall be affected by these processes, my personal experience may be amplified by the fact that our home and land are adjacent two separate transmission lines owned by two different investor owned utilities. Furthermore neither of these utilities supplies our home and land with electricity. One hundred percent of our electricity needs are provided by our own photovoltaic and energy storage system. So I am somewhat perplexed by the struggles and uncertainties addressed by various stakeholders to integrate 33 percent renewables.

As a citizen and former ratepayer in the state of California, I appreciate the invitation to provide comments in regards to the fore mentioned workshop.

I have become a former ratepayer because it has become practical and economical to not participate in the purchase of electricity delivered by an ever expanding and increasingly destructive grid. I made this decision after nearly two years of attempting to obtain information and meaningfully participate in different processes, at different agencies, that are collectively called transmission planning, for lack of a more appropriate term. While I have hoped for clarification regarding these processes, all I personally have obtained is vast uncertainty...

## Observations

This uncertainty is rooted in the fact that this network called the grid, that has formerly been designed to facilitate the wholesale and retail sale of electricity, is now being asked to deliver us from the evils of global climate change. While this is an admirable goal, the basic architecture and market design that have developed the grid seem to be contrary to achieving any real reductions in GHG. Nor do I see any evidence that current grid expansion plans will reduce GHG. It is increasingly obvious to me that currently proposed grid expansion is all about facilitating the wholesale distribution of electricity. While centralized renewable energy generation maybe delivered on the proposed transmission lines, so will fossil fuel generation. Market development, price volatility and the reliability of centralized RE generation are obvious issues that impact the system. Future IEPR workshops should provide more clarification regarding these impacts, for the edification of the Public, and as is often remarked, to have no regrets.

It is worth noting that although the Commission's process is called integrated, the various studies presented at the workshop seemingly used different methodologies resulting in summaries that failed to reach similar conclusions. Industry stakeholders discussed the affects of lack of collaborative methodology. Additionally the lack of forward thinking that may have skewed the results...

## Uncertainties

Will policy at the Commission be based on a mix of these results?

How will it be determined which of the various scenarios will likely occur?

Will policy favor certain technologies or development of resources in certain geographic areas?

Which of the scenarios investigated would provide greatest reduction in GHG emissions?

Is there any consideration that different RE generation scenarios may necessitate more fossil fuel generation?

Is there any consideration of the GHG impacts by the construction and maintenance of the RETI phase 2A proposed facilities?

Will the implications of integrating 33% renewable energy mean there will be an equal reduction of fossil fuel generation?

What are the implications of the spin required to back up 33% intermittent resource?

Does centralized RE generation require more spin to reliably integrate than distributed localized RE generation?

Does centralized storage (PSP for example) provide more efficient back up than localized storage, and are the GHG impacts being considered?

Centralized vs. Distributed RE scenarios

The CPUC study discussed at the workshop suggests that High Distributed Generation scenario may provide benefits equal to or surpassing the other scenarios investigated. Exhibit D of the Executive Summary shows that in terms of policy objectives, this is the superior approach. Even in the policy cases of

costs and technology development, it could be strongly argued that roof top PV has historically proven to perform well, and may be on a trajectory to really change the energy picture in California. Industry and market participants are quick to tout the benefits of their various elements in the generation, transmission, and so called ancillary services of electricity, yet few will truly advocate for the benefits of generation on the ratepayer's side of the meter. Conservation and Demand Response are good starts, however the transformation benefits of High DG behind the meter, could be incredible as it has the potential to reduce load growth without an economic recession, and could even lead to reducing the GHG footprint in the transportation sector.

Obviously this would be contrary to the way energy industry investors would vision a 33% RE future. I would suggest that perhaps the time has come for a little less centralized approach. I'm sure there are some great minds in the industry that could steer the course towards a DG future and still provide a reasonable profit to their shareholders. Ratepayers and the rest of us would appreciate it...

Thank you for your consideration.

Ron Dickerson