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February 15, 2011

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 02-REN-1038
1516 Ninth Street
Sacramento, CA 95814-5504

**Re: Comments on the Proposed Renewable Planning and Permitting Program Grants
(Docket # 02-REN-1038, RP3 Grant)**

Dear Ms. Neidich:

On behalf of Joint Venture: Silicon Valley Network, I would like express our support of the California Energy Commission's Renewable Planning and Permitting (RP3) Program, and provide comments that we hope will be taken into consideration as the program is further developed.

In response to the Commission's request for comments, I would like to submit the following suggestions: 1) allow organizations other than local government agencies, such as nonprofit organizations, to apply for RP3 grants; 2) include preference for grant requests to collaborative efforts; 3) include an element that would encourage local government agencies to install renewable energy systems on their own facilities; and 4) make funding available for replication of models that accelerate deployment of renewables in California. These suggestions are supported through explanations and additional information in the paragraphs below.

But first, allow me to provide some context: Through Joint Venture's Public Sector Climate Task Force, we have recently convened the largest multi-agency procurement of renewable energy in the country to date. The Silicon Valley Collaborative Renewable Energy Procurement (SV-REP) Project is a collaborative effort consisting of nine local government agencies with 70 solar installation sites and over 14 MegaWatts of power generation potential. This program is expected to generate approximately \$70 million in local economic activity, and more than 300 jobs while piloting an innovative model of regional collaboration that was designed to be replicable and scalable. This model is already being replicated by the Environmental Protection Agency's Green Power Partnership in the Washington D.C. metro area, and several other regions across the country are actively looking at launching similar efforts. Additionally, Joint Venture is looking into opportunities to partner with the Bay Area Air Quality Management District and the Association of Bay Area Governments to expand the SV-REP model to the greater Bay Area in 2011.

Providing planning and permitting assistance to local government agencies through the RP3 Program will undoubtedly be beneficial in streamlining renewable energy installations. However, it is important to take into consideration a few other factors in promoting and encouraging renewable energy installations such as innovative models of regional collaboration, and local government agencies leading by example and installing renewable energy systems on their own facilities. Relating to these factors, our four suggestions are enumerated below.

1. Allow organizations other than local government agencies, such as nonprofit organizations, to apply for RP3 grants. By opening up grant funding to other organizations, you will enable regional collaborative efforts which can achieve results more quickly and economically than the efforts of one local government agency alone. In Silicon

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Valley alone there are several regional organizations in addition to Joint Venture that are working on renewable energy projects, some specific to permitting, including (but not limited to) the Bay Area Climate Collaborative (BACC) and SolarTech. By streamlining and unifying efforts between local government agencies across the region, these organizations have the ability to champion on-the-ground projects with speedy and tangible results. To illustrate the need for funding non-governmental organizations, the SV-REP project is now completing the contract negotiation phase and entering into the implementation phase. The participating public agencies will, for the most part, be self-permitting their sites, and we anticipate encountering some challenges through this process. In order to best learn from these challenges, we need to track the progress of these solar installations and compare key metrics and timelines to industry benchmarks. However, due to a lack of available funding to support this work, Joint Venture is currently not planning on facilitating this phase of the project. In this case, we have an incredible opportunity to use the SV-REP to collect information about challenges and solutions in permitting and expediting the installation of renewable energy systems that will not proceed due to lack of funding.

2. Include preference for grant requests to collaborative efforts. We suggest that preference for grant funding be given to collaborative efforts. As seen through the SV-REP, collaborative efforts can save a significant amount of time and money, as well as streamline and unify regional efforts. Again using the SV-REP as an example, the participating local government agencies will save an average of 12% through collaboration alone. In addition, participating agencies saved approximately 75% in upfront costs including staff time and access to technical expertise.

3. Include an element that would encourage local government agencies to install renewable energy systems on their own facilities. In Silicon Valley, an overwhelming majority of local government agencies have expressed a desire install renewable energy systems, likely for these three reasons: 1) to save money on electricity bills, 2) to decrease greenhouse gas emissions, and 3) to lead by example, encouraging local residents and businesses to install renewable energy systems. Regardless of the desire to move toward renewables, however, local government agencies are facing major challenges in these efforts. Some challenges can be overcome through collaboration (e.g., transaction costs, lack of understanding of financing options and available incentives) and through 3rd party financing (e.g., the barrier of high upfront costs can be overcome by using a Power Purchase Agreement). One challenge that has not yet been addressed is the need for assistance with first-pass site selection and obtaining professional solar evaluations and/or structural assessments, which need to be done in order to move forward with a renewable energy installation. We suggest that the RP3 program make funding available to help local government agencies access technical expertise in the early planning stages for renewable projects. Providing support for public-sector renewable energy installations will enable local government agencies to lead by example, with measurable economic and environmental benefits. Additionally, by installing renewable energy systems on their own facilities, local government agencies will be able to better determine the roadblocks associated with permitting these systems, and can make changes accordingly that will then streamline the process for future residential and privately-owned commercial installations within their jurisdictions.

4. Make funding available for replication of models that accelerate deployment of renewables in California.

Models of regional collaboration, such as the SV-REP Project, have demonstrated the power of collaboration in expediting renewable energy deployments in the public sector while saving money, decreasing greenhouse gas emissions, and stimulating the local economy. Other regional models, such as the City of San Jose's SunShares - Employee Solar Group Buy Pilot Program, demonstrate the ability of collaboration to drive down the cost of residential solar installations and provide resources to make solar power more accessible. These are just two examples of replicable and scalable models that could gain a great deal of traction and implementation should funding become available through the RP3.

We believe that the RP3 program has the potential to have a measureable impact on renewable energy installations throughout California, and we urge the Commission to take the above suggestions into consideration in the development of the program.

Sincerely,



Russell Hancock
President & Chief Executive Officer