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BEFORE THE CALIFORNIA ENERGY COMMISSION

In the Matter of the Implementation of
Renewables Investment Plan Legislation

Docket No. 02-REN-1038

COMMENTS OF THE LARGE-SCALE SOLAR ASSOCIATION ON THE PROPOSED RENEWABLE PLANNING AND PERMITTING PROGRAM GRANTS (RP3 GRANTS)

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ON THE PROPOSED RENEWABLE PLANNING AND PERMITTING PROGRAM
GRANTS (RP3 GRANTS)**

The Large-scale Solar Association (LSA)¹ submits these comments in response to the California Energy Commission's (CEC) February 1, 2011 request for comments on the proposed renewable planning and permitting program (RP3) grants. As described in the request for comments, the initial phase of the RP3 is a grant program to assist local governments in the permitting of renewable generation facilities. LSA supports this effort to provide local governments with the tools and expertise to efficiently permit renewable generation facilities.

California has been on the forefront of developing policies to promote renewable energy and to ensure the siting of renewable generation facilities in an environmentally sound manner. Through their permitting responsibilities, local governments play a critical role in meeting the state's clean energy and climate goals. LSA applauds the CEC for ensuring that local governments have access to the resources and information needed to efficiently and effectively process

¹ LSA represents 12 of the nation's largest developers and providers of utility-scale solar generating resources. Collectively, LSA's members have contracted with utilities in California and the West to provide more than 7 gigawatts ("GW") of clean, sustainable solar power. Our members develop, own and operate various types of utility-scale solar technologies, including photovoltaic and solar thermal system designs. LSA and its individual member companies are leaders in the renewable energy industry, advancing solar generation technologies and advocating for policies that ensure environmentally appropriate solar generation facilities to meet the state's renewable and greenhouse gas goals.

permits for renewable generation facilities. Until recently, many agencies have had little or no experience with permitting for large-scale solar generation. The RP3 grant process will help provide local governments with the needed tools to evaluate and permit clean energy developments in their respective jurisdictions.

In these challenging economic times, local governments face serious staffing and financial constraints. As the CEC recognizes in its request for comments, permitting renewable facilities can be challenging for local officials, particularly given these budgetary limitations. The RP3 grant program will help fill the gaps and facilitate the development of a new clean energy industry, which will, in turn, provide needed jobs and economic benefits for local jurisdictions. In the case of large-scale solar, many of the generation facilities will create new jobs in areas of California hit hardest by unemployment.

LSA appreciates the opportunity to comment on the CEC's RP3 grant program and looks forward to working with local governments to move California towards a clean energy future.

Respectfully submitted,

/s/ Kristin Burford

February 15, 2011