



Center for Energy Efficiency and
Renewable Technologies
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July 14, 2011

California Energy Commission
Dockets Unit, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

RE: Docket No. 09-Renew EO-0 1
Center for Energy Efficiency and Renewable Technologies'
Comments on the DRECP Acreage Calculator

DOCKET 09-Renew EO-1
DATE July 14, 2011
RECD. July 14, 2011

Dear California Energy Commission,

The Center for Energy Efficiency and Renewable Technologies (CEERT) appreciates the opportunity to comment on the acreage calculator that the California Energy Commission (CEC) developed for the Desert Renewable Energy Conservation Plan (DRECP). We would also like to thank the CEC for the work they have invested in the calculator.

There is, however, a significant shortcoming of the proposed calculator in our opinion because it fails to provide for an overall "limit" on renewable energy development for the entire region, as required by the Natural Communities Conservation Plan (NCCP). To correct this deficiency, CEERT suggests the DRECP consider taking the following steps:

1. We believe 2030 should be adopted as the timeframe for the development plan. Sooner than that and the current project queue will disproportionately skew the results, while lack of visibility beyond 2030 may yield results which unduly accelerate or impede near term development.
2. The assumptions underlying the scenarios should be consistent with those of prior studies conducted by state agencies; in particular, we believe using updated data from the PUC's planning efforts would both save time and provide a useful common basis for comparison.
3. While evaluating a range of development scenarios can be a useful tool for looking at different levels of resource development, CEERT strongly suggests that one of the scenarios examined should be development of the full resource potential of the DRECP area. While it may become

desirable at some point to look solely at particular sub regions of the DRECP area, the fundamental questions should be addressed for the entire resource universe as a whole.

CEERT is most concerned that the output of the calculator not be used to arbitrarily foreclose the amount of land available for future renewable energy development. Within the development parameters of the NCCP there must be flexibility to allow adjustment and repositioning of projects as site-specific concerns arise and to provide any needed buffer. Experience with current and pending projects in the DRECP region has demonstrated the value of such flexibility as each project has been refined and some relocated to address concerns identified in the siting process. These site-specific concerns create a "dead zone" around projects and can impact the siting of adjacent projects. To avoid converting solutions into obstacles we favor a "soft" line NCCP to maximize project siting flexibility within the larger context of plan compliance.

Thank you for your consideration,

A handwritten signature in black ink, appearing to read "V. John White". The signature is fluid and cursive, with a large initial "V" and a long, sweeping underline.

V. John White

Executive Director