SIERRA CLUB CALIFORNIA

July 20, 2011

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 11-IEP-1A
1516 Ninth Street
Sacramento, CA 95814-5512

Electronically submitted to: docket@energy.state.ca.us

RE: California Clean Energy Future, Docket No. 11-IEP-1A
Committee Workshop: California Clean Energy Future held July 6, 2011
Preparation of the 2011 Integrated Energy Policy Report (2011 IEPR)

Sierra Club California appreciates the opportunity to provide comments on this workshop, **California Clean Energy Future, Docket No. 11-IEP-1A,** as an important component of the 2011 IEPR report.

1. **Renewable Energy Metrics** – We recommend adding an additional section for this report to show progress by program. Examples of programs would be RAM, SB 32 FIT, CSI, etc. This new section would show required or targeted objective and actual progress against the targets at least annually. Where appropriate, actual progress would be shown by utility.

2. **OTC Phase Out Compliance** – We recommend expanding this "Data Reference" report and re-titling it to become, "Non-renewables Supply Changes". This report could then show changes in supply by various categories of non-renewables such as OTC, Coal (expiration of contracts), Nuclear, Natural Gas fired generation changes (other retirements, repowerments or additions), etc.

3. **Two new reports designed to support mid-course corrections when needed** – One of the purposes of these new metrics and the annual California Clean Energy Report, is to track progress, or the lack thereof, in order to identify problems early on, do root cause analysis to determine the causes of those failures and then implement corrective action to get the program back on track. Any well thought out plan should include inclusion of key risks to success, pre-planned steps to reduce that risk and the ability to track those potential risks. Two significant potential problem areas are failure of projects to get built and obstacles to interconnection.

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a. **Failure of projects to be built** – an additional report could be added to identify all of the project applications that have been made, the number and percent of those which are not built, the reasons why they failed, recommended actions the State Energy Agencies and/or utilities can take to reduce the rate of failures in the future and then the progress in implementing those corrective actions.

b. **Removal of Obstacles to Interconnection** – Difficulty in interconnection is a well-known problem and there are several programs under way addressing them including the CPUC's ReDEC program, the CPUC's proceeding on Storage and Integration, SB 17 Smart grid Program and others. Including a high level summary report on the status of key initiatives through these programs would be very helpful to the public to gain an overview of progress in this critical area without having to search for them through each of these programs independently. And yes this would not be an easy report to design but then it is the very complexity of these obstacles that make it so difficult for generators to get interconnection expeditiously thus increasing project failures, increasing project costs and slowing down the timeline for achieving timely increases in RPS.

4. Storage Assumption – The CCEF calls for a target of 1,000 MW of storage by 2020. While it is helpful to have a metric on storage and give it the visibility and attention it deserves, this target amount may or may not be sufficient. The June 2010 report from KEMA prepared for the CEC entitled, "Research Evaluation of Wind Generation, Solar Generation, and Storage Impact on the California Grid" describes a potential need for about 4,000 MW of storage. However, new information from KEMA shows how Germany and Spain have utilized other mechanisms to assist in integrating higher penetrations of intermittent renewables. The real number could well be somewhere between this range. It might be well to put in a placeholder target higher than 1,000 but subject to change as progress is made in the CPUC's Storage and Integration proceeding (Skinner 2514).

5. Needed Transmission to Support 8,000 MW of large Scale Renewables – Please refer to our previously submitted comments on the 5/17 IEPR Workshop on Transmission Docket No. 11-IEP-1E, 11-IEP-1G Transmission Planning for Renewables.

Thank you for your consideration.

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cc: Ms. Heather Raitt, Assistant Executive Director on Climate Change