



October 15, 2011

Robert Weisenmiller
Chair and Presiding Member
IEPR Committee
California Energy Committee
Dockets Office, Ms-4
1516 Ninth Street
Sacramento, CA 95814

DOCKET

11-IEP-1G

DATE OCT 15 2011

RECD. OCT 17 2011

RE: Docket No. 11-IEP-IG, Renewable Power: Status and Issues

Dear Chair Weisenmiller,

Environmental Health Coalition (EHC) and the California Justice Environmental Alliance (CEJA) appreciate the opportunity to continue to weigh in on the many facets of the IEPR document. Today we submit our comments on the report Renewable Power: Status and Issues.

Develop Methodologies to Quantify the Benefits of Distributed Generation

We agree with the staff report that renewable energy provides benefits that have not been adequately quantified, such as the business and economic development benefits, air quality improvement, reduced dependence on natural gas and other fossil fuels, and helping to shave peak load. We urge the CEC and the CPUC to develop methodologies that better quantify these benefits, especially distributed generation.

Environmental Justice Analysis is Inadequate

The report highlights Environmental Justice and relates the concern of environmental justice organizations about the ongoing siting of fossil fuel plants in these already-stressed and already-polluted communities. CEC states it has processes in place to evaluate the disproportionate impacts these communities may experience when evaluating new power plants, but ultimately concludes that the population of California is 57% minority and thus it is likely that new power plants will be located in areas that could affect minority communities.

That appears to be a lazy and incomplete analysis. While the population of California is indeed a majority minority, it does mean that every community with minorities is an environmental justice community. It is the combination of such factors as income, race, ethnicity, air pollution, respiratory ailments and other health impacts with existing fossil-fuel power plants, refineries, freeways, diesel trucks, etc. that make environmental justice communities particularly inappropriate for the siting of yet more fossil fuel

infrastructure. It is also the diminishing social and economic opportunities as a result of all these issues that weigh down our communities. We suggest the CEC reframe this issue.

Further, as EHC and Communities for a Better Environment testified at the May 11th IEPR hearing, our communities want and deserve installation of renewable energy technologies in their neighborhoods. Given all the negative effects our communities have suffered, it is time for our communities to benefit from these billions of dollars in new infrastructure investment. Not only do we believe that investment in our communities can lead to neighborhood revitalization and an improved sense of pride and place, but also it can offer a new relationship between energy and the economic development of a community. Instead of starving these communities of valuable assets and local revenue by shipping wealth away, we can bring in prosperity and opportunity to local energy businesses and entrepreneurs.

Increase Amount of Governor's 12,000 MW DG Goal into Low-Income, Communities of Color

We appreciate the modifications made to the CEC staff's analysis of meeting the Governor's 12,000 MW goal for distributed generation made after public input. We were pleased to learn that one of the major modifications was to include "more emphasis on development in low-income areas." We agree with the assessment of reaching 564 MW of solar PV installation through full implementation of SASH and MASH under CSI/behind the meter. Two additional comments:

1) The CEC admits there is not enough funding (or rather, barely any funding) in CSI to fully implement either of these two programs to reach the originally designed potential, but does not state how funding would be found. This is a missing piece of the document. We agree with the goal, but urge CEC to delineate from where funding would come to implement these two valuable programs.

2) Installing 564 MW in low-income communities out of 12,000MW is not nearly enough. It's not even 10% of the total. We recommended 6,000 MW come from 0-1MW projects located in and on commercial/residential buildings, parking lots and vacant lands. A focus on micro-scale renewables would benefit environmental justice communities as well as low-income communities in rural areas. If we combine the suggested CSI program implementation of SASH and MASH with a feed-in-tariff or wholesale program focused on these micro-scale installations, we can move closer to the 6,000MW and create the jobs and economic development benefits that our state desperately needs. As the Berkeley report showed last year, you get up to 3 times more economic benefits by building projects within existing communities where the load is. It is just common sense.

Fill the 3,200MW Gap in the Governor's DG Goal with <1 MW Renewable Systems

Since the existing renewable programs (behind the meter or wholesale) do not meet the Governor's goals, it is time for a new program to fill that 3,200 MW gap. We urge the development of a wholesale feed-in-tariff program focused on 0-1MW commercial systems. While the CEC may not be able to develop a new program through the IEPR document, the CEC can make recommendations about how to fully reach the Governor's goals. Given the business and economic development benefits to a micro scale program, potentially creating thousands of jobs for unemployed yet trained Californians, as well as the needs of low-income urban and rural communities deprived of wealth generation and good health for decades, this is a powerful opportunity.

We reference the LA Business Council studies, named in the report, that highlight the opportunities for solar installations and job creation in low-income communities with large multifamily structures that would result from a feed-in-tariff focused on 0-1MW commercial units.

In fact, in you section titled "Challenges for Workforce Development" in Chapter 10 on pg. 269, you mirror this recommendation by stating:

A challenge in the deployment of DG is to channel investment into disadvantaged communities so that they may enjoy both the environmental and job creation benefits. This will require strategies to incentivize installation of small scale renewables in renter and owner-occupied residential buildings as well as commercial buildings, parking lots and ground mounted locations.

Again, we urge the CEC to recommend this program idea into the analysis for meeting the 12,000 MW DG goal.

Solar Gardens are Not the Answer

One final point we want to highlight is that a lot of focus is spent on Solar Gardens as the solution to making solar accessible to renters, those who are not able to afford solar or those who cannot technically install solar on their home. While Solar Gardens can play a role in diversifying solar offerings, it is not the solution to making solar accessible to low or low-moderate income residents. Our community members are struggling to pay their bills, let alone pay more for a solar panel located outside of their community. Tellingly, data from SMUD's solar garden program showed that participants in their program were higher income folks from the same demographics currently purchasing solar systems (white, upper middle class), and not the lower income working class community members.

Thank you again for listening to and integrating our comments and concerns.

Sincerely,



Nicole Capretz
Associate Director
Environmental Health Coalition