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Chairman Bob Weisenmiller  
Commissioner Karen Douglas  
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**DOCKET**

**11-IEP-1G**

DATE Nov. 02 2011

RECD. Nov. 03 2011

Re: California Energy Commission Docket No. 11-IEP-1G: Comments on Executive  
Summary for Renewable Power in California: Status and Issues

Chairman Weisenmiller and Commissioner Douglas:

Thank you for the opportunity to provide comments on the IEPR Committee's Revised  
Executive Summary for the draft "Renewable Power in California: Status and Issues".

Two of the strategies identified in the Revised Executive Summary accurately focus on the  
primary barrier facing development of dispatchable renewable resources in California: the  
need to reflect the broader system and environmental values of these technologies in the  
State's procurement process. Strategy #2 identifies the need to evaluate the full cost of  
renewable energy projects and make a value assessment of "various system and non-energy  
benefits". Strategy #3 identifies the need to minimize integration needs at the distribution  
and transmission level and parenthetically mentions the need for procurement of dispatchable  
renewable generation.

As implied by these strategies, it is important that the State's energy policies, procurement  
processes, and electricity tariff structures reflect the benefit of adding dispatchable renewable  
resources to meet some portion of our electricity needs. The benefits of these resources and  
integrated energy storage systems have been widely discussed in meetings at and reports  
from the CEC, CPUC, CAISO, and other organizations. While we fully support the studies  
proposed in Strategy #2, we are concerned that the time required for these studies may further  
delay efforts to provide the policy direction and procurement incentives needed to actually  
get these facilities built and operating. Our recommendation would be that the State  
implement Strategy #2 and Strategy #3 in parallel rather than sequentially.

Thank you again for your efforts to help California meet its renewable energy and climate  
goals and particularly for recognizing the critical role of dispatchable energy resources and  
energy storage.

Sincerely,

Felicia L. Bellows  
Senior Vice President of Development