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Chairman Bob Weisenmiller
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DOCKET	
11-IEP-1G	
DATE	Nov. 02 2011
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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