

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

November 7, 2011

**DOCKET**

**11-IEP-1G**

DATE Nov 07 2011

RECD. Nov 07 2011

RE: IEP comments on the Revised Executive Summary for the Draft Renewable Power in California: Status and Issues Report (Docket No. 11-IEP-1G).

The Independent Energy Producers Association (IEP) appreciates the opportunity to comment on the California Energy Commission's (CEC) Integrated Energy Policy Report (IEPR) Revised Executive Summary for the Draft Renewable Power in California: Status and Issues Report, released October 26, 2011. The addition of these "Recommended Strategies" to the Executive Summary will guide the state toward meeting its environmental and economic goals in the clean energy sector.

The five strategies that the Energy Commission recommends in the Executive Summary include: (1) identify and prioritize geographic areas for both renewable utility-scale and distributed generation development; (2) evaluate the costs of renewable energy projects including the costs associated with integration, permitting and interconnection; (3) develop a strategy that minimizes integration needs at the transmission and distribution level; (4) promote incentives for renewable technologies that create in state jobs; and (5) promote and coordinate existing state and federal financing and incentive programs. Each of these long-term strategies are worthy policy goals. However, none of these strategies identify the near-term barriers to development faced by developers, which could continue to be hindrances going forward if not addressed. Accordingly, **the Energy Commission should include in the list of recommended strategies, an additional strategy to: *Identify Near-Term Barriers to Development.***

The goal of this approach should be to identify the top five near-term barriers to development, while prioritizing how to deal with those barriers over the next 18 months. Near-term barriers to development may include, but are not limited to, (1) interconnection challenges, (2) permitting timelines, (3) financing hurdles, etc. In order to effectively implement the other five long-term strategies, the Energy Commission must seek solutions to the near-term barriers that exist today. If we do not ask why the near-term barriers to development exist, the above strategies will be plagued with the same developmental problems that we are experiencing now.

IEP thanks the Energy Commission staff for their hard work on the *Renewable Power in California: Status and Issues Report* and for the opportunity to comment on this Revised Executive Summary.

Respectfully submitted,



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