

Joint Comments of,
Save the Foothills Coalition and California Consumers Alliance

In the matter of,
Preparation of the *2011 Integrated Energy Policy Report*
(*2011 IEPR*)

Re: Docket No. 11-IEP1G Request for Comments

The Save the Foothills Coalition (STFC) and the California Consumers Alliance (CCA) appreciates the opportunity to submit written comments on the revised Executive Summary for the draft *Renewable Power in California: Status and Issues*.

The STFC and CCA appreciate Staff's efforts to cover the exhaustive topic of Renewable Power in California. Although we agree with many of the expressed views of status and issues, we do not agree with others.

The inclusion of recommended strategies should be considered a final product of a process that first reaches consensus among all participants. While the high level nature of staff's revisions are generally supportable, there are certainly many other elements of strategic planning for renewables that should be accounted for in the development of final recommendations, including an emphasis on controlling the costs borne by consumers. Contrary to prevalent views, greater penetration of renewables is a path towards stabilizing and even reducing the overall price of electricity. Engagement of consumers is key to unlocking that future.

We believe consumer groups bring a unique and different perspective to the discussion. Consumer groups therefore need to be part of these discussions. Based on invited presenters at recent IEPR workshops, the discussion seems, so far, to be one sided and controlled by proponents of transmission system expansion to the exclusion of other alternatives.

The STFC and CCA appreciate the intent of the report, which is stated as *"...to reach consensus among stakeholders on renewable status and issues as the first step in developing a strategic plan to increase renewable generation and transmission infrastructure in the state."* We note that the Federal Energy Regulatory Commission's Order 1000 similarly concluded *"...absent timely and meaningful participation by all stakeholders, the regional transmission planning process will not determine which transmission project or group of transmission projects could satisfy local and regional needs more efficiently or cost-effectively."*

While the STFC and CCA recognize that the IEPR process is not a regional transmission planning process per se, the principle of inclusion of all stakeholders should be applied in the Commission's strategic planning process, which, not incidentally, includes increasing transmission capacity as a primary goal. Because consumers ultimately pay for the cost of electricity infrastructure, it is imperative that opportunities for consumer participation are on par with all other invited stakeholder groups; consumers should not just be spectators.

It is our sincere hope that the Commission will provide opportunity for key consumer stakeholders to participate in the strategic plan for Renewables that is equal to that of the recently invited workshop presenters. As active participants in California's regional transmission planning process, the STFC and CCA submit that we can provide useful, factual and detailed analysis concerning issues involved in implementing the RPS.