

Public Comments in the matter of Preparation of the 2011 Integrated Energy Policy Report,  
Docket 11-IEP-1G.

Submitted by:  
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On behalf of  
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**Executive Summary**

High Desert Power Authority agrees with the general conclusions and recommended strategies as described in the Executive Summary of draft *Renewable Power in California: Status and Issues* report.

However, regarding the Transmission Issues section starting on Page 9, Table ES-5 is incomplete in that it does not include the AV Clearview Transmission Project that has been under development for over two years. Just as importantly, the Table lacks critical data that is required for the CEC and other agencies to make any meaningful evaluation of impending transmission projects.

Specifically, without inclusion of 1) some measure of economic cost (for example, cost per MW of renewable generation accessed) and 2) some measure (even if only qualitative) of the environmental impact of the various transmission projects, then the CEC runs the risk of painting itself in the same corner the CAISO finds itself: inclusion of projects in the Statewide Transmission Plan that are completely devoid of any economic or environmental evaluation or consideration.

The CAISO's ineffectual process has had serious consequences: projects already included in the CAISO Statewide Transmission Plan have permitting challenges so great that they are unlikely to be overcome in the CPUC permitting process, resulting in more uncertainty, more delays, less jobs and greater cost to the ratepayers. The objective of this CEC process is not to meet the RPS standards *at any cost*, but to meet our renewable energy goals in the most efficient, economical and environmentally sensible manner, which the hallmark of prudent governance.

Most critically, as described below, the AV Clearview Project is *the only* transmission project that will enable ARRA-driven projects east of Kramer to be built and on line before the 2016 deadline regarding the expiration of the Section 48 Investment Tax Credit.