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Comments of the Natural Resources Defense Council (NRDC) on the Executive Summary for Renewable Power in California: Status and Issues Docket No. 11-IEP-1G; November 7, 2011

Submitted by: Carl Zichella, Director of Western Transmission

I. Introduction and Summary

The Natural Resources Defense Council ("NRDC") appreciates the opportunity to offer these comments on the revised executive summary to the draft staff report "*Renewable Power in California: Status and Issues*" ("Draft Staff Report"). NRDC is a nonprofit membership organization with a long-standing interest in minimizing the societal costs of the reliable energy services that Californians demand. We represent our nearly 100,000 California members' interests in receiving affordable energy services and reducing the environmental impact of California's energy consumption. NRDC staff participates in the Western Governors Association's Western Renewable Energy Zone Process, California Transmission Planning Group, and the Western Electricity Coordinating Council's (WECC) Regional Transmission Expansion Planning process. We are actively involved in Federal Energy Regulatory Commission rulemakings, including Order 1000 implementation. We also participate in regional transmission planning in the Eastern Interconnection.

We commend the Commission and its staff for the revised executive summary to the draft *Renewable Power in California: Status and Issues.* ("Executive Summary") NRDC believes that the goals of increased reliance on renewables and protection of our nation's unique and sensitive places are not necessarily in conflict and that prudent transmission policy should consider environmental issues early in the planning process. We support the current revisions but we also note that there is an area discussed at the workshop and included in our comments that was omitted from the Executive Summary and merits a more detailed discussion.¹ In particular, NRDC recommends that the state add a section to the plan that would identify and take advantage of regional energy market opportunities and foster greater cooperation with states in the Western Interconnection as detailed in our previous comments. Thank you for the opportunity to comment on the Revised Executive Summary.

Sincerely,

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Carl Zichella Director of Western Transmission

¹"Comments of the Natural Resources Defense Council (NRDC) on the 2011 Integrated Energy Policy Report (IEPR) Renewable Power in California: Status and Issues," October 5, 2011. p.5