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From: Erica Brand, The Nature Conservancy
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Date: December 3, 2012

Subject: Comments to the "2012 Integrated Energy Policy Report Update – Draft Lead Commissioner Report"

Docket No. 12-IEP-1A

On behalf of The Nature Conservancy, we would like to thank you for the opportunity to provide comments to the *"2012 Integrated Energy Policy Report Update – Draft Lead Commissioner Report"*.

The Nature Conservancy is one of the world's leading conservation organizations. Our mission is to conserve the lands and waters on which all life depends. We have a staff of 3500, including 400 scientists. We work in all 50 states and in 33 countries and are celebrating our 60th anniversary this year. The Nature Conservancy works to find solutions for the development of clean energy, which is vital to California's future, while protecting the state's unique landscapes and ecology.

In the following pages, we provide specific recommendations for the Renewable Action Plan (RAP) outlined within the draft Integrated Energy Policy Report (IEPR).

RAP Strategy 1: Identifying and Prioritizing Geographic Areas for Renewable Development

The following recommendations are applicable to both Recommendation 1 (Incorporate Distributed Renewable Energy Development Zones into Local Planning Processes) and Recommendation 2 (Identify Renewable Energy Development Zones).

We are encouraged by the direction taken in the Draft Renewable Energy Action Plan to identify and prioritize geographic areas for renewable energy development. We appreciate that the Commission has prioritized development within the existing built environment first, followed by lands with negligible habitat value and that are in areas near existing or planned electric system infrastructure.

Concentrating renewable development in zones that are most appropriate for development will ensure that projects are built faster, cheaper and in a manner that is better for the environment, developers and consumers. However, it is important that the zones are constructed using the appropriate scientific and policy framework.

The Conservancy is committed to using our on-the-ground experience and our scientific expertise to strengthen renewable energy planning processes. We are a stakeholder to the Desert Renewable Energy Conservation Plan (DRECP) and have participated in the Bureau of Land Management's Solar Programmatic Environmental Impact Statement (BLM PEIS) planning process. We encourage the Commission to use the lessons learned from these planning processes to inform the strategy to identify and prioritize zones for renewable energy development within the Central and San Joaquin Valleys of California. In addition, the Conservancy has a history of working within the Central and San Joaquin Valleys to protect important ecosystems and biodiversity and it is important that these areas and investments are recognized in the zone development process.

We encourage the Commission to add the following actions to the Action/Implementation Steps to develop the maps (page 45 and 47) associated with Recommendations 1 and 2.

- Use best available science, including landscape-scale ecological assessments and ecoregional plans, to identify preferred development zones with minimal ecological or habitat value.
- Collaborate with environmental and conservation stakeholders to identify areas for development that have negligible habitat value.

A clear, transparent process and methodology for identifying preferred development zones is critical to successful implementation and replication. To emphasize this importance, we recommend the following edit (in bold) to the Action/Implementation Steps identified on page 45.

- "Establish an effective **and transparent** process for identifying preferred development zones that can be replicated throughout the state."

RAP Strategy 3: Minimize Interconnection and Integration Costs and Requirements

We agree with the Commission's finding that environmental and land-use factors are underused in renewable resource scenarios and should be further incorporated into CAISO's Transmission Planning Process (TPP) and the CPUC Long Term Procurement Plan Proceeding (LTPP) (page 57).

Similarly we support the Commission's Recommendation 9: "The Energy Commission should ensure that environmental and land-use information developed through the DRECP is incorporated into renewable resource scenarios used in the CPUC's LTPP and the California ISO's Transmission Procurement Plan process."

Integration of the DRECP information is an important start, but there are environmental and land-use planning resources available outside of the DRECP planning area that should be integrated into the aforementioned planning processes.

We support Recommendation 14 to create a Statewide Data Clearinghouse for Renewable Energy Generation Planning. We agree that this clearinghouse should include environmental considerations important to siting decisions. It will be important that a clear methodology is established for how the environmental criteria, and associated geospatial data, are identified for use and applied in the energy generation planning process.

Strategy 5: Research and Development and Financing

We support Recommendation 26 to increase public researching funding for applied research and development to reduce, resolve, and anticipate environmental barriers to renewable energy deployment in California. We appreciate the emphasis on working with stakeholders to determine research needs and leverage funds.

If you have any questions, please do not hesitate to contact me at (415) 281-0451 or ebrand@tnc.org.

Sincerely,

A handwritten signature in cursive script that reads "Erica Brand".

Erica Brand
The Nature Conservancy

cc: Stephanie Bailey, IEPR author, Stephanie.Bailey@energy.ca.gov