



December 20, 2012

California Energy Commission Dockets Office
ATTN: Eli Harland
1516 Ninth Street
Sacramento, CA 95814-5512

California Energy Commission

DOCKETED
12-GREP-1

TN # 68948

DEC 20 2012

Re: Renewable Energy Planning Grants - Docket 12-GREP-1

Dear Mr. Harland:

I write today on behalf of Mainstream Energy Corp. to help inform the development of the forthcoming grant solicitation offered pursuant to Public Resources Code Section 25619.

Mainstream Energy Corp. is the parent company of REC Solar, a national installer specializing in grid-tied residential, commercial and utility-scale solar electric systems, and AEE Solar, one of the country's largest distributors of renewable energy systems and equipment. With a local presence in all major solar markets and more than 120MW installed, we are committed to bringing solar to the mainstream. Our companies employ more than 800 people, and are headquartered in San Luis Obispo, CA.

Specific answers to questions posed by the Commission are as follows:

- 1) What are the renewable energy and natural resource conservation planning needs and priorities in the qualified counties?

Counties have very real needs in reviewing and updating general plans to assess and account for the potential for renewable energy resources, streamlining (by adopting ordinances or revising processes) and making consistent planning and permitting rules, and developing coherent and updated CEQA documents for the approval of eligible renewable energy generation facilities. We interface with jurisdictions across the state on a daily basis regarding the installation of renewable energy systems, and see a very real need for greater consistency and understanding of the challenges in dealing with jurisdiction-specific codes, rules, processes, and levels of understanding.

- 2) What types of development or revision of rules and policies should be funded through this grant?

In keeping with the previous response, particular focus should be placed on encouraging rules and policies which are consistent with those being adopted in other counties and jurisdictions, and which are widely accepted as creating a more predictable environment for developers of eligible renewable resources. Our company participated - along with many other industry and local government representatives - in the creation of the California County Planning Directors Association (CCPDA) Solar Energy Facility (SEF) Guidance Document and SEF Model Streamlining Ordinance. The goal of this project was to assist counties in their effort to provide a streamlined regulatory climate for the installation of SEF project while protecting important farmland and sensitive habitat. The adoption of these model documents - revised to fit the county's particular needs and situations - is precisely the sort of effort which should be encouraged by this grant solicitation. Less focus should be given to processes by which such ordinances or rules are developed anew within the county,

as such rules are unlikely to have input from a broad array of stakeholders or be consistent with those found in other counties.

7) Do counties plan to work on revisions to rules and policies with regional partners? If so, what regional partners will you work with and what role will these partners play?

Given the relatively small amount of grant funding available via this solicitation and the significant needs which counties have to update and improve their ordinances, general plans, and policies, it would seem imperative that grant funds be leveraged by giving priority to those counties which plan to work in concert with regional partners, which may include municipalities, other public entities, neighboring counties, and renewable energy industry stakeholders.

9) Should the Energy Commission create two funds within this grant solicitation with one providing criteria and funding for counties in the DRECP and one providing criteria and funding outside of the DRECP? If so, how should the criteria and funding amounts for DRECP and non-DRECP counties differ? Should the funding be allocated competitively?

We advocate two funds within the grant solicitation - split between DRECP counties and non-DRECP counties. Not only are the needs and priorities of DRECP and non-DRECP counties different, but splitting funds would also be consistent with legislative intent of Assembly Bill 2161 (Achadjian, 2012) which added San Luis Obispo to the list of counties qualified for these renewable energy planning grants. Ensuring geographic diversity in the awarding of these grants - to maximize their benefit and the cost-effectiveness of grant funding - is a key concern, and we are acutely aware of the very real needs (and renewable energy opportunity) in San Luis Obispo county. Creating two funds within the grant solicitation will help ensure that the non-DRECP counties receive their appropriate consideration in the grant award process.

We appreciate your attention to these matters. Should you have any questions regarding these comments, please contact me at (916) 281-8699.

Sincerely,

A handwritten signature in cursive script that reads "Benjamin Higgins". The signature is written in dark ink and is positioned above the printed name and title.

Benjamin L. Higgins
Director of Government Affairs