

**Comments of the Natural Resources Defense Council (NRDC) on the
2013 Integrated Energy Policy Report (IEPR) Scope**
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I. Introduction and Summary

The Natural Resources Defense Council (NRDC) appreciates the opportunity to offer these comments on the 2013 IEPR Scope. NRDC, representing our nearly 80,000 California members, is a nonprofit membership organization with a long-standing interest in minimizing the societal costs of the reliable energy services that Californians demand.

II. Discussion

NRDC appreciates the effort of the Energy Commission staff during the 2012 IEPR update effort to review the issues regarding regional resource integration, including the importance of coordination to ensure the lowest cost and greatest benefits when integrating resources. The draft 2012 IEPR Update notes that “California should also support advancement of integration services on a regional level.”¹ Specifically, the draft update includes the following recommendation under Strategy 3 to minimize interconnection and integration costs and requirements: “Develop a Dialogue on Distribution Planning and Opportunities for a More Integrated Distribution Planning Process.”²

As such, we strongly urge the Commission to add the following topic under the Electricity scope to carry out the recommendation in the draft 2012 IEPR update:

- Evaluation of the value of regional geographic diversity of resources in reducing the need for reserves for variable generation integration and reducing the cost of renewable electricity.

III. Conclusion

Thank you for the opportunity to comment on the 2013 IEPR Scope. We look forward to working with the CEC and stakeholders on the 2013 IEPR.

¹ California Energy Commission, 2012. Draft *2012 Integrated Energy Policy Report Update*. Publication Number: CEC-100-2012-001-LCD. P.6

² *Ibid* p.61