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March 23, 2012

California Energy Commission  
Dockets Unit, MS-4  
1516 Ninth Street  
Sacramento, CA 95814-5512

RE: Docket No. 09-Renew EO-0 1  
Center for Energy Efficiency and Renewable Technologies' and Large-scale Solar  
Association's Proposed Development Focus Areas

Dear Dave Harlow,

CEERT and LSA would like to thank the Governor's office and the REAT for the opportunity to provide additional development zones to the DRECP and revisit CEERT's previous submissions of additional development areas. At your request we have refined our suggested development zones as well as gathered comments on the RESAs put out by the REAT. We were able to narrow down the combined 4.4 million acres suggested by CEC's RESAs and our last proposal to just over 2 million acres in this proposal. This reduction was achieved by reducing the existing RESAs and refinements to our own zones, while judiciously suggesting an additional 2 areas be considered as zones.

The reduction in development area, requested by the Governor's office, was accomplished with feedback and input from the industry. In addition to input from industry, CEERT and LSA used factors such as conflicting land use, commercial interest, solar resource, and transmission access to highlight the best development areas. This is not a complete list of all the factors that make a project or an area viable, but under the tight time constraints this was the best available data. We look forward to refining these areas in the DRECP and hope they improve as a result of that process.

CEERT and LSA recognize that the amount of land proposed is more than what CEC's calculator suggests is needed by 2050. However, we feel the calculator is only one tool to estimate future development and even that one tool provides a very wide range of acreage estimates from a variety of reasonable assumptions about issues such as nuclear retirement, load growth, energy efficiency, location of renewable energy generation, and electrification of transportation sector. There remains a large amount of uncertainty to what will be developed within the DRECP and uncertainty on how much of each DFA will eventually be occupied by a development footprint. We suggest that this plan be conservative in providing flexibility for the renewable industry to respond to the market in California.

In addition to the uncertainty with the calculator, there is a large amount of uncertainty within the DRECP process for development zones as they are defined at this point. This uncertainty remains because these areas largely occur on private land and have not yet been reviewed and/or agreed to by local governments. These areas also need to be either reviewed or permitted by DFG FWS, CEC, CPUC, Army Corps of Engineers, or military. CEERT and LSA think it is reasonable to proceed with the 2 million acres of DFAs to be analyzed for development potential and conflict with environmental concerns. CEERT and LSA also hope that this becomes the basis for the solar development scenario alternative.

CEERT and LSA would again like to thank you for this opportunity and look forward to working with you to refine the solar development planning of the DRECP in a transparent and open manner. If you have any concerns or need additional information please don't hesitate to contact Anne Baker or Ryan Drobek.

Thank you,

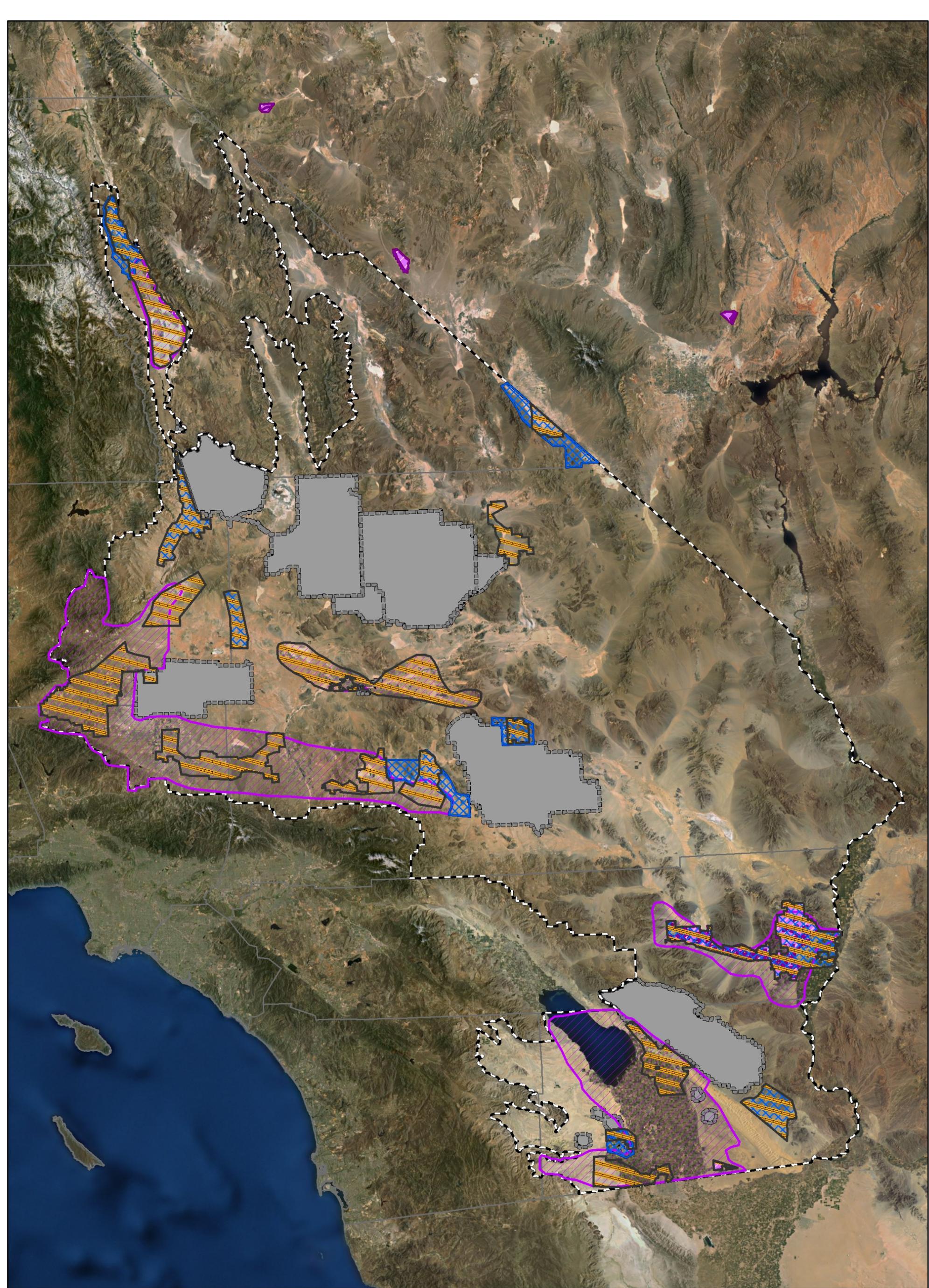


V. John White, Executive Director  
Center for Energy Efficiency and Renewable  
Technologies



Shannon Eddy, Executive Director  
Large-scale Solar Association

cc: Karen Douglas, Commissioner, CEC  
Bob Weisenmiller, Commission Chair, CEC  
Michael Picker, Senior Advisor to the Governor  
Steve Black, Counselor to the Secretary, DOI  
Jim Kenna, California State Director, BLM  
Terry Watt, DRECP Liaison to the Governor's Office  
Chris Beale, Assistant Director, DRECP



## CEERT's and LSA's Solar Development Focus Area Proposal (March 2012)

