

May 21, 2013

**VIA E-MAIL DOCKET@ENERGY.  
CA.GOV**California Energy Commission  
Dockets Office, MS-4  
Re: Docket No. 13-IEP-1E  
1516 Ninth Street  
Sacramento, CA 95814-5512

California Energy Commission <b>DOCKETED</b> <b>13-IEP-1E</b>
TN 70921 MAY 21 2013

Re: 2013 Integrated Energy Policy Report: Joint Lead Commissioner Workshop on  
Consideration of Environmental and Land-Use Factors in Renewable Scenarios and  
Development of Renewable Energy Project Database – Comments of Pacific Gas and Electric  
Company

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to provide comments on the California Energy Commission's (CEC) May 7 Joint Lead Commissioner Workshop titled "Consideration of Environmental and Land-Use Factors in Renewable Scenarios and Development of Renewable Energy Project Database" (May 7 Workshop).

PG&E commends the CEC for initiating a dialogue on the environmental and land-use data that the CEC develops and for advancing the concept of a statewide renewable database so early in the 2013 Integrated Energy Policy Report (IEPR) proceeding. The Workshop presented a variety of stakeholder perspectives, which will serve as a good starting point for more detailed conversations in subsequent workshops.

As it has in past comments, PG&E would like to state its support for efforts to develop a statewide data clearinghouse for renewable energy generation planning.<sup>1</sup> PG&E believes that a statewide database could potentially reduce siting conflicts and advance the pace of renewables development. The data will better inform decision making and renewable energy planning processes, particularly where information on environmental issues can be catalogued so each project does not have to conduct duplicative analysis.

---

<sup>1</sup> Please see page 8 of PG&E's comments on the Draft 2012 IEPR Update, website:  
[http://www.energy.ca.gov/2012\\_energy\\_policy/documents/2012-11-07\\_workshop/comments/Pacific\\_Gas\\_and\\_Electric\\_Comments\\_2012-12-06.pdf](http://www.energy.ca.gov/2012_energy_policy/documents/2012-11-07_workshop/comments/Pacific_Gas_and_Electric_Comments_2012-12-06.pdf)

Without knowing the details and scope of the proposed database, it is difficult for PG&E to provide constructive suggestions. However, at the outset, PG&E offers three recommendations for the CEC's consideration.

First, any data collection effort will have to be conducted in a way that protects customer confidentiality and proprietary information. For example, PG&E has national security obligations so the data PG&E may be able to provide in some areas may be limited or the data may need to be redacted or summarized before being made publicly available. In the 2012 IEPR Update, the CEC showed sensitivity to PG&E's privacy concerns,<sup>2</sup> a position PG&E encourages the CEC to carry over into the 2013 IEPR.

Second, any statewide database should respect existing reporting requirements. For example, the CPUC has already amassed a great deal of information on renewables development through its numerous reporting requirements. These include the Project Status Development Report (PDSR), the newly-required Public Utilities Section 910 report to the legislature filed in early 2013, the Renewable Portfolio Standard (RPS) cost information disclosures required by the legislature, and the annual California Independent System Operator (CAISO) transmission plan, among other reports. Accordingly, in developing any statewide database, the CEC should carefully evaluate what data may already exist. Given that it would take significant effort to consolidate and regularly maintain a new dataset, a new clearinghouse would provide little value if it duplicates data that already exist elsewhere.

Finally, whenever possible, the CEC should go directly to the source for information. For example, any project specific details would be most appropriately collected from developers. In most instances, the project details are available to project developers first and those details may not necessarily have been shared with the entity contracting for the power. Collecting data at an earlier stage in the development process also provides more timely information that can assist planning efforts by state policymakers.

PG&E is committed to continuing to work with CEC Staff and stakeholders throughout the 2013 IEPR proceeding on the CEC's environmental and land-use data and recommendations for a statewide renewable project database.

Sincerely,

/s/

Matthew Plummer

cc: M. Milliron (Misa.Milliron@energy.ca.gov)

---

<sup>2</sup> See page 67 of the 2012 IEPR Update, website: <http://www.energy.ca.gov/2012publications/CEC-100-2012-001/CEC-100-2012-001-CMF.pdf>