



December 18, 2013

To: California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5504
Submitted via email to: docket@energy.ca.gov

Subject: Comments of The Nature Conservancy on the California Energy
Commission's *Distributed Generation Integration Cost Study*.

Docket Number: 13-IEP-1H

1. Introduction and Summary

The Nature Conservancy ("the Conservancy") appreciates the opportunity to submit comments in response to the California Energy Commission's *Distributed Generation Integration Cost Study* ("the study"). These comments are specific to the State Planning Process Pilot outlined in Chapter 6 of the report.

The mission of the Conservancy is to conserve the lands and waters on which all life depends. To achieve that mission, the Conservancy strongly supports the emission reduction goals¹ and renewable energy mandates² established by the state of California to benefit Earth's climate. We urge continued action to transition California to a low carbon energy system; however we feel strongly that this transition should be guided by a comprehensive planning process that has the objective of meeting multiple goals, including reliability, affordability, sustainability and protection of nature.

For these reasons, the Conservancy appreciates that the Commission has taken a leadership position on coordinated land-use, generation, and transmission and distribution planning.

¹ Global Warming Solutions Act of 2006 (AB 32).

² California's 33 Percent by 2020 Renewables Portfolio Standard.

2. State Planning Process Pilot

The Conservancy strongly supports development of distributed renewable energy generation resources (DG). Other than the energy we do not use, distributed renewable energy generation in the built environment, for example on rooftops and parking lots, has the least impact on our natural systems and should continue to be a strong priority for California. Distributed renewable energy generation proposed for areas outside of the built environment are sized to allow flexibility in siting to avoid areas with important conservation values. The Conservancy supports comprehensive planning for distributed generation resources to identify preferred locations for development, as outlined in Chapter 6 of the study.

We appreciate that the Commission has recognized the importance of incorporating land-use and environmental considerations into the planning pilot and has reflected this within the scope. A comprehensive planning process at the distribution level is important, because the key to ecologically sound small-scale and utility-scale facilities is not only size, but where they are sited.

We strongly support the planning pilot goal “to develop a systemwide plan that identifies preferred locations where DG can minimize costs and provide value to the system, and where compatible land uses minimize environmental impacts.”³

3. Conclusion

We appreciate the opportunity to provide comments on the *Distributed Generation Integration Cost Study*. We look forward to learning more about the process and opportunities for stakeholder participation in the planning pilot. If you have any questions, please contact me at ebrand@tnc.org or 415-281-0451.

Respectfully submitted,



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³ Shlatz, Eugene, Nathan Buch, and Melissa Chan. 2013. *Distributed Generation Integration Cost Study: Analytical Framework*. California Energy Commission. CEC-200-2013-007. Page 60.