



California Energy Commission

DOCKETED

13-IEP-1A

TN 72458

JAN 09 2014

January 9, 2014

Email: docket@energy.state.ca.us

Original copy to:

Lead Commissioner: Andrew McAllister
California Energy Commission
Dockets Office, MS-4
Re: Docket 13-IEP-1A
1516 Ninth Street
Sacramento, California 95814-5512

**Re: Comments of Alton Energy, Inc. on
Final 2013 Integrated Energy Policy Report**

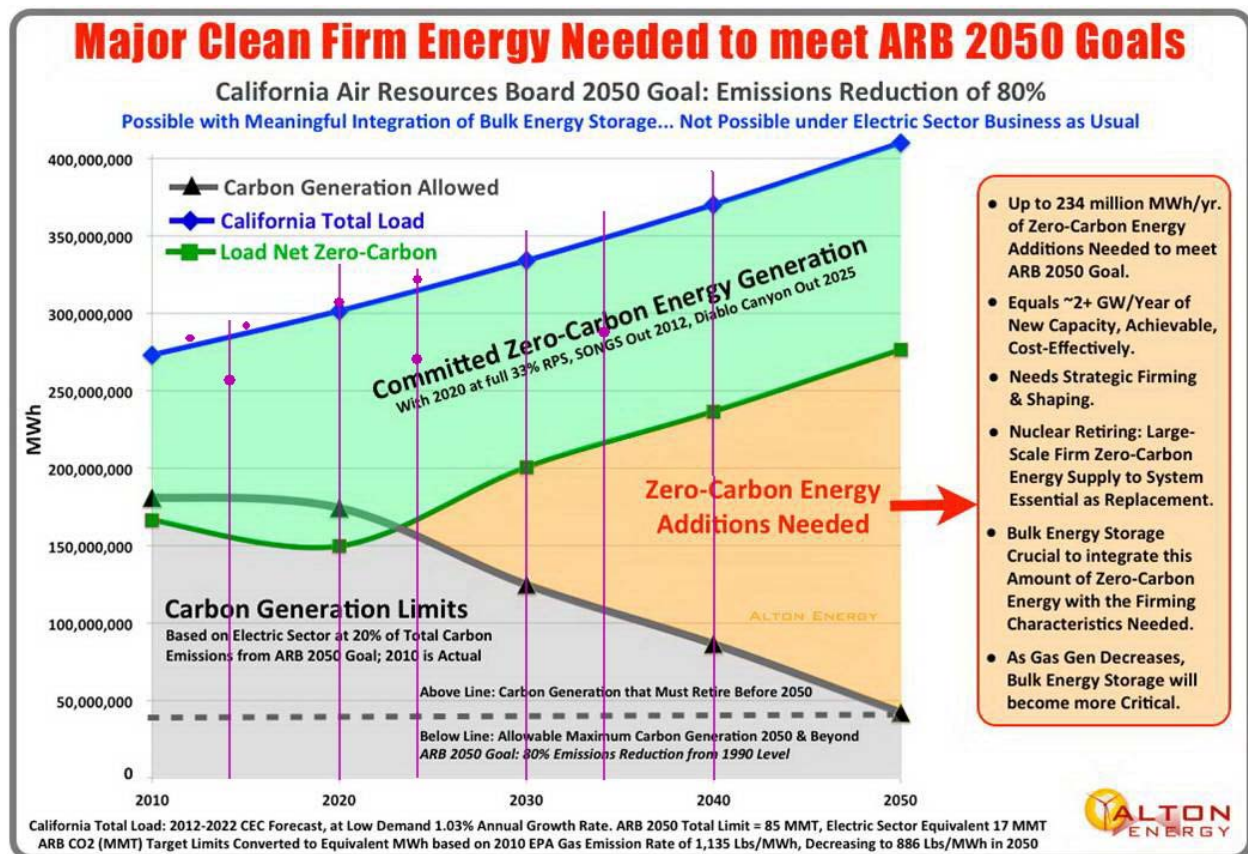
Dear Commissioner McAllister:

Alton Energy has filed important comments in the IEPR process on January 24, 2013, and July 29, 2013 concerning the California Energy Supply progressing to conform with State GHG Goals, consistent with the adopted policies of the Air Resources Board. Unfortunately, we believe the December 20, 2013 LCR substantially misses the well document need that we have previously commented upon, and we believe the unfortunate consequences of this is that, if not changed, that when the data from this 2013 IEPR is used by other agencies in their planning efforts, a commendable step, that unfortunately those planning efforts will fall far short of the planning studies needed for the California Energy Supply to conform with ARB GHG Goals.

We did not find an opportunity to comment further during the numerous focused studies and workshops, because in this IEPR, unlike in 2012, Energy Storage was largely not studied directly, and the magnitude of the need for Zero Carbon Energy to expand over the next years has been far underestimated in this 2013 IEPR.

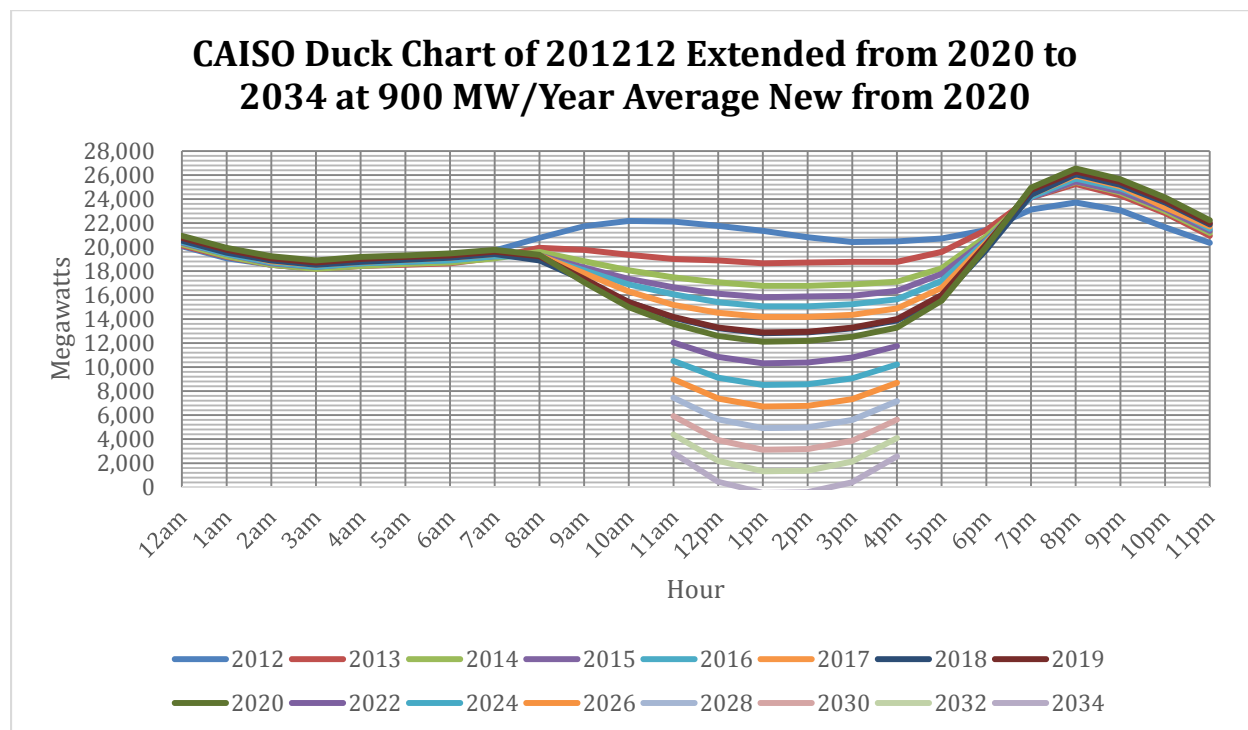
We note that the overall Electric Demand evaluated in Chapter 4 remains consistent with the Graphic we submitted on July 29th, but that the demand for Zero Carbon Electric Resources is not reflected in Chapter 9 on Climate Change, in fact is well underestimated. We include two graphics to point out the issues and refresh our comments, and hope that adjustments can be

made to the 2013 before it is finalized. We see an important need to either correct Chapter 9 in particular, or to note that there is additional information and data from the ARB 2020 thru 2050 Goals that needs to be further reflected in Planning Studies by the various regulatory agencies of the state.



We note that the information from the ARB 2020 thru 2050 Goals indicates a need for Zero Carbon Energy that is two to three times that shown in Chapter 9 of the 2013 IEPR.

Further, we note that the stated demand for Distributed Zero Carbon resources in Chapter 9 is likely to cause substantial transmission and distribution system chaos that can only be adequately addressed by the addition of substantial energy storage, in addition to the substantial and commendable efforts of CAISO to improve the capability of their grid to effectively integrate and balance such increases. We believe the below graphic represents reasonably closely the effect of the deployment of Distributed Resources as noted with out other resources being deployed in addition.



We are concerned that time is critical, and that Planning Studies need to be done near term to accommodate these issues.

Yours truly
Alton Energy, Inc.

Hal Romanowitz
CEO

