



August 19, 2014

Al Alvarado
California Energy Commission
1516 Ninth Street
Sacramento, CA 95819-5512
docket@energy.ca.gov

RE: 14-IEP-C – Integrating Environmental Information in Renewable Energy Planning Processes

Dear Mr. Alvarado:

The Large-Scale Solar Association (“LSA”) is comprised of leading owners and developers of utility-scale solar projects. LSA appreciates the opportunity to provide comments on the California Energy Commission’s (“CEC”) August 5th Workshop on Integrating Environmental Information into Renewable Energy Planning and was pleased to have the opportunity to participate in the workshop. Below we provide additional comments on the role of landscape-level planning and more general environmental information in the renewable energy planning processes.

The Role of Landscape-Level Planning

During the workshop, there was significant discuss on the potential benefits and role of landscape-level planning in general. We observe that in addition to meeting its conservation objectives, the Desert Renewable Energy Conservation Plan (“DRECP”) or other landscape-level planning efforts will, if properly calibrated (which we hope it will be), drive development to specific areas. The success of these efforts in supporting renewable energy development will depend on whether the following criteria are met:

- First and foremost, the landscape-level planning effort must provide incentives for industry to site within the zones, while in no way restricting development only to the zones or restricting development outside the zones (beyond lands not currently restricted by previous planning efforts – i.e. parks, mitigation areas, etc.). It must provide a framework for *assured and real* streamlined permitting within the designated renewable energy zones, while allowing for development outside the zones under business as usual permitting rules. In other words, development outside the zones within and outside the plan area should not be subject to higher permitting hurdles as a result of the planning exercise.
- It must designate adequate, well-suited acreage for renewable energy. It must plan for the future by establishing robust acreage for future renewable development.

- It must identify viable lands for the incentive zones - reasonable slope and insolation, reasonable land costs, proximity to transmission lines with available capacity, etc. in consultation with industry.
- If there are costs associated with streamlined permitting in the zones, those costs should provide real incentives to build in the zones, and not increase overall project costs. At the same time, costs to develop outside the zones should in no way be increased in the process.

Once the DRECP is adopted, and after developers have some experience with its process, industry will have a better sense of how and whether a Natural Community Conservation Planning/Habitat Conservation Plan (“NCCP/HCP”) approach for renewable energy should be applied elsewhere in the state. However, this is new and uncharted territory – the DRECP represents the first time a NCCP/HCP has been used for renewable energy planning. Until the Draft Plan is released and understood, it is difficult to speculate about the merits of the approach for renewables. Generally, as more robust environmental information is developed and aggregated for the DRECP and other landscape-level planning efforts, that information will be key for developers as they make decisions as to where to site projects. That, combined with streamlining benefits, should organically drive development to designated areas. Given the extensive environmental processes already in place in the state, assessing whether projects develop in designated zones and identifying barriers to that development (if any) is the most appropriate way to utilize this information in the energy planning processes.

The Role of Environmental Information in Renewable Energy Planning Processes

As noted during the workshop, LSA has concerns about the way environmental information has been used to date in the California Public Utility Commission’s (“CPUC”) Long-Term Procurement Plan process and the development of the Renewable Portfolios for the California Independent System Operator’s (“CAISO”) Transmission Planning Process. The current environmental screen favors areas where there is more information available even if that area may not in fact have fewer potential conflicts. This not only tips the scales against projects in other areas of the state but also results in a screen of questionable use for creating or comparing different portfolios. As we look forward to how screens can be improved and what environmental information may be appropriate for use in these in these energy-planning processes, LSA recommends that:

- Any use of environmental information in the energy planning process should provide a fair and reasonable metric for informing scenarios in a manner that treats all projects equally regardless of whether they are in an area that has undergone landscape-level planning. This should include using comparable level data-sets both within California and for locations outside California to enable a reasonable basis for comparison.
- The data and methodology should be transparent and accessible. All stakeholders need to have a clear understanding of how and why projects or zones will be evaluated in the process. The energy and transmission planning processes are already complex and difficult to navigate. LSA cautions against adding additional layers of screening unless they provide substantial benefit to the process. Here we are concerned for example, that the addition of a

screen for transmission projects would be difficult to assess and calibrate given the many possible routes for each transmission line and the time constraints in the annual transmission planning process. At a high level, it appears that this type of screen is unlikely to effectively aid the decision making process.¹

- The approach should recognize that incorporating environmental information into renewable energy planning comes with inherent uncertainty and data gaps and data quality issues. More attention and state- and federally-funded research efforts should be devoted to ensuring data quality and highlighting areas where there are data gaps.
- The use of environmental information in renewable energy planning should not pre-judge the environmental review processes of any projects.

LSA appreciates the opportunity to provide these comments and looks forward to continuing to work with the Energy Commission, CPUC and CAISO on these important issues.

Sincerely,



Rachel Gold
Policy Director
Large-scale Solar Association

¹ LSA understands that WECC has developed a framework for environmental screening in its transmission planning process and is in the process of evaluating that approach.