



California Energy Commission

DOCKETED

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TN # 74F

PUX 2014

November 17, 2014

Re: The *Desert Renewable Energy Conservation Plan*

To Whom It May Concern:

In-basin, Distributed Generation

I am writing to bring to your attention a deficit in the **Desert Renewable Energy Conservation Plan (DRECP)** that will ***require the development of an alternative that was not previously given sufficient consideration***. Specifically, the issue I wish to bring to your attention is distributed, in-basin generation, aka rooftop solar. In the DRECP this “alternative” was placed in a category called “Alternatives Considered but not brought forward for Detailed Analysis.” The rationale given for not performing a detailed analysis was because this alternative would not lead to the “development of a streamlined process for the development of utility-scale renewable energy.” (Vol. II, Section 8, Page 9) This rationale for not performing a detailed analysis of distributed, in-basin solar has the effect that any alternative method of creating 20,000 megawatts of generating capacity that does not meet the a priori criteria of utility-scale facilities is not seriously considered, *even if it is economically viable and environmentally superior*.

The rationale described above for not carrying forward rooftop solar for a detailed analysis is an example of a ***flawed analysis*** that pre-ordains conclusions. The ***flawed analysis*** used in this section of the DRECP means that any alternative that does not lead to a predetermined outcome—utility-scale generating facilities—cannot be given serious consideration. The correct analysis of each and every alternative, including rooftop solar, should be on the basis of cost, technical feasibility, generating potential, and environmental impacts.

In the five years since the commencement of the DRECP process, rooftop solar has seen costs decrease and efficiencies increase. A report published by UCLA’s Luskin Center in July 2014 (<http://innovation.luskin.ucla.edu/content/profile-clean-energy-investment-potential>) estimates over 19,000 megawatts of rooftop generating capacity in LA County alone. **This study provides new information that demands a detailed analysis of rooftop solar as an alternative to the utility-scale generating facilities proposed in the draft DRECP.**



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Integrity of Public Process

The DRECP is estimated to be 8000 pages in length. The idea that there could be meaningful public input on a document of such complexity in 90 days defies credulity and casts serious doubt on the integrity of the public process. A report that took 5 years to create cannot be reviewed by the public in 90 days. Given the exceptional detail and complexity of the DRECP, I ask that the public comment period be extended to a total of 360 days.

The public hearing in San Diego occurred less than 30 days after the publication of the DRECP. I ask that there be another round of public hearings to begin 270 days after the publication of the DRECP, and that San Diego be included in that second round.

Although a mere 268,000 acres of the land affected by the DRECP is in San Diego County, all of those acres are at the eastern edge of San Diego County. The only town of any size in San Diego County that is covered by the Plan is Borrego Springs, CA. If the public process is to have integrity, it must include those people who are most directly impacted by the Plan. Consequently, I ask that a public hearing be held in Borrego Springs, California during the second round of public hearings, between 270 and 360 days after the publication of the DRECP.

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