

Energy - Docket Optical System

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Sent: Tuesday, December 02, 2014 7:40 AM
To: Energy - Docket Optical System
Subject: DRECP NEPA/CEQA

California Energy Commission

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To Whom It May Concern:

In-basin, Distributed Generation

I am writing to bring to your attention issues that will require the development of an alternative that was not previously given serious 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 rooftop solar means 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 really an alternative.

The rationale described above for not carrying forward rooftop solar for a detailed analysis is an example of a flawed analysis that substantially changes 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%2

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