



December 8, 2014

California Energy Commission  
Dockets Office, MS-4  
Re: Docket No. 14-IEP-1  
1516 Ninth Street  
Sacramento, CA 95814-5512

California Energy Commission

**DOCKETED**

**14-IEP-01**

**TN 74119**

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Delivered via email to: [docket@energy.ca.gov](mailto:docket@energy.ca.gov) and  
[Stephanie.Bailey@energy.ca.gov](mailto:Stephanie.Bailey@energy.ca.gov)

RE: Docket No. 14-IEP-1  
2014 Draft Integrated Energy Policy Report Update

Dear Commissioners:

Thank you for the opportunity to comment on the 2014 Draft Integrated Energy Policy Report Update (2014 Draft IPER Update). These comments are submitted on behalf of Defenders of Wildlife (Defenders) and our more than one million members and supporters in the United States, 200,000 of which reside in California.

Defenders participated in the August 5<sup>th</sup> Lead Commissioner Workshop on Integrating Environmental Information in Renewable Energy Planning Processes and submitted written comments individually and jointly in collaboration with The Nature Conservancy, Natural Resources Defense Council, and Sierra Club (Joint Conservation Parties). We reiterate our comments from August and appreciate the opportunity to participate in the IEP process.

We support the CEC, California Public Utilities Commission (CPUC) and California Independent System Operator (CAISO) incorporating environmental information into their decision-making processes. We also support making project and transmission decisions based upon environmental information and consistent with planning efforts such as the Desert Renewable Energy Conservation Plan (DRECP) and new planning efforts elsewhere in California.

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We have reviewed the 2014 Draft IPER Update and are pleased to see a focus and commitment on integrating environmental information in the renewable energy planning process. Looking forward to a greater integration of renewables in California's energy portfolio, we are encouraged by and supportive of the Commission's stance on page 166 of the 2014 Draft IEPR.

*"Moving forward, California needs to build on best practices to help ensure that efforts to advance renewable energy development are made thoughtfully and with careful stewardship of the state's natural resources."*

And on page 186 of the 2014 Draft IEPR:

*"The Energy Commission is committed to working with other agencies, permitting jurisdictions and stakeholders to advance renewable generation and transmission planning processes. The goal for these actions is to compile and share relevant landscape-scale environmental information, promote transparency in the resource planning processes and encourage energy infrastructure development in a manner that ensures system reliability while safeguarding California's sensitive environmental resources."*

The Commission's draft recommendations to:

- *Finalize and implement DRECP.*
- *Collaborate and improve agency energy infrastructure planning processes.*
- *Advance the current capabilities of the state in performing landscape scale analysis.*
- *Evaluate how to best apply landscape considerations in statewide transmission plans.*

These recommendations are valuable steps to achieve the Commission's objective to "...to advance renewable energy development are made thoughtfully and with careful stewardship of the state's natural resources."

Continued focus and prioritization of landscape-scale renewable energy planning<sup>1</sup> is needed to make that objective a reality. This approach was recommended in the 2012 IEPR (p. 53) and we continue to support that strategy. Equally important is close, transparent coordination between the energy agencies and resource agencies to facilitate collaborative, open, and effective planning for "smart from the start" energy planning and development.

We continue to recommend<sup>2</sup> that landscape-scale planning for energy should inform and influence energy generation and transmission planning. Landscape-scale planning should

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<sup>1</sup> Comments from the August 5, 2014, Integrated Energy Policy Report workshop, [http://www.energy.ca.gov/2014\\_energy\\_policy/documents/2014-08-05\\_workshop/comments/Defenders\\_of\\_Wildlife\\_S\\_Dashiell\\_Comments\\_to\\_Lead\\_Commissioner\\_Workshop\\_Landscape\\_planning\\_2014-08-19\\_TN-73679.pdf](http://www.energy.ca.gov/2014_energy_policy/documents/2014-08-05_workshop/comments/Defenders_of_Wildlife_S_Dashiell_Comments_to_Lead_Commissioner_Workshop_Landscape_planning_2014-08-19_TN-73679.pdf)

<sup>2</sup> Comments from the August 5, 2014, Integrated Energy Policy Report workshop, [http://energy.ca.gov/2014\\_energy\\_policy/documents/2014-08-05\\_workshop/comments/Joint\\_Conservation\\_Parties\\_Comments\\_August\\_5\\_Workshop\\_2014-08-19\\_TN-73684.pdf](http://energy.ca.gov/2014_energy_policy/documents/2014-08-05_workshop/comments/Joint_Conservation_Parties_Comments_August_5_Workshop_2014-08-19_TN-73684.pdf), page 2.

inform future locations of renewable energy projects and only then transmission be planned to serve and incentivize those “smart from the start” development areas.

### **Conclusion**

For California to responsibly meet its GHG emission targets and continue to decarbonize the energy sector without unnecessarily sacrificing its remaining pristine lands and valuable habitat for plants and animals, it is essential that environmental information be integrated into renewable energy planning in an effective manner.

Thank you once again for the opportunity to provide comments on the 2014 Draft IEPR Update and for considering our comments. If you have any questions, please contact me at (530) 902-1615 or via email at [kate@kgconsulting.net](mailto:kate@kgconsulting.net).

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Kate Kelly', with a stylized flourish at the end.

Kate Kelly  
Energy and Land Use Consultant  
Defenders of Wildlife