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1. Introduction and Summary

The Nature Conservancy (“Conservancy”) appreciates the opportunity to submit comments in response to the California Energy Commission’s draft 2014 Integrated Energy Policy Report Update (“draft IEPR”).

The mission of the Conservancy is to conserve the lands and waters on which all life depends. To achieve that mission, the Conservancy strongly supports the emission reduction goals¹ and renewable energy mandates² established by the state of California to benefit Earth’s climate. The Conservancy is an active proponent of policies that will advance California’s transition to a low carbon energy future, in a manner that protects biodiversity, important habitats, and water, for people and nature. The Conservancy supports a multi-pronged approach that prioritizes energy efficiency and demand response, deployment of distributed renewable energy generation in areas of least impact (e.g., rooftops and parking lots), and utility-scale renewable energy development that is guided by comprehensive planning. Comprehensive planning for renewable energy – inclusive of environmental information and landscape-scale ecological planning – is critical to developing successful and sustainable solutions to further decarbonization of the electricity sector in the post-2020 timeframe.

For these reasons, the Conservancy appreciates that the Commission has taken a leadership role in convening a dialogue around integrating environmental information into renewable energy planning processes. The Conservancy is supportive of several of the recommendations contained within Chapter 8 (“Integrating Environmental Information in Renewable Energy Planning Processes”) of the draft IEPR, as discussed further below.

¹ Global Warming Solutions Act of 2006 (AB 32).

² California’s 33 Percent by 2020 Renewables Portfolio Standard.

2. DRECP

The Nature Conservancy has been a stakeholder to the DRECP for a number of years and we are committed to using our on-the-ground experience and our scientific expertise to strengthen the DRECP conservation planning process.

We remain firmly committed to landscape-scale planning for renewable energy and conservation in California. Landscape-scale planning allows for implementation of the mitigation hierarchy, which is the greatest opportunity for avoiding the adverse impacts of energy. Incorporating the mitigation hierarchy into the energy planning, ensures that: 1) facilities are first sited to *avoid* impacting natural systems; 2) technology choices, facility operating protocols and modifications to project footprint are made to further *minimize* impacts; 3) *restoration* of impacts occurs when technically feasible, and 4) effective off-site conservation measures are undertaken to *mitigate* for (or offset) remaining impacts.

The DRECP is at a critical stage in the planning process and we are committed to continuing to provide our expertise in working towards the goal of successful completion. The Nature Conservancy is presently working on scientific analyses and science-based policy recommendations, in response to the Draft DRECP EIR/EIS, with the intent improving the DRECP's approach to a number of key issues, including durability, biological goals and objectives, protection of groundwater and groundwater dependent resources, and refining the development focus areas.

3. Agency Collaboration to Improve Energy Planning Processes

We appreciate the increased coordination between the Energy Commission, the California Public Utilities Commission (PUC) and the California Independent System Operator (CAISO) on energy infrastructure planning processes, and we strongly encourage this to continue. We support the goal of this collaboration, as articulated in the draft IEPR:

“The agencies are committed to continuing to collaborate and align their electricity infrastructure planning processes with a primary goal being to ensure that California’s energy and environmental policy goals are met in a coordinated, transparent, and effective manner.”³

To strengthen the outcome of this collaboration and alignment, there should be a clear articulation of the environmental policy goals that the agencies seek to achieve. The agencies should affirm that ecological conservation goals are included under the umbrella of “environmental policy goals”. Based on our experience, ecological conservation goals

³ California Energy Commission. 2014. *2014 Draft Integrated Energy Policy Report Update*. Publication Number: CEC-100-2014-001-D. Pg. 175.

have been historically underrepresented in the energy policy context and must be incorporated moving forward.

The Nature Conservancy supports the collaboration recommendation, as outlined in the draft IEPR:

“Collaborate and improve agency energy infrastructure planning processes. The Energy Commission and the CPUC should use their experiences from recent planning efforts, including the DRECP, the CPUC LTPP and the California ISO TPP processes, to shape the current process at hand and improve the overall consistency of future energy planning efforts.”⁴

The Nature Conservancy, together with NRDC, Sierra Club, and Defenders of Wildlife, recently submitted comments to the PUC in response to the Energy Division Proposal on the Renewables Portfolio Standard (RPS) Calculator. The RPS Calculator reform is a key opportunity to shape and improve an important tool used in long-term energy and transmission planning. As stated in joint comments to the PUC, it is important that the RPS Calculator continue to have an environmental methodology – and that the previous methodology is improved – to reflect experiences from, and advancements in, landscape-scale planning for ecological conservation and renewable energy.

The RPS Calculator is an important tool that can inform policy discussions, but a multi-agency and stakeholder dialogue is needed to consider multiple values when making transmission investment decisions.

4. Landscape Considerations in Transmission Planning

The Nature Conservancy supports the transmission planning recommendation, as outlined in the draft IEPR:

“Evaluate how to best apply landscape considerations in statewide transmission plans. The Energy Commission should lead an effort to bring stakeholders together and further explore how DRECP and other landscape level analysis can be incorporated into the 2015 Strategic Transmission Investment plan.”⁵

The 2015 Strategic Transmission Investment Plan is a timely opportunity to convene agencies and stakeholders to explore how DRECP and other landscape-level analyses can be applied in statewide transmission plans. This kind of convening can leverage the

⁴ California Energy Commission. 2014. *2014 Draft Integrated Energy Policy Report Update*. Publication Number: CEC-100-2014-001-D. Pg. 187.

⁵ California Energy Commission. 2014. *2014 Draft Integrated Energy Policy Report Update*. Publication Number: CEC-100-2014-001-D. Pg. 187.

knowledge and resources that will be needed to arrive at solutions that protect wildlife and natural resources, are consistent with landscape-scale planning, and ensure that renewable resources, and associated transmission, are selected in a manner that is cost-efficient while ensuring system reliability and reducing carbon.

5. Conclusion

We appreciate that the Commission chose to include integrating environmental information into renewable energy planning processes, in the 2014 IEPR update. The Nature Conservancy appreciates the opportunity to have participated in the workshop that explored this issue area, and the opportunity to follow-up to the workshop and draft IEPR with written comments. We strongly support continued dialogue on this topic in 2015. If you have any questions, please contact me at (415) 281-0451 or via email at ebrand@tnc.org.

Respectfully submitted,

A handwritten signature in cursive script that reads "Erica Brand".

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