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Defenders of Wildlife Comments on 2022 IEPR Scope - Docket 22-IEPR-01

Additional submitted attachment is included below.



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March 22, 2022

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 22-IEPR -01
1516 Ninth Street
Sacramento, CA 95814-5512

Delivered via email to: docket@energy.ca.gov

RE: Docket No. 22-IEPR-01 — 2022 Scoping Order
Comments on the Scope for the 2022 Integrated Energy Policy Report

Defenders of Wildlife (Defenders) respectfully submits these comments on the scope for the 2022 Integrated Energy Policy Report (2022 IEPR). Defenders, on behalf of our 323,000 members and supporters in California, works towards the protection of wildlife, ecosystems, and landscapes while supporting the timely development of renewable energy resources in California. Achieving a low carbon energy future is critical for California – for our economy, our communities, and the environment. Achieving this future—and *how* we achieve it—is critical for protecting California’s internationally treasured wildlife, landscapes, productive farmlands, and diverse habitats.

We appreciate the Commission and staff’s efforts in developing the 2022 IEPR Scope and, in particular, the creation of a California Planning Library. Currently, energy and transmission planning is hampered by a lack of a centralized, transparent data repository that includes data sets used for IEPR, busbar mapping, SB 100 implementation, California Independent System Operator (CAISO) 20 Year Outlook, Executive Order N-82-20 (30 x 30), water resources, and California Natural Resources Agency (CNRA), CalEPA and wildfire data sets. The data sets need to be readily available so agencies and stakeholders can actively engage and issue spot for potential renewables, storage, and transmission projects. A centralized planning library and

mapping tool will allow uniform mapping analysis and enable agencies and stakeholders to identify salient data gaps.

The California Planning Library must include land use and environmental data sets to enable consideration of land use implications in the development of lands for renewable energy generation and transmission. It is state policy “that the protection and management of natural and working lands is an important strategy in meeting the state’s greenhouse gas emissions reduction goals.”¹ (emphasis added). The inclusion of land use and environmental data sets is essential for the analysis needed to concurrently meet California’s goals under both SB 100 and 30 x 30.

The California Planning Library should include a robust and transparent mapping platform that is user-friendly. Similar to the California Statewide Energy Gateway² and Offshore Wind Energy Gateway³ on Data Basin, the mapping platform should provide prebuilt maps and allow users to build maps to analyze energy planning and development. The tool should include live data tables and users should be able to click on maps to view the underlying metadata.

The data and mapping tools in the California Planning Library should be organized to allow analysis by not just transmission zones but should allow for analysis based on ecoregions and geopolitical boundaries (e.g., counties and councils of government). Mapping for energy planning at geopolitical and ecoregional levels will enable integration of energy planning into local and regional planning including general plans⁴ and conservation planning. Such integration is essential to plan for California’s future that balances clean energy development with natural and working lands protection.

The data and mapping tools should also include real-time generation, storage, and transmission project permitting (aka land use entitlement) information that would include project location and land use and environmental permitting status. Permitting data will provide much needed insights on what, where, and when actual generation, storage, and transmission can be expected. While the interconnection queues offer a snapshot of energy development interest, it does not accurately capture potential development. A considerable number of interconnection requests are withdrawn each year. For example, 152 interconnection requests completed a Phase I and/or II study in the CAISO process and 97 interconnection requests were withdrawn in 2020.⁵ A project in an interconnection queue that lacks permits from land use

¹ CA Public Resources Code Section 9001.5(a)

² <https://caenergy.databasin.org/>

³ <https://caoffshorewind.databasin.org/>

⁴ <https://opr.ca.gov/planning/general-plan/>

⁵ http://www.caiso.com/Documents/FERC845_InterconnectionStudyStatistics.pdf

authority is aspirational at best.

Because energy planning is land use planning, we recommend that the Governor's Office of Planning and Research (OPR) and CNRA be included in the team developing the California Planning Library. OPR and CNRA will bring beneficial and necessary land use and conservation planning input to advance California's energy planning in a sustainable and environmentally responsible manner.

Conclusion

Thank you for the opportunity to provide initial comments on the scope for the 2022 IPER. We look forward to actively participating in the development of the 2022 IEPR and California Planning Library. Please contact Pamela Flick at (916) 442-5746 or pflick@defenders.org or Kate Kelly at (530) 902-1615 or kate@kgconsulting.net with any questions.

Sincerely,



Pamela Flick
California Program Director



Kate Kelly
Consultant