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California Energy Commission
Dockets Office, MS-4
Re: Docket No. 09-IEP-1A
1516 Ninth Street
Sacramento, CA 95814-5512

Public comment by Frank Brandt of San Jose, CA
Docket No. 09-IEP-1A
CEC 2009 *Integrated Energy Policy Report* ~~draft~~

Someday a historian will write a book entitled , "The Decline and Fall of the State of California." It will have a chapter about the inability of the state government to manage its finances. There will be a chapter about the state government's inability to manage its energy resources. This raises the question of why the state feels the need to manage energy especially when it apparently does not have the necessary skill.

I stand by my public comments to the IEP draft dated 10/31/09 which were published by the CEC. The CEC chose to ignore these and other comments and the final draft remains as flawed advice to the various state government agencies.

There are some jewels buried in the verbiage of the report but they are swamped by the flawed advice. Here are quotes from the document. Equate these to the CEC response to them.

From the preface

"and provides policy recommendations to conserve resources; protect the environment; ensure reliable, secure, and diverse energy supplies; enhance the state's economy; and protect public health and safety (Public Resources Code § 25301[a]). This report fulfills the requirement of SB 1389."
and

"The information gained from workshops and stakeholders along with Energy Commission staff analysis was used to develop the recommendations in this report."

From the abstract

"The Committee Final 2009 *Integrated Energy Policy Report* evaluates overall supply and demand trends for electricity, natural gas, and transportation fuels in California, as well as issues associated with energy infrastructure, efficiency, reliability, and cost. The report describes the various energy policies significantly affecting California's energy sectors and outstanding issues that will need to be addressed in each sector to maintain reliable, affordable, and environmentally benign sources of energy for the state's citizens. The report focuses on issues surrounding the integration of increased levels of renewable energy in both the electricity and transportation fuel sectors and makes recommendations on future actions the state should pursue. "

From the executive summary

"the driving force for the state's energy policies continues to be maintaining a reliable, efficient, and affordable energy system that minimizes the environmental impacts of energy production and use "

From the paragraph on RENEWABLE ENERGY

“Challenges with increasing the amount of renewable resources in California’s electricity mix are plentiful. They include the difficulty of integrating large amounts of renewable energy into the electricity system; uncertainty on the timeline for meeting RPS goals; environmental concerns with the development of renewable facilities and associated transmission; difficulty in securing project financing; delays and duplication in siting processes; time and expense of new transmission development; the cost of renewable energy in a fluctuating energy market; and maintaining the state’s existing baseline of renewable facilities “

And

“Not all renewable generators provide the operating characteristics that the system needs to maintain local area reliability, and integrating certain renewable technologies can make it more difficult to operate the system reliably. While geothermal and biomass resources can provide baseload power, resources like wind, hydro, and solar are intermittent and not always available to meet system needs during peak hours. Intermittent resources can also drop off or pick up suddenly, requiring quick action by system operators to compensate for the sudden changes. Significant energy storage will be required to integrate future levels of renewables, thus allowing better matching of renewable generation with electricity needs. These technologies can also reduce the number of natural gas-fired power plants that would otherwise be needed to provide the characteristics the system needs to operate reliably. However, many storage technologies are still in the research and development stage, are relatively expensive, and need further refinement and demonstration.”

From Achieving Energy Goals

“California needs reliable, affordable, and clean supplies of energy to serve its citizens and maintain a strong economy. “

Brandt comment

How does the CEC policy document respond to the request for reliable energy? It promotes the legislative demand for unreliable energy sources and ignores the only energy source which can provide reliable energy with no greenhouse gas production, nuclear. It then goes on to methods to remove the existing nuclear plants! What kind of policy is this which ignores the stated instructions from the legislature that it doesn’t want but then touts the legislature’s recommended but flawed energy sources?

The new words added to the draft do not help a fundamentally flawed document. I suggest another reading of my comments to the draft edition.

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