



California Energy Commission

DOCKETED

14-IEP-1C

TN 74115

DEC 04 2014

SUBJECT:

In the matter of,

*2014 Integrated Energy Policy Report Update
(2014 IEPR Update)*

CEC Docket No. 14-IEP-1C

CEERT Comments on
the Draft 2014 IEPR Update
December 4, 2014

TO: California Energy Commission: docket@energy.ca.gov
CEC Docket 14-IEP-1C

CC: Mike Jaske: Mike.Jaske@energy.ca.gov

FROM: V. John White (vjw@ceert.org)
Executive Director
Center for Energy Efficiency and Renewable Technologies (“CEERT”)

Introduction:

The Center for Energy Efficiency and Renewable Technologies (CEERT) appreciates the opportunity to provide these comments regarding the California Energy Commission’s 2014 Update to the Integrated Energy Policy Report (IEPR).

Renewable Energy Planning Processes:

The 2014 Integrated Energy Policy Report Update includes a section on the Environmental Information in the Renewable Energy Planning Process. CEERT supports the proposed recommendation to finalize and implement the Desert Renewable Energy Conservation Plan, advance the state's capabilities in performing landscape scale analysis, and continue to improve renewable energy and transmission planning, coordination, consistency and transparency.

We strongly support the recommendation for the CEC to work with the California Public Utilities Commission and the California Independent System Operator to build and improve upon recent renewable energy and transmission planning processes in order to improve coordination in California, particularly in the post-2020 timeframe. We support the CEC’s efforts to bring stakeholders together to explore how landscape level analysis can be incorporated into the 2015 Strategic Transmission Investment Plan.

CEERT also supports the recommendation for the exploration of potential partnerships beyond California, which include the western United States and the western interconnected grid.

We are pleased that the Update discusses the potential problems of including an environmental screening system in the CPUC Long Term Procurement Plan, but does not recommend the implementation of environmental screens in this context. Alternatively, we look forward to seeing how agencies and stakeholders can better take advantage of the Conservation Biology Institute's Data Basin platform, which provides potentially valuable tools in transmission and landscape level planning.

Beyond 2020

This IEPR Update recognizes the need to move beyond the interpretation that 33% RPS is a floor and not a ceiling and set a greenhouse gas standard for 2030 and 2050. Implementing these policies would ensure that California remains a world leader in greenhouse gas reduction programs and renewable energy development. We hope that the 2015 IEPR will provide a platform for the development of an update to the energy section of the AB 32 Scoping Plan.

CEERT looks forward to continuing to work with the Commission as it implements these recommendations and moves forward in setting a path for low-carbon energy beyond 2020.