



Center for Energy Efficiency and
Renewable Technologies
1100 11th Street
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California Energy Commission

DOCKETED
12-EPIC-01

TN # 67469

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October 1, 2012

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 12-EPIC-01
1516 Ninth Street
Sacramento, CA 95814-5512

Re: Electric Program Investment Charge (EPIC) Comments on the proposed 2012-14 Triennial Investment Plan

Dear Pam Doughman and Erik Stokes,

The Center for Energy Efficiency and Renewable Technologies (CEERT) appreciates the opportunity to provide comments on the Energy Commission's EPIC Triennial Investment Plan. CEERT fully supports the proposed Applied Research and Development investment area Strategic Objective 5.2 and Market Facilitation subcategories of Strategic Objective 14.

CEERT suggests that the CEC and CPUC widen the funding parameters under the Applied Research and Development Strategic Objective to cover a wider range of topics; specifically, species and habitat issues that could impede permitting.

Right now, the renewable energy industry faces additional resistance and barriers to siting projects which is counterproductive as California looks to meet AB 32 goals and move to clean energy and away from fossil fuels.

CEERT believes the EPIC program should prioritize to the extent possible research that addresses species barriers and any barrier to permitting in the way of otherwise feasible renewable energy projects. Although this topic is addressed in S5.2 which states that one such barrier is from the lack of research on some critical species. For example, impacts of Golden Eagles and Mojave Ground Squirrels are relatively unstudied, which is a barrier to development. CEERT would like to ensure that EPIC prioritizes funding

for studies that will address these barriers to permitting and therefore facilitate renewable energy projects while minimizing impacts on protected species.

Additionally, like mitigation, species research has traditionally been done project by project. CEERT suggests as the state moves to a new regional approach to mitigation, which the DRECP represents, the state should also move to more integrated research community. Agencies and developers could benefit from improved efficiency by creating a wider approach to research that can address the species and implementation issues at the proper scale both spatially and temporally now that we are planning for renewables over ecoregions and for 30-40 year time frames.

This regional approach to research should also cover implementation by the local governance. The CEC EPIC currently has grant money available for counties and cities to add a renewable energy component to their general plan this category should be prioritized and fully funded to ensure that preventable barriers to development do not impede the adoption of renewable energy.

Government Funding tends to focus on technology-based research, but as California moves to integrate more renewable and addresses new challenges to development of additional renewable energy, we feel it is appropriate to use EPIC funds on broader range of species, ecosystem, and planning issues that will arise as we move to a clean energy future.

If you have any questions or need additional information please contact Anne Baker or Ryan Drobek.

Thank you,

A handwritten signature in black ink, appearing to read "V. John White". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

V. John White,
Executive Director,
Center for Energy Efficiency and Renewable Technologies