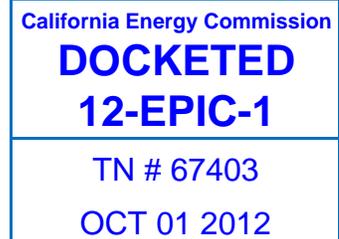




California Wind Energy Association



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: Comments on the California Energy Commission's Proposed 2012-14 Triennial Investment Plan

Dear Commission:

The California Wind Energy Association ("CalWEA") appreciates the opportunity to provide comments on the Energy Commission's Proposed 2012-14 Triennial Investment Plan ("draft Plan") for the Electric Program Investment Charge ("EPIC"). CalWEA wishes to express its strong support for the proposed Applied Research and Development investment area, and in particular for Strategic Objective 5, item 2 ("S5.2"). We also have one modest comment in this area of the draft document.

We are very pleased to see that the draft Plan addresses siting-related environmental research related to renewable energy. Addressing research in this area fits squarely within the legislative authority for the EPIC program, as it addresses siting and ecology issues of statewide importance. CalWEA can confirm and underscore, as stated on page 15 of the draft Plan, that "a significant challenge in developing renewable energy projects is often the lack of data necessary to complete environmental permitting requirements." CalWEA would rank this challenge as at least equal to any of the other research needs related to renewable energy identified in the plan.

The lack of information on sensitive species and habitats is a very significant obstacle to the timely permitting of wind and solar energy projects. As we set forth in more detail in our August 24, 2012, comments, the research agenda for one key species alone, the golden eagle, would require at least several million dollars to address. Therefore, we appreciate the emphasis in funding for the applied research topic area, because there will be many demands on the S5.2 subtopic alone.

These research issues are generally so broad that it is not reasonable to expect developers to fund them as part of their project proposals. An example is estimating California's golden eagle population, which goes well beyond the study requirements under CEQA, but which is integrally related to project permitting. Meanwhile, state and federal wildlife agency budgets are currently

so stretched that they also cannot be expected to devote resources to fill these important information gaps. Therefore, the draft Plan's Item S5.2, which addresses research on sensitive species and habitats, is critically needed to provide funds to inform renewable energy siting and permitting processes.

We have one suggested modification in the draft Plan regarding Table 6, which summarizes ratepayer benefits for Strategic Objective 5. With regard to the row addressing item S5.2, research on sensitive species and habitats, the columns are checked under "increased safety" and "societal benefits". We would urge you to also check the columns for "lower costs" and "economic development." As further elaborated in our August 24 comments, research in this area will reduce California's high permitting costs, which are ultimately passed on to ratepayers in the form of higher energy costs. Ratepayers will also benefit from increased competition for available power purchase contracts, leading to lower energy prices. Both of these things will increase the ability of California to rely on renewable energy generated within the state, thus promoting economic development.

CalWEA appreciates this opportunity to comment on this important research initiative.

Sincerely,

A handwritten signature in black ink that reads "Nancy Rader". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Nancy Rader
Executive Director

cc: Pamela Doughman (by email: Pamela.doughman@energy.ca.gov)
Erik Stokes (by email: erik.stokes@energy.ca.gov)