



Center for Energy Efficiency and
Renewable Technologies
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June 5, 2011

California Energy Commission
Dockets Unit, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

RE: Docket No. 09-Renew EO-0 1
Center for Energy Efficiency and Renewable Technologies'
Comments on the DRECP Framework Conservation Strategy

Dear Madam/Sir,

We would like to thank the Renewable Energy Action Team (REAT) for this opportunity to comment on the conservation framework. We appreciate the work that has brought the plan to this point, but are disappointed that it has yet to address a comprehensive plan for the development of renewable energy. To do so, we suggest the Desert Renewable Energy Conservation Plan (DRECP) address the following:

1. Development Plan Proposal – The DRECP's goal to develop renewable energy in the California Desert should be reflected in the work products and timeline of the DRECP. Therefore, we suggest the addition of a separate development plan, which parallels the conservation plan's track and timeline. Within the development plan we suggest the following items be produced or re-analyzed.
 - a. Gap Analysis
 - b. Disturbance Analysis
 - c. High/Low Development Potential Map
 - d. Development Principles
2. Integration of the conservation and development plans – once the two tracks are created they will need to be integrated. This critical discussion needs to begin and we need to understand how this will happen, so all non-agency stakeholders can begin to see how the plan will function.

3. Phased approach to the DRECP - Rather than having areas with high value for development be prematurely taken out of discussion, we suggest that some areas receive a more in-depth analysis based on value for both conservation and development, allowing low conflict areas to be set aside quickly. CEERT believes it is most important to develop smaller areas where success can be demonstrated for siting facilities and resolving species issues, while not impeding future discussion.

4. Acreage Calculator –CEERT believes 60 - 66% renewable energy by 2030 is the future goal, which approximates California's long term climate and clean energy targets. Regardless of which long-term renewable goal is included, the acreage cap on development should be expansive enough to ensure it does not unnecessarily restrict the solar or wind development of the future.

Thank you for your consideration,

John White

Executive Director