

Energy - Docket Optical System

From: Don Wood <dwood8@cox.net>
Sent: Friday, December 19, 2014 4:45 PM
To: Energy - Docket Optical System
Subject: Pacific Energy Policy Center comments on DRECP NEPA/CEQA draft EIR

Pacific Energy Policy Center



December 19, 2014

To: California Energy Commission members and staff

From: Don Wood

Subject: Pacific Energy Policy Center initial comments on Draft Desert Renewable Energy Conservation Plan (DRECP) and Environmental Impact Report/Environmental Impact Statement (EIR/EIS)

The Pacific Energy Policy Center is a small, Pro Bono energy policy group led by retired policy analysts who have worked for California's energy policy regulatory agencies and the state's major electric utilities. We do not typically participate in CPUC and CEC proceedings, but occasionally comment on issues we believe will have a major impact on California's energy future. We have scanned and discussed the DDRECP and EIR/EIS, and have four major areas of concern.

1. This proposal completely ignores the very real potential for generating enormous amounts of "new" renewable electricity by placing solar photovoltaic panels on urban rooftops and over acres of parking lots in urban core areas, which would eliminate the need for hundreds of miles of new transmission lines, since those panels are closer to urban core high energy demand areas. Rooftop solar technology has progressed significantly during the five years since the Plan was initiated. Given these advances, local rooftop solar should be brought forward for a far more detailed analysis of its technological and economic merits, rather than being dismissed because it is not within the proposals narrowly focused goal of developing more utility-scale electric production in the desert. We recommend that the projects goals be reviewed to see if a broader goal

would achieve the same amount of new renewable energy coming into the grid, without the massive environmental disruption and damage required to site giant new utility scale projects out in the remote desert. We believe that a full review of the potential costs and benefits of installing more solar rooftop distributed generation systems should be treated as a viable and perhaps even a preferred alternative in this EIR/EIS process.

2. A document of this length (8000 pages) and complexity cannot be adequately reviewed and evaluated by the public within the standard 90-day timeframe. This is an extraordinarily complex document that demands an extended period for public review—360 days—if the public process is to remain credible and not just a pro forma charade with a foregone conclusion.
3. There were 10 public hearings scheduled between October 20th, 2014 and November 13th, 2014. San Diego county's hearing occurred on October 21st, less than 30 days after the publication of the 8000-page document. There should be another round of public hearings beginning 180 days after the publication of the Plan, i.e. the end of March 2015. This would give affected communities throughout the state time to digest and evaluate what the Plan means for them.
4. Borrego Springs, California is the largest community, and only community of any size, in San Diego County that is actually within the boundaries of the Plan.

Yet the Commission has not scheduled any hearings there. The Commission should notice and hold a public hearing in Borrego Springs.

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