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California Energy Commission

DOCKETED

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Karen Douglas
Commissioner
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Charlton H. Bonham
Director
California Department of Fish and Game
1416 Ninth Street
Sacramento, CA 95814

James G. Kenna
State Director, California State Office
Bureau of Land Management
2800 Cottage Way
Sacramento, CA 95825

Ren Lohofener
Regional Director, Region 8
U.S. Fish and Wildlife Service
2800 Cottage Way
Sacramento, CA 95825

Re: Renewable Energy Conservation Plan and Draft Statement/Environmental Impact Report, California,

Dear Commissioner Douglas, Director Bonham, Director Kenna, and Director Lohofener:

The current DRECP draft alternatives all represent out dated, 6 year old thinking and technology. The renewable energy industry leaders are headed away from utility scale RE on large undisturbed tracks of land. To illustrate, below is a quote from NRG Energy's CEO, David Crane in his letter to his shareholders in March of 2014. (NRG Energy is a significant partner in the huge **Ivanpah Solar** Electric Generating System.)

Quote:

"Just a few years ago the prevailing wisdom was that the path to a clean energy economy depended on our collective willingness to build a nationwide, high voltage transmission system in order to transport electricity in vast quantities from the relentlessly windy and brutally sunny parts of the country, where people generally don't live, to the more moderate places where Americans tend to congregate. The folly of that idea thankfully was realized before anyone actually began to build such an expensive and pointless white elephant. Now we are headed for the same goal BUT in the opposite direction: down the path towards a distributed generation-centric, clean energy future featuring individual choice and the empowerment of the American energy consumer."

End of Quote

In light of technology advances and new industry thinking the following issues should be considered in the final DRECP:

- 1) The discarded DRECP Distributed Generation Alternative should be revisited and elements of it should be brought forward into the current preferred alternative to shrink DFAs.
- 2) Areas of disturbed lands all over the State close to existing transmission and substations should be identified to expand the geographical opportunities for utility scale RE that will contribute to the DRECP's total mega-watt computations.
- 3) DFAs should be re-defined to avoid critical wildlife linkages and ecological issues that have been identified by other commenters.

I respectfully submit these comments.



Ruth Rieman