

Sierra Club  
801 K Street, Suite 2700  
Sacramento CA 95814

June 15, 2012

Commissioner Karen Douglas, California Energy Commission  
Desert Renewable Energy Conservation Plan (DRECP) Director David Harlow  
Via email

Dear Commissioner Douglas and Director Harlow:

Thank you again for reviewing Sierra Club's recommendations on inputs to the Acreage Calculator for the DRECP, including suggested technical corrections, recommendations based on state policies, and other considerations. We very much appreciate the opportunity we had to discuss the issues with you and your staff at the recent Stakeholder Meeting, as well as your willingness to rethink some of the previous inputs.

The conservation needs for covered species and natural communities, including ecosystem processes, habitat connectivity, and requirements to address the effects of climate change, are the essential foundation of the Conservation Plan. However, the analysis of how much new renewable energy development is likely to be needed in the state as a whole, and particularly in the desert region, significantly affects the size and scope of the DRECP.

At present there is no document on the DRECP website that captures the key points of our discussion about the Acreage Calculator or your agreement that certain changes were appropriate. We are writing, therefore, to restate the key issues we raised and what we understand to be your response in order to affirmatively describe this dialogue in the public record, and we would like you to consider this letter an official public comment to be posted on the DRECP website.

Our notes from the April discussion indicate that the CEC participants in the DRECP process agreed to certain corrections to the calculator inputs, as follows:

1. Agreement to modify the projected electricity demand growth rate based upon recent downward revision in population growth forecasts for California over the time period relevant to the DRECP planning period; these include the 2010 U.S. Census data and updated California Department of Finance projections, which show the annual population growth rate averaging 0.84% per year to 2040. (It would be valuable if a brief written explanation can be provided by the CEC as to how the population growth

rate revision affects the energy demand growth rate assumed in the CEC staff modeling.)

2. A change in the plug-in hybrid electric vehicle (PHEV) utility factor—the percentage of miles traveled assumed to be supplied with electricity from the grid—was agreed to be reduced from the previous value of 90% to a more reasonable 72.6%.
3. Average land intensity required for solar development was agreed to be reduced from 9.1 Acres/MW to 7.1 Acres/MW based on more recent data.

According to our notes, the CEC's estimate of desert acreage projected for renewable energy development in 2040 that resulted from the corrections above is 214,237, a reduction from the CEC's December estimate of 315,516 acres. This was referred to by Commissioner Douglas as "a reasonable low-to-mid estimate" of acreage needs for renewables in the desert region by 2040. Staff also clearly stated at the April Stakeholder Committee that the DRECP is being developed to cover the state's renewable energy needs projected until 2040 only.

We request that the CEC publicly affirm that the specific technical corrections and revised projections to previous calculator inputs noted above were agreed to, and clarify that they apply to all scenarios (i.e., various mixes of solar and wind out to and including 2040). The statement should also clarify that the length of time the DRECP will cover is no longer than 2040.

Whatever form this statement takes, it would be important to include it as an official part of the NEPA/CEQA record and appear on the DRECP website documents page.

A new set of spreadsheets with values for each scenario currently being considered by the CEC, using the corrections that CEC agreed to, should accompany the above notice, so that everyone can transparently see what values CEC is using, and independently understand and verify the calculations. In addition, as discussed in our meeting with you and your staff, an updated version of the report on the DRECP model scenarios authored by Mr. Vidaver should be issued, describing the corrected assumptions, and providing new values for megawatts and DRECP acreage that incorporate the corrections. Since CEC affirmed that the DRECP is only being developed to 2040, only scenarios until 2040 should now be used. We would prefer that all 2050 scenarios be deleted since all agreed that there were too many variables to realistically project the renewable energy needs that far into the future. However, if the 2050 discussion in the Vidaver report is not deleted, then it should clearly state that the 2050 presentation is

for informational purposes only, and should correct the 2050 projection for growth rate, PHEV utility factor, and acres per MW.

Finally, if in the NEPA/CEQA process a scenario is developed that reflects Sierra Club's analysis that the likely need for renewables build-out in the DRECP region is in the range of 180,000 acres, as we previously estimated, we request that CEC produce a spreadsheet with revised inputs, and share it with all stakeholders. A statement should specify the modified assumptions going into this scenario, and clarify that these are separate from the agreed-upon corrections, which should be applied to all scenarios.

Clearly articulating in public documents the changes outlined above that were agreed to in the meeting you held with us, and that were presented verbally in the subsequent Stakeholder Meeting, is critical to transparency of the DRECP process, and will help all stakeholders to understand the scope of development needed to reach our renewable energy goals.

Thank you again for carefully reviewing our analysis and recommendations, and modifying some inputs to the acreage calculator, as described above. We appreciate the opportunity to help the agencies fine-tune the acreage estimate. We hope you agree that this development estimate represents the foundation on which the Plan must be built, and that it is important to clearly articulate to the public how that estimate was developed.

Sincerely,

A handwritten signature in black ink that reads "Barbara Boyle". The signature is written in a cursive, flowing style.

Barbara Boyle, Stakeholder Committee member  
Senior Representative, Sierra Club  
Beyond Coal Campaign

Cc: Stakeholder Committee members:  
Kim Delfino, Defenders of Wildlife  
Helen O'Shea/Johanna Wald, NRDC  
Joan Taylor, Friends of the Desert Mountains  
Ileene Anderson, Center for Biological Diversity  
Laura Crane, The Nature Conservancy  
Greg Suba, California Native Plant Society  
April Sall, Wildlands Conservancy

Jill Bays, Transition Habitat Conservancy

Other environmental leaders:

Bill Corcoran, Western Director, Sierra Club Beyond Coal Campaign

Jeff Aardahl, Defenders of Wildlife

Stephanie Dashiell, Defenders of Wildlife

Erin Lieberman, Defenders of Wildlife

Garry George, National Audubon Society

Lisa Belenky, Center for Biological Diversity

Sally Miller, The Wilderness Society

Energy economics consultant Robert Freehling

Terry Watt, Liaison to Governor's Office  
Kim