

Defenders of Wildlife Stakeholder Comments

Submitted by	Company	Date Submitted
Kim Delfino, California Program Director kdelfino@defenders.org (916) 201-8277	Defenders of Wildlife	February 19, 2016

Please use this template to provide written comments on the Clean Energy and Pollution Reduction Act Senate Bill 350 Study initiative posted on February 4, 2016.

Please submit comments to regionalintegration@caiso.com by close of business
February 19, 2016

Materials related to this study are available on the ISO website at:

<http://www.caiso.com/informed/Pages/RegionalEnergyMarket/BenefitsofaRegionalEnergyMarket.aspx>

Please use the following template to comment on the key topics addressed in the initiative proposal.

1. Do you think the proposed study framework meets the intent of the studies required by SB350? If no, what additional study areas do you believe need to be included and why?

Comment:

No comment at this time.

2. Five separate 50% renewable portfolios are being proposed for 2030 as plausible scenarios for the purpose of assessing the potential benefits of a regional market. Are these portfolios reasonable for that purpose, and if no, why?

Comment:

No comment at this time.

3. To develop the five renewable portfolios the RESOLVE model makes a number of assumptions resulting in a mix of renewable and integration resources for the scenario analysis (rooftop solar, storage, retirements, out of state resources etc.) Do you think the assumptions associated with developing the renewable portfolios are plausible? If no, why not?

Comment:

No comment at this time.

4. The renewable portfolio analysis assumes certain costs and locations for the various renewable technologies. Do you think the assumptions are reasonable? If no, why not?

Comment:

No comment at this time.

5. The renewable portfolio analysis makes assumptions about the availability and quantity of out-of-state renewable energy credits (“RECs”) to California. Do you think the assumptions are plausible? If no, why not?

Comment:

No comment at this time.

6. The renewable portfolio analysis makes assumptions about the ability to export surplus generation out of California (i.e., net-export assumptions). Do you think these assumptions are reasonable? If no, why not?

<p>Comment:</p> <p>No comment at this time.</p>
<p>7. Does Brattle’s approach for analysis of potential impact on California ratepayers omit any category of potential impact that should be included? If so, what else should be included?</p>
<p>Comment:</p> <p>No comment at this time.</p>
<p>8. Are the methodology and assumptions to estimate the potential impact on California ratepayers reasonable? If not, please explain.</p>
<p>Comment:</p> <p>No comment at this time.</p>
<p>9. The regional market benefits will be assessed based assuming a regional market footprint comprised of the U.S. portion of the Western Interconnection. Do you believe this is a reasonable assumption for the purpose of this study? If not, please explain.</p>
<p>Comment:</p> <p>No comment at this time.</p>
<p>10. For the purpose of the production cost simulations, Brattle proposes to use CEC carbon price forecasts for California and TEPPC policy cases to reflect carbon policy implementation in rest of WECC. Is this a reasonable approach? If not, please explain.</p>
<p>Comment:</p> <p>No comment at this time.</p>
<p>11. BEAR will be using existing economic data, and generation and transmission data from E3, the CAISO, and Brattle. These data are currently being developed. Are there specific topics that you want to be sure to be addressed regarding these data?</p>

<p>Comment:</p> <p>No comment at this time.</p>
<p>12. The economic analysis will focus on the electricity, transportation, and technology sectors to develop the economic estimates of employment, gross state product, personal income, enterprise income, and state tax revenue. These results will be further disaggregated by sector, occupation, and household income decile. Do you think these sectors are the appropriate ones on which to focus the job and economic impact analysis? If no, why?</p>
<p>Comment:</p> <p>No comment at this time.</p>
<p>13. Under the proposed study framework, both economic and environmental impacts of disadvantaged communities will be studied. Based on the study overview do you think this satisfies the requirements of SB350?</p>
<p>Comment:</p> <p>No comment at this time.</p>
<p>14. The BEAR model will evaluate direct, indirect, and induced impacts to income and jobs, including those in disadvantaged communities. Do you think additional economic analysis is required? If yes, what additional analysis is needed and why?</p>
<p>Comment:</p> <p>No comment at this time.</p>
<p>15. The environmental analysis will evaluate impacts to California and the west in five areas – air quality, GHG, land, biological, and water supply. Do you think additional environmental analysis is required? If yes, what additional analysis is needed and why?</p>
<p>Comment:</p> <p>In addition to the analysis proposed, recent landscape-scale renewable energy planning must be incorporated. Tremendous public and private investments have been made in landscape-scale planning for energy at the local, state, and federal levels (e.g., BLM’s Western Solar Energy Program, Desert Renewable Energy</p>

Conservation Plan, San Joaquin Valley Solar Assessment, WECC Environmental Data, and County renewable energy and conservation planning efforts). These planning processes have generated high-quality scientific data, particularly for vegetation and habitat values. County-led planning processes have resulted in more information on where renewable energy generation aligns with local government and community values. Additionally, natural and working landscapes are increasingly recognized for their value in sequestering carbon as well as providing biodiversity values and identified as such.

At a minimum, these data are invaluable in determining locations where renewable energy development and transmission permitting will encounter fewer barriers or delays. At best, they provide greatly improved on-the-ground information to determine where the least-impact places for large-scale renewable energy and transmission are located. We strongly support using data generated by these efforts as a foundational building block to ensure transmission and generation investments occur in areas that align with conservation and local government values, rather than being primarily driven by commercial interest. Utilizing these data, areas throughout California and the West can be identified that may be appropriate for renewable energy zones and related transmission, located on the lowest-impact lands and avoiding environmentally and culturally sensitive lands. This ultimately will provide for greater certainty for renewable energy project and transmission development, as well as protecting important natural and working lands for carbon sequestration and habitat and biodiversity values.

The Data Basin platform developed by the Conservation Biology Institute for the California Energy Commission presents an opportunity to provide the best available data, generated not only through renewable energy planning processes, but also by state and federal wildlife agencies, other agencies, and conservation institutions, transparently, to guide transmission investments to locations which align with appropriately located projects as well as conservation and community values.

The environmental analysis must also consider:

- Existing and future corridors to permit the movement of species and provide connectivity between eco-regions to provide climate change adaptivity.
- Recovery plans and critical habitat for special status species
- The intactness of a landscape and the need to avoid disrupting intact landscapes.
- It is our understanding that the land use study will include farmland but it does not mention rangeland. Rangeland is a key source of agricultural activity in the west and provides essential habitat and movement corridors for key biological resources. As such, rangeland must be considered as part of the analysis for its land use, economic and biological services

16. The environmental analysis presentation identified a number of potential indicators for the various impacts. Are the indicators sufficient? If no, what additional indicators would you suggest?

Comment:

The study area is ambitious and the biological and land use data available for the regions varies considerably in quantity and quality, particularly outside of the San Joaquin Valley and desert regions. The lack of information on sensitive species or habitats must not be construed to indicate the absence of sensitive species, resources, or biological communities. Further, the indicators cannot be viewed in isolation and the cumulative impact of changes or additions of generation and/or transmission must be considered.

The study should include a transparent accounting of when there is a lack of data in a resource area that creates a situation of uncertainty of impacts. For example, if there are few avian studies or information about migration patterns in an area considered for wind resources, that lack of information should be noted in the study outputs.

17. Other

Comment:

No comment at this time.