

<b>DOCKET</b>	
<b>09-RENEW EO-1</b>	
DATE	<u>MAR 30 2009</u>
RECD.	<u>MAR 30 2009</u>

March 30, 2009

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

Re: Docket No. 09-Renew EO-01

Dear Commission Members:

Edison Mission Energy has over 1000 MW of wind generation operating nationally with additional sites under construction, and is actively developing Solar PV projects in California. We appreciate the efforts of CEC, CDFG, BLM and USFWS to streamline the permitting of renewable electricity projects pursuant to the Governor's Executive Order.

There is agreement among many environmental advocates that renewable energy projects have least impact when water use is insignificant and when sited on land that is disturbed, degraded or located in or near highway and utility corridors. However, these types of land are most often privately-owned and consequently reviewed under Section 10 of the Endangered Species Act unless a Federal nexus can be found. The Section 10 permitting timelines presented by the USFWS ("Low-Effect HCP: 3-5 years, Standard HCP: 6-9 years") stand in disappointing contrast to those for Section 7 review of potentially pristine Federal land ("135 days by regulation, reality sometimes longer"). This paradox results in a significant disincentive to site renewable energy projects where they will have least impact, and is a serious regulatory policy flaw that should be rectified.

Successful attainment of California's renewable energy goals requires focusing your agencies' finite human resources on projects that are most likely to succeed. Electrical interconnection applications require a significant financial commitment by developers and are therefore a much better indicator of projects that are likely to succeed than are BLM lease applications, which vastly exceed the amount of new renewable projects needed to meet California's 33% goal. It appears that renewable energy projects that are subject to CEC permitting jurisdiction or on BLM land are the primary focus of the Desert Renewable Energy Conservation Plan and other process streamlining. However, the majority of renewable energy projects in the interconnection queues of the

CAISO and SCE are Wind and Solar PV projects, which aren't subject to CEC permitting jurisdiction. Specifically, of 115 interconnection applications, 62% are for Wind and Solar PV projects (49% of the 34,000 MW).

	#	%	MW	%
Wind	35	30%	6,800	20%
Solar PV	37	32%	9,900	29%
Solar Thermal	43	37%	17,400	51%
	115		34,100	

Since Wind and Solar PV comprise 62% of renewable interconnection applications, and since the Renewable Energy Transmission Initiative's Phase 1B Report identified Wind and Solar PV as among the State's least-cost renewable resources, efforts to streamline permitting of Wind and Solar PV should be given emphasis that is equal to or greater than that for Solar Thermal.

Meeting a 33% RPS will require 21-29,000 MW of additional renewable energy projects to be permitted over the next 10 years. That means that each year the jurisdictional federal, state and county agencies will have to issue permits for 2,500 – 3,000 MW, or 12-15 permits every year at the median size of interconnect applications, along with increased transmission capacity to move the electricity to load. This requires more than doubling the rate that energy project permits have been issued in California in recent years. Doubling annual permit throughput will require more than just the streamlining called for by the Governor's Executive Order. In addition, CDFG and USFWS should offer a fast-track "cookie cutter" process with standard best practices and mitigation ratio formulas for projects, up to an aggregate 40,000 acres prior to completion of the DRECP, that meet objective low-impact criteria such as:

- siting on non-BLM disturbed land or low quality habitat;
- grading no more than 30% of the project site; and
- insignificant operational water use and air emissions.

Thank you for your attention to our concerns.

Sincerely,



Gerard P. Loughman  
Senior Vice President, Development