

**INDEPENDENT
ENERGY
PRODUCERS
ASSOCIATION**

September 22, 2015

VIA E-MAIL WESTOFDEVERS@ASPENEG.COM

Billie Blanchard and Frank McMenimen
CPUC/BLM
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94014

**Re: Comments of the Independent Energy Producers Association on Draft
EIR/EIS for the West of Devers Transmission Upgrade Project**

Dear Ms. Blanchard and Mr. McMenimen:

The Independent Energy Producers Association (IEP) has reviewed the Draft EIR/EIS for the proposed West of Devers Upgrade project and offers these comments on the Draft.

IEP has determined that the Draft's identification of the environmentally preferred alternative to the project as proposed may be short-sighted. As the Draft recognizes, renewable energy makes a significant contribution toward meeting California's greenhouse gas emissions reduction goals. As part of the State's effort to reduce greenhouse gas emissions, the Legislature has recently passed Senate Bill 350, which increases the Renewables Portfolio Standard to 50% of retail electricity sales by 2030, and the Governor is expected to sign the bill into law. Meeting the new RPS goals present a considerable challenge, and greater access to renewable energy will be necessary if the State is to meet these new goals.

The Proposed West of Devers Upgrade is ideally situated to connect high-quality sites for wind, solar, and geothermal resources with the Los Angeles load center. The proposed project has the capability to transfer roughly 1000 megawatts of renewable energy more than the environmentally preferred alternative. Over the life of the Upgrade project, the environmental and other benefits of this potential increase in the supply of renewable energy to meet Southern California's demand for electricity will far outweigh the initially greater environmental impacts related to construction of the Proposed Project.

The Final EIR/EIS should recognize the added environmental benefits that will result if an additional 1000 MW is available to transfer renewable energy from the desert areas and Southwestern states to meet California's higher RPS goals. IEP respectfully urges the Commission to consider these additional benefits and to approve the Proposed Project as the route for the West of Devers Upgrade.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Jan Smutny-Jones', written in a cursive style.

Jan Smutny-Jones, Chief Executive Officer
Independent Energy Producers Association