

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking Pursuant to
Assembly Bill 2514 to Consider the Adoption of
Procurement Targets for Viable and Cost-Effective
Energy Storage Systems

R.10-12-007
(Filed December 16, 2010)

**OPENING COMMENTS OF
CALIFORNIA HYDROPOWER REFORM COALITION**

Pursuant to the “Order Instituting Rulemaking” (Dec. 21, 2010), California Hydropower Reform Coalition (CHRC) files these comments on the issues of fact and law which we believe are relevant to the scope of the proceeding.

Interests of Party

CHRC is an association of conservation groups. Our mission is to protect, enhance, and restore California’s rivers and watersheds adversely affected by hydropower operations. Since 1997 CHRC has participated in related proceedings of general applicability including I.02-04-026, which approved the reorganization of Pacific Gas and Electric Company.

Our governing board consists of American Rivers, American Whitewater, California Outdoors, California Sportfishing Protection Alliance, California Trout, Foothill Conservancy, Friends of the River, Natural Heritage Institute, South Yuba River Citizen’s League, and Trout Unlimited. These members also participate in licensing proceedings for individual hydropower projects throughout the state.

We support timely achievement of the Renewable Electricity Standard of 33%, as adopted by the California Air Resources Board in Resolution 10-7-1. We similarly support AB 2514’s goal of developing and deploying additional energy storage on a scale necessary to support new renewable power sources, which are often intermittent and off-peak. Our specific interest in this proceeding is to encourage storage technologies which do not increase existing adverse effects of electricity generation on our aquatic ecosystems. We will largely focus on pumped storage, a form of hydropower technology.

Categorization

We concur that this proceeding is quasi-legislative.

Need for Hearing

We believe that a hearing will be necessary to resolve disputed f actual issues as necessary to review, weigh, and distribute the costs and benefits associated with various storage technologies. Rulemaking Order, p. 5.

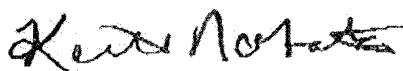
Issues of Fact and Law

We request that the scope include the following issues, which addr ess applicable environmental review and permitting requirements for energy storage technologies. These requirements will affect comparative cost-effectiveness of such technologies (Pub. Util. Code § 2836.2(d)), as well as the achievability of procurement targets for load-serving entities (§ 2836(a)(1)) and publicly owned utilities (§ 2836(b)(2)).

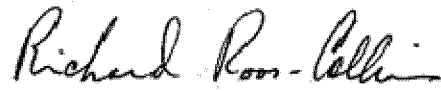
1. How do the environmental impacts of energy storage technologies compare?
2. On a regional basis, what cumulative environmental impacts may result from the deployment of pumped storage on a scale which supports the 33% RES? Is it reasonable to expect that the mitigation measures which will be required to site individual facilities will be effective to protect aquatic ecosystems on a regional basis?
3. What measures should be required or undertaken by the Commission or other State agencies to encourage manufacture of storage technologies in California?

Dated: January 21, 2011

Respectfully submitted,



Keith Nakatani
Director,
CALIFORNIA HYDROPOWER REFORM COALITION



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Certificate of Service
PUC R.10-12-107

I hereby certify that I today served a copy of "Opening Comments of California Hydropower Reform Coalition," by electronic or first-class mail to each person on the attached Service List in this proceeding.

Dated: January 21, 2011



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