

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

Order Instituting Rulemaking to Integrate
and Refine Procurement Policies and
Consider Long-Term Procurement Plans.

Rulemaking 12-03-014
(Filed March 22, 2012)

REPLY COMMENTS OF THE VOTE SOLAR INITIATIVE

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June 11, 2012

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

Order Instituting Rulemaking to Integrate
and Refine Procurement Policies and
Consider Long-Term Procurement Plans.

Rulemaking 10-05-006
(Filed May 6, 2010)

REPLY COMMENTS OF THE VOTE SOLAR INITIATIVE

Pursuant to the May 17, 2012 *Scoping Memo and Ruling of Assigned Commissioner and Administrative Law*, The Vote Solar Initiative (“Vote Solar”) submits the following reply the May 31, 2012 comments on the May 10, 2012 “Energy Division Straw Proposal on LTPP Planning Standards” (“Staff Proposal”).

Page 3 of Southern California Edison’s (“SCE”) comments states:

The results of that 2010 LTPP analysis demonstrated that different renewable portfolio assumptions did not significantly change the need for flexible resources to integrate intermittent generation. Any further analytical effort of different renewable portfolios will consume analytical resources, detract from other more impactful work, and are unlikely to yield additional knowledge about the need for flexible resources to integrate intermittent resources than was derived from the 2010 LTPP analysis.

Vote Solar agrees with SCE’s conclusion that the four *specific* renewable portfolios considered in the 2010 LTPP analysis essentially rendered flexible resource need differentials too small to be useful for sensitivity analysis. Nevertheless, the

“environmental” case, which included enough incremental distributed generation (DG) to approach significance, points directly at a need to further explore a much wider range of assumptions for renewables. Accordingly, Vote Solar equally disagrees with SCE’s conclusion that analysis of expanded renewable portfolios would be worthless. Instead, Vote Solar contends that the take-away from the LTTP 2010 analysis is that the LTTP 2012 analyses should consider scenarios with much broader ranges for the installation of renewable energy developments and the installation of distributed solar.

Vote Solar generally supports the comments of CEJA, Sierra Club and IREC. Specifically, Vote Solar completely agrees with CEJA’s conclusions at pages 2 through 6 regarding minimizing greenhouse gas emissions and adherence to Energy Action Plan II (“EAP II”). Indeed, the Staff Proposal’s proposed planning assumptions do not take into account possible future measures, incentives or legislative actions that might dramatically affect the amount of Energy Efficiency (“EE”), Demand Response (“DR”), Distributed Generation (“DG”) or storage available as flexible system resources.

Pursuant to EAP II’s loading order, these resources form a set of important and high priority possible procurement solutions for managing systems needs identified in any given scenario. Once a rationale for procuring long-term system resources is established, however, it becomes very difficult to model a posteriori the effectiveness and impact of any putative future package of incremental EE, DR, DG or storage. Thus, to ensure the widest scope of possible flexible system resource solutions now and in the future, the planning scenarios should consider much larger amounts of DR, EE, DG and storage in the resource mix.

The German grid, with 22 GW of net solar capacity coming online in about five years¹ (a period well smaller than the current planning horizons for the LTTP) is evidence of the possibility of extremely rapid and robust distributed solar build out, and thus illustrative of the need to model broader renewable portfolio sensitivities as well as widen the possible system flexible resource solution set as much as possible. Given the speed

¹ http://www.renewable-energy-industry.com/press-releases/press-releases_detail.php?changeLang=en_GB&newsid=4168

at which they can be deployed in large measure and the material impact they can have on system needs, large increases in EE, DR, DG and storage are a reasonable case to bracket in the planning scenarios.

WHEREFORE, Vote Solar respectfully requests the Commission consider the above stated reply comments.

Respectfully Submitted,

_____/s/_____

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