

**Comments of the Center for Energy Efficiency and Renewable Technologies  
On the Infrastructure Need Assessments for the 2011 Integrated Energy Policy  
Report**

Docket #11-IEP-1E Transmission Planning  
December 17, 2010

<b>DOCKET</b>	
<b>11-IEP-1E</b>	
DATE	DEC 17 2010
RECD.	DEC 17 2010

Submitted by:

David Miller  
Low Carbon Grid Program Coordinator  
Center for Energy Efficiency and Renewable Technologies  
1100 11<sup>th</sup> Street, Suite 311  
Sacramento, CA 95814  
(916) 340-2638  
[david@ceert.org](mailto:david@ceert.org)

---

The Center for Energy Efficiency and Renewable Technologies (CEERT) appreciates the opportunity to provide feedback on the CECs Infrastructure Need Assessments for the 2011 Integrated Energy Policy Report. In the interest of moving forward with California's aggressive renewable energy goals, CEERT offers the following comments.

CEERT fully supports the unifying vision presented by the recently published *California Clean Energy Future* document and would like to further emphasize the importance of continuing coordination between the California Energy Commission (CEC), the California Public Utilities Commission (CPUC), the California Independent System Operator (CAISO), and the California Air Resource Board (CARB). While CEERT recognizes the complexity of the types of analysis conducted by the respective agencies, CEERT believes that careful coordination of input assumptions, scenarios and modeling methodologies is necessary between these agencies to create a streamlined and non-duplicative environment that can efficiently foster development of the resources required to support load growth as well as policy and reliability objectives.

In addition CEERT would like to encourage the CEC to expand its concept of "infrastructure needs" to include technologies, whether physical or operational, that facilitate inter-balancing area cooperation or consolidation, whether real or virtual.<sup>1</sup> Such balancing area coordination has been demonstrated to be an effective way in which to integrate large amounts of renewable energy on the electric grid,<sup>2</sup> and while there are significant technical and operational challenges to such inter balancing area

---

<sup>1</sup> See, for example, the WECC Efficiency Dispatch Toolkit, [www.wecc.biz/committees/EDT/Pages/default.aspx](http://www.wecc.biz/committees/EDT/Pages/default.aspx)

<sup>2</sup> See, for example, *Western Wind and Solar Integration Study*, National Renewable Energy Laboratory, May 2010

cooperation, such an approach is both cost effective and an efficient utilization of balancing resources.

CEERT would also like to encourage the consideration of aggressive Demand Response practices as another low cost way of achieving resource optimization and grid reliability.

CEERT believes that expanding the concept of “infrastructure needs” to encompass inter balancing area coordination and consolidation, whether real or virtual, along with aggressive Demand Response, will provide a cost effective way in which to reliably integrate large amounts of renewable energy on the electric grid.