

**COMMENTS OF THE CALIFORNIA FARM BUREAU FEDERATION REGARDING  
THE PROPOSED 2012-14 TRIENNIAL INVESTMENT PLAN FOR THE ELECTRIC  
PROGRAM INVESTMENT CHARGE PROGRAM**

California Energy Commission

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The California Farm Bureau Federation (“Farm Bureau”) appreciates the opportunity to provide comments on the California Energy Commission Draft Staff Report for the Electric Program Investment Charge Proposed 2012-14 Triennial Investment Plan (“Plan”). Although there are a number of areas of interest in the Plan to the over 74,000 farmer and rancher members of Farm Bureau, these comments address only Chapter 5: Market Facilitation, section S14. Section S14 addresses initiatives for collaboration with local jurisdictions and stakeholder groups in IOU territories to establish strategies for enhancing current regulatory assistance and permit streamlining efforts that facilitate coordinated investments and wide-spread deployment of clean energy infrastructure. Farm Bureau is supportive of such efforts that continue to recognize the importance of local control over land use decisions, since it is local jurisdictions that know and understand the long term opportunities and implications from siting renewable energy. Along with its local County Farm Bureaus, we continue to have great interest and concerns over the consequences of eroding available productive farmland in the state. To the extent there can be greater focus on strategic placement of infrastructure to minimize impacts to farmland resources the state stands to benefit. The need to minimize impacts is particularly implicated from solar projects which require about 7 acres for each MW of capacity.

**Section 14.1** would establish pilot projects for greater coordination with electric infrastructure and land-use planning and polices, targeting areas where local

governments and utilities prefer to locate renewable generators. The location of existing electric infrastructure put in place well before the onset of the pressure from renewable generation development has greatly influenced the preferences for siting renewable generators near the infrastructure. As a result locating renewable generation has become much more of a calculation about how close to get to the infrastructure than what land is most appropriate for development. The consequences have been time and time again to place development pressure on productive farmland. The pilot provides an opportunity to refocus the consequences by examining the land use priorities for local jurisdictions and fitting infrastructure changes to match those priorities. As the Plan in this section addresses there is recognition of the need to pursue investments in the distribution grid to accommodate LER at appropriate locations. In some cases local governments' planning does direct parties to the land use types on which they prefer to see technologies installed, but the electric infrastructure does not accommodate the planning preferences. If such a pilot moves forward, options to balance the economic and resource values of farmland with siting options clearly fit in a framework of pursuing infrastructure changes that better accommodate appropriately placed LER.

**Sections 14.2-5** address the need to assist local jurisdictions with planning tools and policies in addressing the development pressures from renewable generation interests, particularly with respect to solar generation. Although the materials in those sections indicate an effort to broaden the scope of development of renewable resources, because the focus leading to these discussions and planning efforts have been centered on solar projects so extensively it will take concerted efforts to broaden the

scope. An expansive portfolio of renewable sources benefits ratepayers and can minimize land use impacts. In many cases, as the Commission has been informed in various contexts, other forms of renewable resources, such as bioenergy, address multiple resource issues for the state. To effectively broaden the scope of resources, it will be necessary for these types of initiatives that the funding is targeted in a manner that rewards greater emphasis on a broad portfolio of technologies.

Farm Bureau appreciates the extensive review the CEC has conducted to identify appropriate projects and plans that meet the EPIC objectives. As section S14 identifies, local jurisdictions have been faced with many planning challenges as a result of renewable generation development pressure, most significantly solar projects of varying size levels. In a number of cases they have found workable solutions. Project funding for EPIC should not presuppose that planning must be fashioned to accommodate any particular generation resource, but instead look to the full range of renewable energy options in order to balance the planning objectives of local jurisdictions with the renewable goals of the state.

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Respectfully submitted,



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