

To: David Harlow, Director, Desert Renewable Energy Conservation Plan
From: Michael Azeka, AES Wind Generation, LLC
Date: August 9, 2012
Subject: Comments to DRECP Alternative Briefing Materials
Docket No. 09-RENEW EO-01

On behalf of AES Wind Generation, LLC, an established wind developer in California, we are writing to provide comments on the DRECP Alternative Briefing Materials dated July 25, 2012. We understand the five Alternatives presented in the July 25, 2012 DRECP Alternatives Briefing Materials are intended to support the DRECP's timeline for renewable development, to the year 2040.

Within large tracts of land designated as biologically sensitive in the Alternatives are many portions that are not sensitive. Clearly, either better data or better policies that allow flexibility for future site-specific studies that confirm the actual conditions are needed. The Alternatives eliminate large swaths of land because some sensitive portions occur in otherwise non-sensitive sites, resulting in the elimination of vast windy areas of the state. When you add the large acreages restricted from wind due to DOD conflicts, airborne radar testing restrictions, transmission restrictions, legislatively and legally protected areas, visually sensitive areas, and residentially developed lands, it leaves relatively few windy areas available for development. We understand the DRECP staff is indicating that more information, and we believe, more restrictions will be identified by December 2012. Considering all these factors, we believe the current five Alternatives fail to identify anything close to enough wind resource acres that are sufficiently windy for developers to pursue financially viable wind energy projects.

We are very concerned that with limited funding for the Fish & Wildlife Service and other public agency participants, the DRECP will be rushed to adoption with a plan that is inadequate, that insufficiently considers balanced goals, that is formed on incomplete science, and that results in severely hampering wind power for the next 28 years. For example, it was pointed out at the July 25-26 meeting that the mapping needed refinement, not all mapping data has been received, the biological information is incomplete, and most avian studies are unsubstantiated. As we are getting close to the final Alternatives that will form the basis for the Environmental Impact Report/Environmental Impact Statement, we are anxious that a poorly assembled plan and Alternatives will be pushed forward, and little wind energy will result.

The Development Focus Areas (DFA's) in the Alternatives include low wind speed lands that are not usable by the wind industry if the wind output is not commercially viable. Low wind speeds result in more expensive electricity and less electricity generated. Simultaneously, the low cost and abundant supply of natural gas will set a low market price for electricity for most of the next 10 years, based on expert forecasts. Consequently, restricting wind power way from the

higher wind speed sites will kill the economic viability of wind power in California, resulting in little growth of wind power, fewer jobs, less tax revenue, and less pollution-free and low water use electricity.

Based on these reasons, we request the DRECP Alternatives include substantially more high wind speed lands (greater than 6.5 m/second) so that a significant portion of California's renewable energy goals can be met by the lowest cost, most proven renewable electric source, wind power.