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California Energy Commission
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To:
California Energy Commission
Dockets Office, MS-4
Docket No. 09-RENEW EO-01
1516 Ninth Street
Sacramento, CA 95814-5512

DRECP Planners:

My name is Robert Howells. I am a fifth-generation native of the High Desert and a Lucerne Valley property owner.

I contend that the DRECP has not seriously considered an alternative that would emphasize distributed generation, nor has it sufficiently analyzed currently available data on that subject. As a result, the plan is based on outdated assumptions. Doing the necessary analysis would substantially change the plan's conclusions.

The DRECP is predicated on the erroneous assumption that large swaths of California desert must be sacrificed to build industrial-scale energy plants to meet future energy needs. That assumption was barely relevant at the time of the DRECP's inception. Today it's clearly wrong.

I urge the DRECP planners and reviewers to reframe the document's assumptions. You bear a great responsibility. Do not rush headlong into wide-scale destruction of the California desert. You would be wise to adopt the Hippocratic oath: "First, do no harm."

To proceed with any of the current alternatives would cause great harm to the California desert. You would obliterate hundreds of thousands of acres of flourishing ecosystems—which, ironically, have tremendous carbon-sequestration value. If the ultimate purpose of the DRECP is to minimize greenhouse gases, your plan would ironically be *increasing* greenhouse gases in a misguided attempt to minimize them.

We have available a diverse arsenal of alternatives that would render irrelevant the DRECP's push to destroy hundreds of thousands of acres of desert. Point-of-site energy generation is not some pie-in-the-sky dream. It is a functioning reality. Rooftop solar and other forms of distributed generation are proven methods that can readily produce sufficient electricity to meet our current and future needs—a future that will undoubtedly also employ far greater efficiencies than currently exist.

I fully understand that relying upon distributed generation will require some fundamental changes in our transmission and utility systems. Some intelligent engineering will be required to maintain grid stability. But the DRECP, by adopting an alternative based on conservation and distributed generation, can take a leadership role in forging the way toward a clean-energy future that spurs these innovations. Surely this is more desirable

than the plan's current crude destruction of the desert and inefficient methods of transmission.

The DRECP as currently configured offers no analysis of the current and projected potential for distributed generation. This is inexcusable and irresponsible. Without such analysis, the DRECP could go down in infamy as the foolish document that permitted extensive and unnecessary destruction of the California desert.

I urge the DRECP planners to rethink their assumptions, do the requisite analysis, and draft a plan that utilizes currently built environments to solve our energy needs.

Sincerely,

Robert Howells
Lucerne Valley, CA 92350