March 30, 2023

California Energy Commission
Docket No. 22-IEPR-02
Docket Office
1516 Ninth Street
Sacramento CA 95814

Submitted Electronically via CEC website to Docket 22-IEPR-02

Re: Land-Use Screens for Electric System Planning

The California Wind Energy Association (CalWEA) offers these brief comments on the draft techno-economic, land-use and economic renewable energy resource screens presented at the March 13, 2023, workshop.

First, we once again express our appreciation for the opportunities for dialogue that Erica Brand (CEC) and Jared Ferguson (CPUC) have provided during this process. As a result, we are supportive of the results of this effort so far. Specifically, we greatly appreciate the agencies' use of updated wind technology information from NREL and a 110-meter hub-height as the basis for the analysis, which demonstrates much greater in-state wind energy potential than previously recognized. We also appreciate the removal of the cropland and tribal lands screens for wind resources, given the potential compatibility of wind turbines in these areas. Finally, we applaud the addition of "disclaimer" language on the slides (which presumably will carry through to any written reports) emphasizing that this analysis is intended for electric system planning and is not intended to inform project-specific impact analysis.

Our additional recommendations are as follows:

- Given the enormous (84 gigawatt) wind resource potential remaining after the draft land-use screens, CalWEA recommends narrowing down the focus to wind resources of 6.5 meters/second (m/s) and above. At 110 meters hub height, construction costs are higher, and 5.5 m/s wind resources are less likely to yield economically feasible projects. A 6.5 m/s screen may also sufficiently limit the wind resource potential such that, together with busbar mapping, more arbitrary discount factors will not be needed.

- Although the "climate study" screen, which will remove climate resilience areas, is proposed to be used only as a sensitivity, CalWEA recommends developing a corresponding screen for climate-degraded areas. Desert areas are already becoming less habitable for many species[1] and may become more suitable for renewable energy development.

CalWEA appreciates this opportunity to comment.

Sincerely,

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[1] See, e.g., "California deserts have lost nearly 40% of plants to hotter, drier weather, satellite data shows," *Palm Springs Desert Sun* (June 22, 2021).