

January 30, 2017

**Comments of the Independent Energy Producers Association  
Regarding the Scoping Order for the 2017 Integrated Energy Policy Report.  
(Docket No. 17-IEPR-01)**

The Independent Energy Producers Association (IEP) submits these comments on the Scoping Order for the 2017 Integrated Energy Policy Report (“Scoping Order”). IEP recognizes that these comments are being submitted after the conclusion of the formal commenting period; however, IEP requests that these comments still be considered as part of the planning process for the 2017 Integrated Energy Policy Report (IEPR) if possible.

**IEP Supports the CEC’s Attention to Energy Reliability Issues.** IEP supports the California Energy Commission’s (CEC) focus on ensuring energy reliability in Southern California given “the closure of the San Onofre Nuclear Generating Station coupled with the retirement of natural gas electricity generation facilities in the region” (Scoping Order, page 2). The CEC is uniquely positioned to consider the effects of these plant closures on the electricity system as a whole and on reliability of the region specifically. It is appropriate for the CEC to monitor the retirement of these plants and evaluate what these retirements mean for the system overall.

**IEP Supports a Multi-Year Forward Resource Adequacy Reporting Obligation.** In the Scoping Order, the CEC notes that it “will examine forward contracting of flexible resources including an evaluation of how much flexible capacity is available under multi-year contract, estimation [of] the reserve margin, and identification of any actions needed to better ensure

reliability” (Scoping Order, page 3). IEP supports these goals. Furthermore, IEP recommends that the CEC work collaboratively with the other energy agencies to establish a clear and transparent multi-year forward resource adequacy reporting obligation that will allow policy makers to identify where deficiencies lie, so that course corrections can be made as appropriate, in a timely manner. A reporting obligation ought to be aligned with a procurement obligation when deficiencies are shown.

**Additional Renewable Procurement May be Warranted Sooner, Rather than Later, to Take Advantage of Expiring Tax Credits.** IEP recommends that the CEC look at the timing of procuring replacement power for the retirement of the Diablo Canyon Nuclear Power Plant. Additional renewable procurement may be warranted earlier than currently envisioned to take advantage of expiring tax credits that decrease the cost of renewable procurement in general. IEP recommends that the CEC investigate the timing of replacement and the potential cost savings that may result by procuring additional renewable resources earlier in terms of replacing the Diablo Canyon Nuclear Power Plant.

IEP appreciates the opportunity to comment on the CEC’s Scoping Order for the 2017 IEPR.

Respectfully Submitted,



Steven Kelly  
Policy Director  
Independent Energy Producers Association  
1215 K Street, Suite 900  
Sacramento, CA 95814  
(916) 448-9499  
[steven@iepa.com](mailto:steven@iepa.com)



Amber Blixt  
Policy Analyst  
Independent Energy Producers Association  
1215 K Street, Suite 900  
Sacramento, CA 95814  
(916) 448-9499  
[amber@iepa.com](mailto:amber@iepa.com)