

Renewable Energy Systems

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Renewable Energy Systems (RES) Americas Inc. appreciates this opportunity to provide the Western Governor's Association (WGA) with comments on the Western Renewable Energy Zone (WREZ) Project. RES Americas has been a leading wind energy company in the US since 1999 and developed and/or constructed 25-30% of the wind energy MWs to the U.S. grid in 2007 and 2008. In total, RES Americas has developed and/or constructed 3,500 megawatts (MW) of renewable energy in the U.S.. RES Americas is actively pursuing wind and solar projects within the WREZ Project area. The following are our comments and questions:

General WREZ Project Process

1. RES commends WGA efforts to openly seek input from a variety of stakeholder groups. Meetings and tele-conferences have been well noticed and organized. However, many attendees (particularly renewable industry participants) are only allowed to observe the conference calls and are unable to provide input. Therefore, stakeholder representation is inequitable. Additional members of industry should be invited as "representatives" rather than just "observers."
2. Comments and responses to comments should be posted to the WGA WREZ web page to facilitate the open process.
3. How will the WGA insure consistency with state initiatives (such as California's RETI process)? How will deviations be managed so as not to undermine state initiatives?
4. On one of the conference calls that RES Americas was 'observing', there was a discussion on mitigation. Mitigation should not be a part of the WREZ Project and should be addressed on a project-by-project basis under existing regulatory processes.
5. It would be very helpful for WGA to post a list of terms and definitions on the WREZ Project web page to insure a consistent understanding of terms being used by WREZ Project participants and stakeholders,.

Data Gathering and Modeling

6. RES Americas commends the breadth and depth of data gathering to identify and map areas of environmental importance. This is a huge task! However, it is important that all data used be transparent (where did it come from, how was it processed, etc.). It would be great if all maps, reports and other documents had a link to the metadata files for the data. What is the process for screening the quality of environmental data being used? A quality assurance/quality control process should be established and fully described on the WREZ Project web page.
7. Data being used to identify QRAs has the potential to be viewed by some (state and federal regulatory agencies, non-governmental organizations, NIMBY groups, etc.) as having a higher level of accuracy than is possible on large scale maps. To avoid this disclaimers, footnotes, and other warnings should be added to all products created by the WREZ Project stating that individual sites have their own unique environmental characteristics that may not be apparent at the scale or resolution used on WREZ maps. There should be a clear explanation that the data used to identify QRAs is not intended to be a constraints analysis for individual sites. Additionally it should be noted that renewable energy development outside of designated areas may be appropriate and

environmentally acceptable even if they appear to be in less preferable areas on WREZ maps.

8. WGA should provide a disclaimer stating that the QRA designations/conclusions are based on a model. Models by definition have inherent errors and are only as good as the weakest data source. WGA should include a disclaimer similar to the disclaimer contained on much of NREL's publications and maps to avoid confusion and misuse of the model results.

Exclusion and Initial Avoid List

9. The word 'Exclusion Areas' should be strictly limited to those areas that are legally regulated to not permit energy development. It would be more appropriate to use "less preferable" rather than "initial avoid list" when describing areas that are outside of the QRAs but not legally off limits.
10. The "initial avoidance list" includes Bureau of Land Management (BLM) Areas of Critical Environmental Concern (ACEC) for wind and solar development. Regarding ACECs, the WREZ Project should refer to BLM Instruction Memorandum No. 2009-043, which states, "Wind energy development is permitted in one National Conservation Area, the California Desert Conservation Area (CDCA), in accordance with the provisions of the California Desert Conservation Area Plan 1980."
11. Regarding the inclusion of 'Visual Resource Management Class I and II' in the initial avoid list should conform to BLM Instruction Memorandum No. 2009-043, which states, "The VRM management classes are not intended to be used to exclude or preclude land uses, including opportunities for development of wind energy in areas with high wind energy resource potential... The VRM management class designations must be carefully considered in areas with high wind energy resource potential (wind power class 5 and above)." Please provide documentation and regulation stating that BLM Visual Management Class I and II areas are excluded from renewable energy development. Only Class I appears to be an avoidance area.
12. The inclusion of BLM RMP designated lands which have development constraints such as 'OHV open areas' and 'Special Recreation Management Areas' should not be included in the initial avoid list as development of renewable energy may occur in these areas. And their initial avoidance could eliminate significant portions of some states where current renewable energy projects are being developed.

Generation and Transmission

13. It is RES Americas' understanding that the American Recovery and Reinvestment Act of 2009 that was signed by President Obama on February 17, 2009, included provisions for additional transmission. Will the funding designated in the act of Congress be used for any of the transmission lines be identified in this process?
14. Does the WREZ Project analysis supplement state-by-state assessments to provide a picture of potentially lower cost renewable energy generation alternatives? If so, how do the results compare?
15. How is the WREZ Project process determining the appropriate amount of transmission to build? What assumptions in generation capacity are being modeled?

16. How does the WREZ Project process compare to the Competitive Renewable Energy Zones process completed by Texas Public Utility Commission?
17. How will capacity on the new transmission lines be allocated between renewable energy and other generation types?