

# **Permitting Renewables in California**

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# Good Luck!

*Bring lots of \$\$\$\$\$*

## ***Observation:***

***The requirements for  
permitting renewables are  
out of sync with the policies  
driving the need for renewables.***

# Why?

## **Process Evolution:**

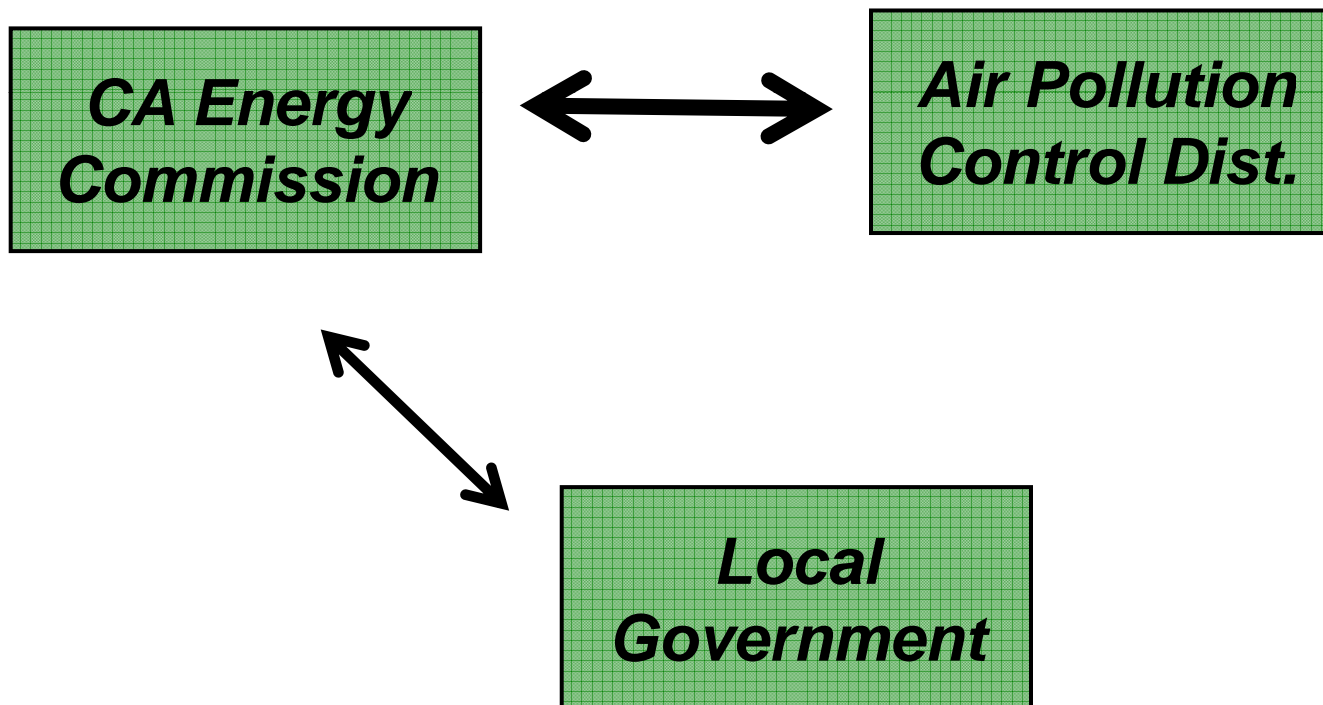
**Permitting process  
evolved over past 30 years  
primarily based on natural gas  
power plants.**

# Why?

## **Other factors:**

- **Unfamiliar technologies**
- **Very large sites**
- **Huge workload / Insufficient resources**
- **Less experienced staff**
- **Data creep**
- **Ideal practices**
- **Additional agency coordination**
- **Undeveloped communication channels**
- **New developers / applicants**

# Natural Gas Power Plant Permitting Coordination



# Large Solar Power Plant Permitting Coordination

**CA Energy  
Commission**

**U.S. Dept. of  
Energy**

**National Park  
Service**

**U.S. Fish &  
Wildlife**

**Air Pollution  
Control Dist.**

**U.S. Army  
Corps of Egrs.**

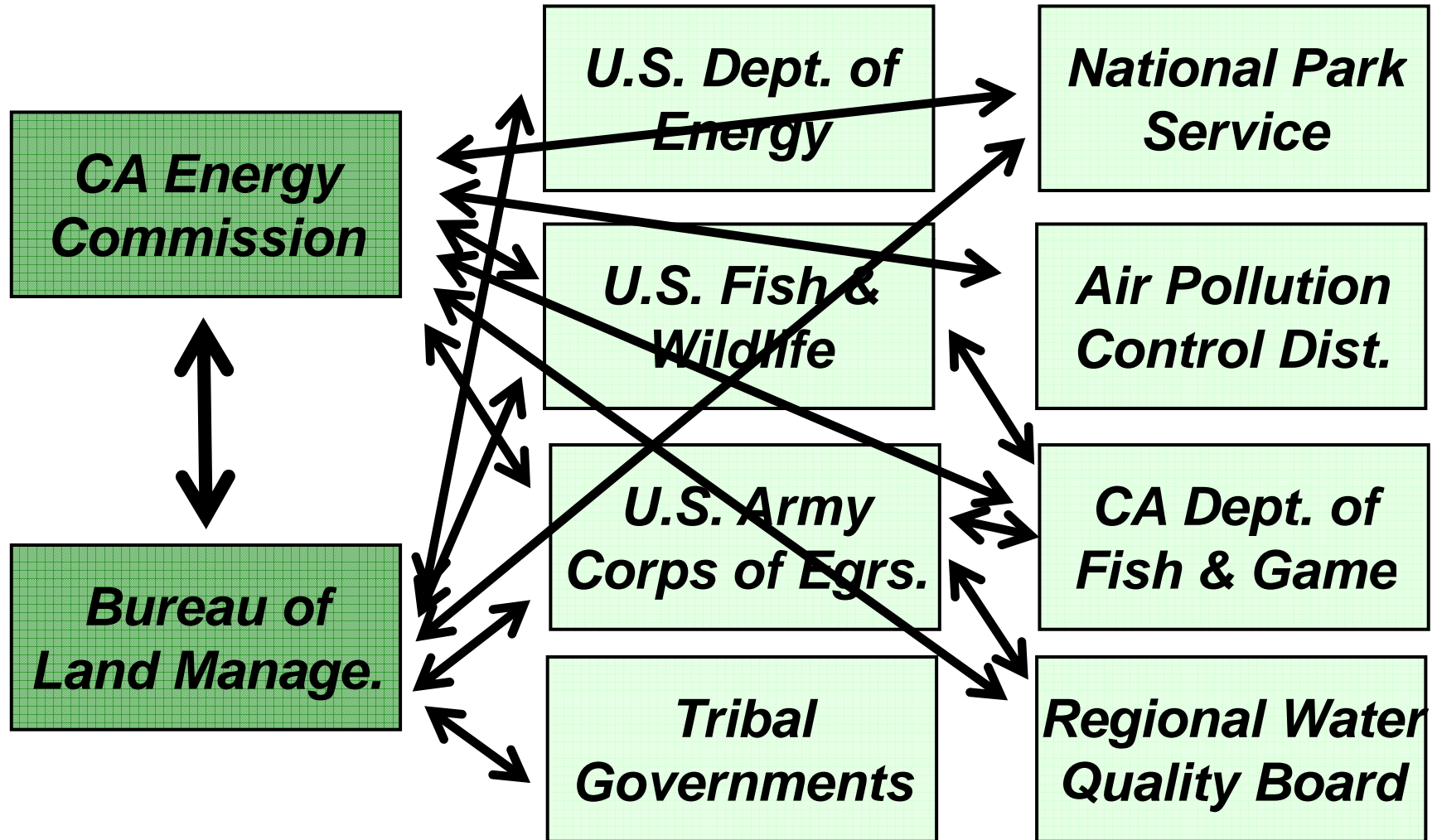
**CA Dept. of  
Fish & Game**

**Bureau of  
Land Manage.**

**Tribal  
Governments**

**Regional Water  
Quality Board**

# Large Solar Power Plant Permitting Coordination



# **Case Study: LUZ / Tessera Solar**

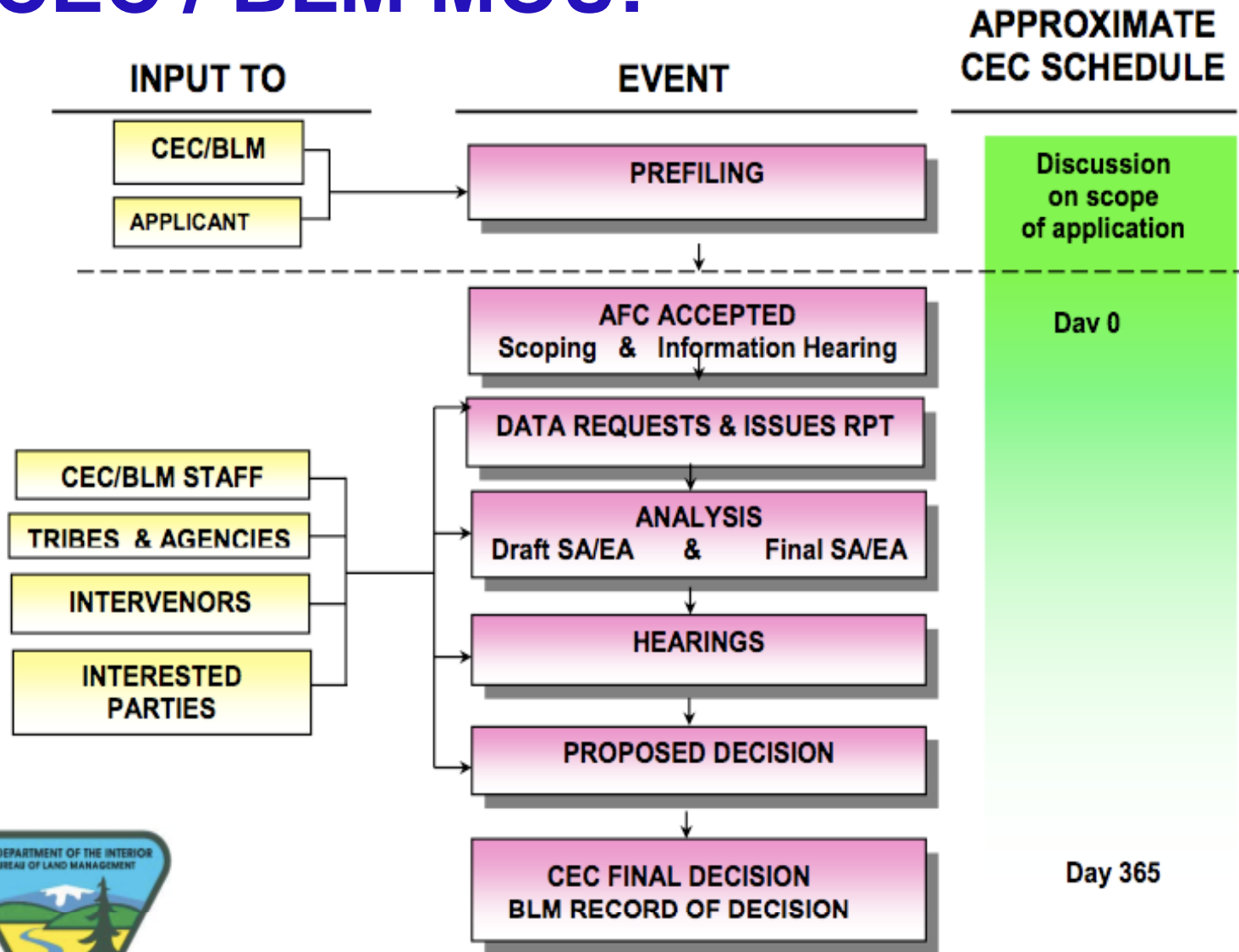
## **Harper Lake**

- 80 MW**
- 650 acres**
- Private land**
- 8 to 14 months**
- In lieu mitigation**
- No RPS or GHG**

## **Imperial Valley**

- 750 MW**
- 6,500 acres**
- Public land**
- 23 months (?)**
- No in lieu mitigat.**
- RPS & GHG**

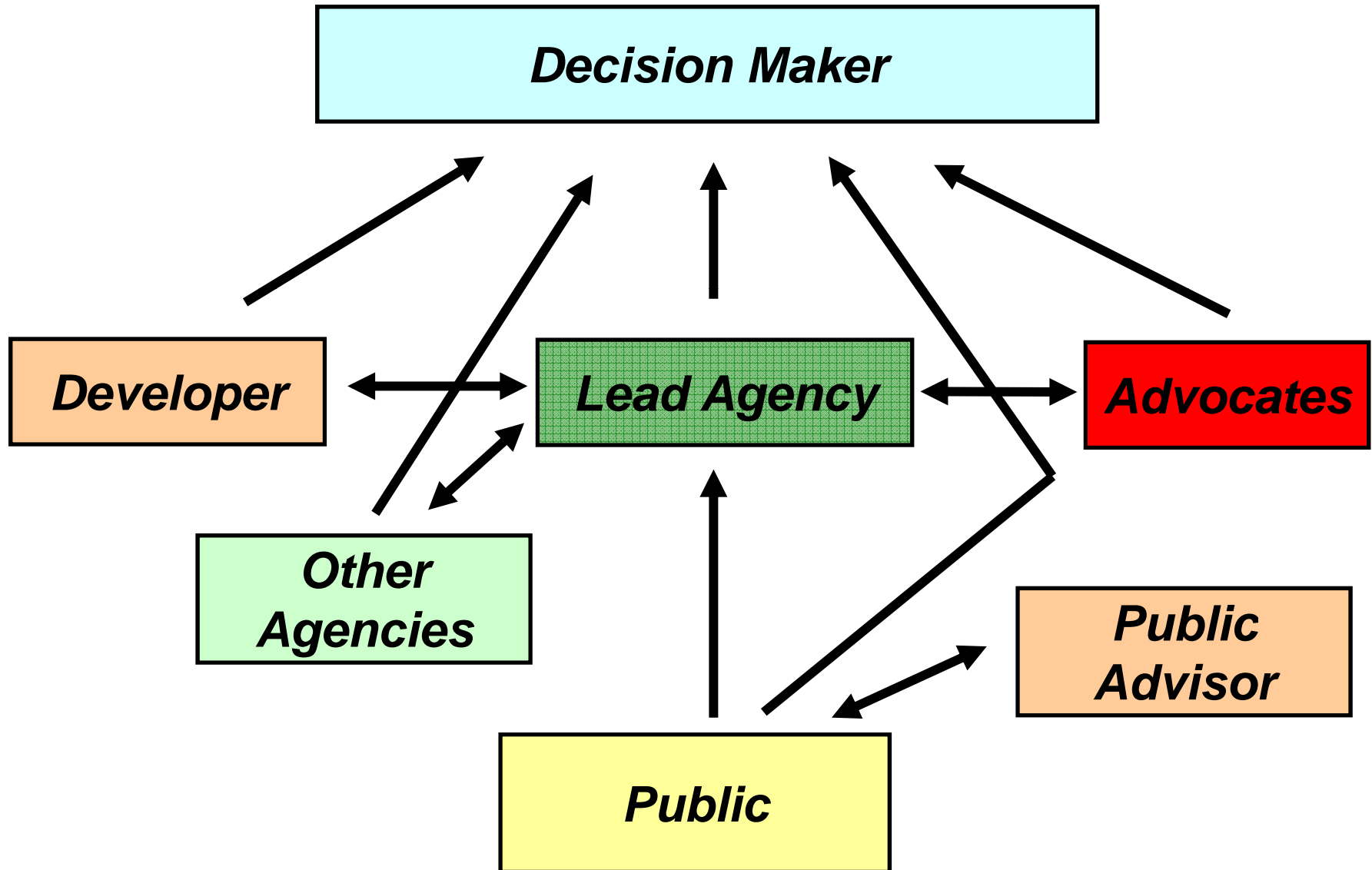
# CEC / BLM MOU:



# Hearing Process

- **Procedure vs Substance**
- **Build Record – Eye to appeal**
- **Make case with cross?**
- **Protect Agency conclusions**
- **No surprises**

# Permitting Process Participants



# **Is the process appropriate?**

- **Fundamentals are conceptually sound**
- **Problems in execution:**
  - **Communication**
  - **Coordination**
  - **Reasonableness**
  - **Consistency with overall policy objectives**

# **What can agencies do?**

- 1. Make permitting requirements consistent with policy objectives**
- 2. Require reasonable / appropriate data**
- 3. Get all levels of all agencies on the same page**
- 4. Develop programmatic mitigation**
- 5. Resolve resource and administrative problems**

# What can agencies do?

**Fix the relationship between:**

- **transmission planning**
- **power procurement**
- **transmission interconnection**
- **generation permitting**
- **transmission permitting**

# **What can environmental groups do?**

- **Reflect their state/national policies at a local/project level**
- **Provide early, up-front guidance to developers and agencies**

# **What can developers do?**

- 1. Don't expect a free ride**
- 2. Understand the processes**
- 3. Talk to all the agencies all the time**
- 4. Work with (educate) the public and interest groups**
- 5. Minimize project changes**