

From: Peterson, Robert

Sent: Monday, October 12, 2015 5:31 PM

To: Scott Morgan; CEQA Guidelines

Cc: Mulligan, Jack M.; Chen, Connie; Barnsdale, Andrew; Borak, Mary Jo

Subject: CPUC comment on 8/2015 Preliminary Discussion Draft of proposed updates to the CEQA Guidelines

Hi Scott and OPR CEQA Update Team,

The CPUC's Infrastructure Permitting and CEQA unit in Energy Division is generally supportive of the proposal to create a link between CEQA Guidelines Appendix F and Appendix G and to update CEQA Guidelines Section 15126.2. The proposed additions should help ensure that Appendix F is more frequently addressed in EIRs as required by CEQA.

Our team would be happy to meet with you to further discuss the wording of the proposed energy updates. Proposed Appendix G item "a," for example, might be improved by clarifying that wasteful, inefficient, or unnecessary consumption of energy when derived from nonrenewable resources would likely be more harmful than the unnecessary consumption of energy from renewable resources (e.g., solar). This is just a suggestion. It's a complex topic and difficult to predict how the proposed energy checklist items may be applied to various types of projects in practice.