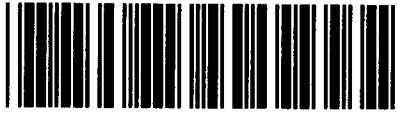




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**PUC DOCKET NO. 34577**

**PROCEEDING TO ESTABLISH  
POLICY RELATING TO EXCESS  
DEVELOPMENT IN COMPETITIVE  
RENEWABLE ENERGY ZONES**

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**BEFORE THE  
PUBLIC UTILITY COMMISSION  
OF TEXAS**

**COMMENTS OF PUBLIC CITIZEN OF TEXAS, TEXAS IMPACT, ENVIRONMENT  
TEXAS AND THE SUSTAINABLE ENERGY AND ECONOMIC DEVELOPMENT  
(SEED) COALITION**

Public Citizen of Texas, Texas Impact, Environment Texas, and the Sustainable Energy and Economic Development (SEED) Coalition (collectively "Public Citizen et al") provide these comments in the above-styled proceeding regarding management of renewable energy resources associated with Competitive Renewable Energy Zones (CREZ). The characteristics of new energy technologies, such as wind and solar, are different from those of resources Texas has relied upon in the past and will predictably lead to growing pains for the state's infrastructure and operating procedures that were designed for conventional power plants. As the commission deals with this important topic, it should strive for an ultimate solution that contributes constructively toward achievement of the diversified, low-carbon electric system that Texas will need to prosper in the 21<sup>st</sup> century.

We reserve comment at this time regarding any specific approaches for dispatch priority, however, we do stress, whatever solution the commission ultimately adopts, that it:

1. promotes realization of a cleaner, low-carbon, and operationally more flexible electric system;
2. not limit – as a long-term solution, if at all – the physical connection of any new clean generation capacity that wants to invest in Texas; and
3. not disadvantage operation of new renewable energy technologies, such as wind and solar, relative to conventional power plants, as the cleanest and lowest cost electric resources should be encouraged to run as much as possible.

Electric infrastructure and operating procedures will play an increasingly important role in meeting future environmental goals, reducing carbon emissions, and enabling electrification of the transportation sector. It is essential that Texas continue to expand its transmission infrastructure to serve new renewable energy capacity and continually update its operating procedures to meet the needs of the future.

Texas leads the nation in carbon emissions from electricity production. An integral aspect of developing a low-carbon grid will be the ability to incorporate and adapt to technologies on the horizon, as well as the big changes likely coming from the federal government.

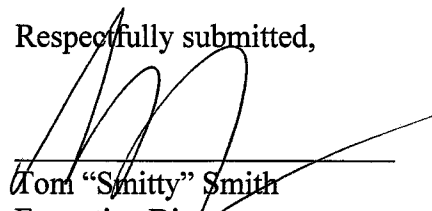
Dispatch priority needs to envision and be prepared to integrate technologies of the very near future, including concentrated solar in the CREZ, distributed generation (e.g., rooftop photovoltaics, small wind turbines), electric vehicle charging, and storage at utility, commercial and residential scales.

The nodal market, by its very nature, will determine winners and losers in the future electric market. Primary among the losers will be anyone living in urban areas, as the nodal system will result in more smokestacks and more pollution nearer to Texas cities.

In 2005 the Texas legislature recognized that Texas had a booming new energy industry ready to be harnessed to provide lower cost energy. They had the wisdom, vision and foresight to ask this commission to develop a grid ready to utilize the state's renewable resources. Now it is the commission's turn to fully implement the vision.

We look forward to working with the commission and stakeholders in crafting a solution.

Respectfully submitted,

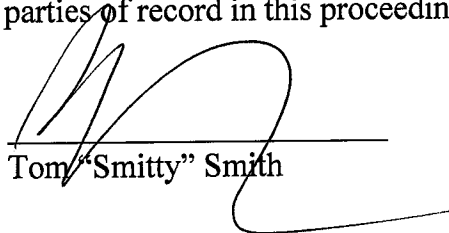


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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion to Intervene was sent via email, on this 29th day of September, 2008, to all parties of record in this proceeding.



Tom "Smitty" Smith