



California Wind Energy Association

November 16, 2015

California Energy Commission
Docket Unit, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

RE: Docket No. 15-RETI-02 -- Comments of the California Wind Energy Association following the November 2, 2015, Joint Agency Workshop on California Renewable Energy Transmission Initiative 2.0 (“RETI 2.0”)

A. INTRODUCTION

The California Wind Energy Association (CalWEA) was unfortunately unable to attend the November 2 workshop on the RETI 2.0 Organizational Structure and Work Plan. However, we listened to the WebEx recording and offer our thoughts in response, which complement our more detailed initial September 24, 2015, comments on the subject.

B. COMMENTS

1. The Goals of RETI 2.0 Are Still Unclear; Specificity Is Needed Regarding Fit with Ongoing Regulatory Processes

CalWEA joins the Large-scale Solar Association and the Independent Energy Producers in calling, at the workshop, for greater clarity with regard to how RETI 2.0 will fit into, and affect, existing proceedings. The RETI 2.0 Work Plan presentation and associated workshop provided very little clarity on how RETI 2.0 will relate to regulatory processes, and the goals of the initiative remain ambiguous. For example, some parties appear to be viewing RETI 2.0 as a venue for determining where renewable energy will be encouraged and/or discouraged (if not prohibited) across the state and even across the West. Some commissioner statements seem to feed such a view, while other statements do not. For example, President Picker stated at the workshop that “[We should] repeat very often the limits here. This is not a procurement proceeding; that’s something we have to do in our regulatory processes ... It is not a siting process; it is clearly not capable of doing that...” (WebEx recording at 1:29).

One thing that was made clear in the Work Plan presentation is that RETI 2.0 “is a non-regulatory planning process.” And yet it is intended to “inform future planning and regulatory

proceedings.” But if RETI 2.0 is not a regulatory process, not a procurement proceeding and not a siting process, how can it be expected to result in any meaningful decisions or even guidance – or even to influence the scope of regulatory proceedings (as suggested by Chair Weisenmiller and President Picker) with any assurance of due process? The purpose of formal regulatory processes is to ensure adequate opportunity for public participation and decisions that are based on a robust evidentiary record. If RETI 2.0 is intended to produce actionable results, it should be done through a formal proceeding. If the process remains informal, it should steer clear of any questions being addressed in ongoing proceedings. These issues require clarification.

More specifically, for example, after the workshop, a RETI 2.0 notice was issued for an Environmental and Land Use Technical Group that will “explore the available statewide environmental data and discuss various approaches to using the data to assess and compare areas for potential renewable energy generation.” Meanwhile, the CPUC’s Energy Division has already commissioned detailed resource and land-use information to inform the renewable energy scenarios to be developed to feed system and transmission planning processes (LTPP/TPP), and parties to the CPUC’s RPS proceeding have already filed comments on the subject. Is the RETI Environmental and Land Use Technical Group expected to affect that ongoing process? If so, how, and will it affect the schedule of the current process (and thus potentially slow down progress in identifying needed backbone transmission upgrades)?

We note that, even the DRECP, a formal agency effort that has so far taken eight years, has not been able to properly evaluate the compatibility of wind energy in specific locations as would be done in a project-specific review under CEQA and NEPA. The result of the broad-brush DRECP effort so far has been to eliminate 80% of the high-quality wind resources on the BLM’s vast lands in Southern California.¹ California cannot afford such broad-brush determinations again if it is to meet its greenhouse gas goals while maintaining reasonable utility bills.

2. Ongoing Regulatory Processes Can Be Expected to Achieve Many of the Goals Being Discussed in RETI 2.0

a. In-state transmission planning (in view of land-use sensitivities)

As discussed in our September 24, 2015, comments on this process, significant progress has been made in aligning CEC, CPUC and CAISO processes to effectively create an “integrated” system/transmission planning process. These ongoing regulatory proceedings are likely to lead to decisions to invest in needed backbone transmission upgrades in California in the CAISO’s Transmission Planning Process cycle no later than the 2017-18 TPP cycle and/or flexible capacity in the CPUC’s 2016 or 2018 LTPP.

¹ See AWEA-CalWEA commentary on BLM’s Phase 1 DRECP plan: [New Federal Rules for Calif. Desert Put Too Many Prime Wind Energy Sites Off-Limits](#).

The backbone upgrades that are likely to be needed (for reliability, economic and/or policy reasons) are unlikely to generate the kind of controversy surrounding the predecessor to the Sunrise Powerlink, which was referenced at the workshop. The likely upgrades have already been identified in the conceptual plan developed under RETI (1.0), in the DRECP conceptual transmission plan, and in a recent WECC reliability study. The primary upgrades needed are on WECC Path 15 and WECC Path 26 (both in CA), paths that already have transmission corridors for new development. As noted at the workshop by the CAISO's Neil Millar, these upgrades will be needed to deliver either or both in-state and out-of-state resources to California load centers.

These backbone upgrades will be indifferent to most any pattern of renewable energy development. As noted above, the CPUC is in the process of developing a range of possible RPS portfolios that will ensure that the CAISO's TPP will produce such upgrades. Therefore, at least for transmission planning purposes for the CAISO footprint, it seems unnecessary for RETI 2.0 to "consider resource potential and environmental and land use information to assist with identifying lower conflict areas for potential renewable energy development" (as stated in Slide 10 of the November 2 Work Plan).

The agency alignment that will lead to the CAISO identifying transmission upgrades in the 2016-17 and/or 2017-18 TPP cycle is very likely to reduce the timeline for permitting the identified infrastructure in the CPUC's CEQA process. We are concerned that RETI 2.0 may slow down the efficient process that has been painstakingly put together by the three agencies through a well-vetted stakeholder process. We are also concerned that addressing the same issues in both regulatory processes and in the non-regulatory RETI 2.0 process will be a burden on stakeholders, whose resource constraints may make it impossible to cover all the necessary forums.

b. Regional transmission

Transmission planning for areas outside of the CAISO's footprint are being addressed in the Order 1000 WestConnect effort. However, the most fruitful avenue for accessing regional renewable resources for the purpose of diversifying California's renewable energy mix -- not for the sake of diversity per se, but to obtain the associated economic benefits -- is the proposed integration of the CAISO and PacifiCorp (and beyond) balancing areas. This is because the expanded ISO, using its very efficient processes, will untap a lot of capacity in existing transmission resources within its expanded footprint and, using its authority and cost recovery mechanism, can identify the most suitable transmission upgrades to be developed through the ISO's transmission planning process.

3. Scoping RETI 2.0 Efficiently and Narrowly

As indicated by Chair Weisenmiller and President Picker at the workshop, the scope of RETI 2.0 needs to be carefully crafted so that its goals (once defined) can be accomplished efficiently. As RETI is a non-regulatory forum, it should be carefully scoped to avoid the subject matter being addressed in

ongoing or anticipated jurisdictional proceedings, both to assure due process and to conserve agency and stakeholder resources. Expanding on the list in our initial comments, useful tasks for RETI 2.0 might include serving as an inter-agency forum for:

- identifying, with jurisdictional agencies and relevant counties, fruitful areas for future land-use planning areas;
- developing a shared understanding of relevant ongoing activities in current and planned regulatory forums and discussing their inter-relationships;
- ensuring that California agencies are acting in accordance with the intended alignment of their processes such that, for example, the CAISO's adopted transmission upgrades can be expeditiously processed at the CPUC;
- considering how California's current LTPP and TPP processes and practices should relate to the processes of other states in CAISO's expanded regional market; and/or
- discussing California's role and objectives in Western transmission planning processes, such as the WestConnect FERC Order 1000 process (which would benefit from greater participation in RETI 2.0 by California's publicly owned utilities).

6. CONCLUSION

CalWEA looks forward to the agencies' careful articulation of the goals of RETI 2.0 and the development of an efficient process for addressing those goals that does not interfere with ongoing proceedings that are already focused on California's critically important clean energy goals.

Sincerely,

/s/

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/s/

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