

DOCKETED

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PacifiCorp Comments on RETI 2.0

Additional submitted attachment is included below.



Via energy.ca.gov

September 24, 2015

Robert B. Weisenmiller
Chair
California Energy Commission
1516 Ninth Street, MS-33
Sacramento, CA 95814

Re: Docket # 15-RETI-02 - RETI 2.0 Initial Stakeholder Comments

Dear Mr. Weisenmiller:

PacifiCorp appreciates the opportunity to comment on, and looks forward to participating in, the RETI 2.0 process. PacifiCorp supports efforts to determine least cost, best fit solutions to environmental and system concerns. PacifiCorp's parent company, Berkshire Hathaway Energy, has invested more than \$15 billion in renewable energy generation under construction and in operation through 2014. Berkshire Hathaway Energy has also committed to the American Business Act on Climate Pledge. PacifiCorp, as a utility operating in six western states, including California, recognizes the need for regional participation in the RETI 2.0 process. Accordingly, PacifiCorp supports the proposal to reach out to other states through CREPC and other means.

While the RETI 2.0 process is fundamentally a California initiative, California cannot address these issues in a vacuum. Greenhouse gas compliance solutions may require interstate coordination, as does proper system planning. While RETI 2.0 cannot plan for the entire Western Interconnection, outputs from RETI 2.0 can only succeed if stakeholders recognize larger regional issues and concerns, which may necessitate regional solutions for renewables procurement as well as transmission infrastructure. This includes other states and balancing authorities outside the ISO, both within California and outside the state. Without this coordination, the quality data necessary for the RETI 2.0 analyses will not be available. Proper coordination is also critically important given the development of the Energy Imbalance Market and efforts to explore expansion of the ISO's full market outside California. This, of course, leads to governance concerns, but those concerns are in no way insurmountable. Likewise, federal policy and the role of federal agencies must also be acknowledged early in the process.

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Any plan to reduce greenhouse gas emissions will need to look at all options in a nuanced manner to both define goals and develop a plan to meet those goals. Any goals of the RETI 2.0 process will not only have to address the environmental impact, but also look at affordability and reliability to provide an opportunity for success. Backbone transmission development will be critical for system planning to address the need to both imports and exports of renewable generation, to ensure reliability and long-term success.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Patrick Reiten". The signature is fluid and cursive, with the first name "R. Patrick" and last name "Reiten" clearly distinguishable.

R. Patrick Reiten
President and CEO, PacifiCorp Transmission
PacifiCorp
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