

DOCKETED

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LSA Comments on RETI 2.0

Additional submitted attachment is included below.



September 24, 2015

Submitted online

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

Re: Docket # 15-RETI-02, Renewable Energy Transmission Initiative 2.0

The Large-scale Solar Association (“LSA”) appreciates the opportunity to participate and engage in the Renewable Energy Transmission Initiative 2.0 (“RETI 2.0”). This initiative will provide an important avenue to plan for higher penetrations of renewables, including the new 50% RPS target that will be critical to meeting the California’s long-term climate goals.

LSA was pleased that during the RETI 2.0 workshop, several commissioners and stakeholders highlighted California’s significant progress since the first RETI in both bringing renewables online and planning for and siting renewable energy projects. Much was learned during that process and since then, and LSA encourages the Energy Commission and Public Utilities Commission (“CPUC”) in scoping RETI 2.0 to focus on identifying the gaps and areas of weakness in current processes and addressing them through this effort. Critical to this next phase will be figuring out how to gain efficiencies in those processes and to build on what we have without duplicating efforts already underway. In addition, commercial development and financing needs will be important factors to take into account, as these processes are refined. To that end, LSA recommends the agencies consider incorporating the following issues in the scope of RETI 2.0:

- Planning for both mid and long-term needs including considering where new lines can be built and have capacity for future expansion through smart design and siting. This include evaluating how developer driven transmission investment can be harnessed for the benefit of the overall grid as well as opportunities to develop new, joint trunk lines to open up new areas.
- Ensuring that future transmission planning accounts for and will enable the use of renewables to provide reliability services. This will require careful consideration of where and what level of energy-only projects makes sense and where planning full deliverability capacity will be necessary to ensure grid reliability as the penetration of renewables increases.

- Incorporate the regional expansion of the California ISO and how this may impact California's transmission needs and potentially how transmission is developed and funded.
- Account and plan for both potential changes in demand and transmission needs of energy storage projects, as well as ways in which addition of energy storage could reduce the need for new transmission by relieving congestion
- Evaluate how existing transmission can be optimized, including by improving access to information on existing and approved transmission upgrades where available capacity still exists.

LSA also recommends that the agencies also consider incorporating the following goals for RETI 2.0:

- Shorten the time it takes to identify and develop new transmission. A more nimble system will help align project siting with transmission siting and the procurement process and enable better response to changing needs.
- Improve alignment between the CPCN process with the goals and needs identified in transmission planning efforts.
- Maintain an open and transparent but streamlined process for the initiative that facilitates stakeholder and agency dialogue.
- Continue close coordination and collaboration between agencies and their related ongoing efforts including the RPS Calculator and the CPUC and California ISO's Transmission Planning Process and related studies.
- Send better market signals on the pathways and process for identifying and prioritizing new transmission. This is key for attracting investment and ensuring the renewables industry can continue to meet help California meet its renewable energy and climate goals.

LSA appreciates the opportunity to provide feedback on RETI 2.0 and looks forward to participating in this effort.

Sincerely,

/s/ Rachel Gold

Rachel Gold

Policy Director

Large-scale Solar Association