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Additional submitted attachment is included below.

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California Energy Commission
Dockets Office, MS-4
Re: Docket No.15-IEPR-08
1516 Ninth Street
Sacramento, CA 95814-5512
Via e-Comment

Re: Duke American Transmission Company's Comments on the Joint Agency Workshop to Introduce the Renewable Energy Transmission Initiative 2.0

Dear Commissioners,

Duke American Transmission Company ("DATC") appreciates the opportunity to provide these comments as follow-up to the September 10, 2015, joint agency workshop to introduce the Renewable Energy Transmission Initiative 2.0 ("RETI 2.0").

DATC and its parent entities, including Duke Energy and American Transmission Company, have considerable experience developing, owning and operating major transmission facilities across the country. In California, DATC owns the majority of the transmission service rights for the critical Path 15 Upgrade Project portion of the California Independent System Operator ("CAISO") controlled transmission grid. DATC is also developing the Zephyr Power Transmission Project, which will meet regional needs including bringing highly reliable and low-cost wind power from Wyoming to California. Presently, DATC is working with the Western Area Power Administration ("Western") to develop the San Luis Transmission Project ("SLTP"), a 62-mile transmission project to be located between the Tracy East and Los Banos Substations. SLTP will serve federal water pumping needs and, if "right-sized", will make transmission available for renewable development in the San Joaquin Valley. Such development is necessary both to meet the state's renewable energy and climate change goals, as well as to stimulate the economy in this currently struggling region of the state.

With the recent changes to the state's renewable energy and greenhouse gas goals, DATC agrees that it is time for a new RETI process led jointly by the California Energy Commission ("Commission") and the California Public Utilities Commission ("CPUC"), collectively the "Joint Agencies". DATC especially supports a longer-term approach to transmission planning that utilizes enhanced agency coordination.

DATC is participating in RETI 2.0 to provide our expertise on the relative potential associated with various renewable locations in California, to emphasize the realities of the timeframes for planning, permitting and constructing transmission facilities, and to encourage an outcome of this process that ensures the necessary transmission plan is in place to enable California to achieve its important and ambitious renewable energy and greenhouse gas reduction goals.

I. California's Transmission Planning Challenges

1. Past Transmission Planning and Permitting Efforts have Greatly Aided California's Successful Achievement of a 33% Renewable Goal.

The Joint Agencies—and all of the government and private entities involved in electricity and transmission planning in California—have done a remarkable job in setting up the state to achieve the state's 33% renewable penetration by 2020 target on schedule. DATC commends all involved for solving the myriad of challenges inherent in fundamentally transforming a complex network of physical infrastructure, contracts, permits, regulations and processes to achieving this goal.

This historic achievement could not have been accomplished without visionary transmission planning and permitting. That effort has enabled projects, such as the Tehachapi Renewable Transmission Project and Sunrise Powerlink, to overcome significant controversy and permitting challenges. Today these two facilities are fully subscribed and delivering over 5,500 megawatts of renewable energy to California consumers every day.

Overall, the state's success in reaching the 33% target involved the approval and construction of at least 20 major transmission projects documented by the Commission.[1] The majority of these projects (such as the Tehachapi Project, the Sunrise Powerlink and the Colorado River-Valley and West of Devers Projects), are necessary for the delivery of 58 percent of all the incremental renewables needed to meet the 33% target, and were part of long-term (greater than 10-year) multi-agency planning processes.

DATC believes that the Joint Agencies can build on these past successes by expanding the scope of RETI 2.0, as discussed below. With a few improvements, the outcome of RETI 2.0 can ensure that California's more aggressive renewable and greenhouse gas goals can be achieved.

[1] California Energy Commission. Tracking Progress: Transmission Expansion Projects for Renewables, June 24, 2015, available at: http://www.energy.ca.gov/renewables/tracking_progress/documents/transmission_expansion_projects.pdf

2. Significant New Transmission Facilities are Necessary to Achieve California's 50% Renewable Goal and the State's Greenhouse Gas Goals.

The Governor's inauguration statement and recently passed Senate Bill 350 are raising the state's renewables penetration goal from 33% to 50% by 2030. Moreover, Governor Brown's executive order B-30-15, calling for a 40% reduction in the state's carbon footprint compared to 1990 levels by 2030—and even greater reductions by 2050—effectively means that the 50% renewable penetration goal is a floor not a ceiling.

It is expected that California will have to go beyond a 50% renewable goal in order to meet these carbon reduction targets. At a minimum, it is apparent that meeting the 2030 GHG reduction target of 25 to 36 percent below 1990 levels requires significant continued renewable energy development well beyond the 33% RPS goal considered by the CAISO's 2014-2015 transmission planning assumptions. As reported by E3 in *California GHG Scenarios & Policy Framework Work Product for California Energy Agencies*, a report commissioned to determine an achievable 2030 GHG reduction target, E3 concluded that 56 to 76 gigawatts ("GW") of renewable capacity from utility-scale facilities and installation of rooftop photovoltaic systems will be needed.[2]

California will have to meet this increased target without much of the "low hanging fruit" that has been used to meet the 33% target. To reach a 50% renewable goal by 2030, California will need to redouble its efforts and potentially develop an even greater amount of new transmission. Just as was necessary to meet the 33% target, much of this new transmission will demand long-term, multi-agency planning that looks beyond the 10 year horizon of the CAISO transmission planning process.

While 2030 may seem distant for some, for transmission planners it is rapidly approaching. Planning, permitting, financing and constructing significant transmission projects in California can easily take ten years or longer. If California is to have the transmission in place to meet its carbon reduction goals—which must include very significant electrification of transportation on top of the renewable energy demand—it needs to engage in coordinated, multi-agency, long-term planning starting now. Through participation in RETI 2.0 and other transmission planning efforts, DATC seeks to support that effort.

3. Improvements in Planning Process are Necessary to Ensure that Facilities Can Be Timely Built.

As noted above, the process of planning, permitting, and constructing a transmission project is a long and complex process. The Sunrise Powerlink took nearly 6 years from its initial CPUC permit application in August, 2006 to its first being energized in June 2012—and there

[2] E3, California GHG Scenarios & Policy Framework, E3 Work Product for California Energy Agencies Final Results, Slide 47 (Dec. 30, 2014).

were years of planning and preparation of the application before then. The Tehachapi Renewable Transmission Project took even longer. Initial planning for Tehachapi began over 15 years ago, and the initial phase CPUC permit application was filed in the Fall of 2004; the full project is not expected to be completed until late 2016. Another example is the SLTP, which federal sponsors have already been developing for more than 4 years and which is expected to come on line in 2023.

It is therefore evident that transmission planning, including RETI 2.0, should look for ways to speed up the initial phase of planning for transmission projects that will accommodate the state's increased need for renewable generation. SB 350 revises the quantity of renewable electricity products to be procured by retail sellers for each compliance period in order to meet the 50% target by 2030, setting a 40 percent renewable procurement by December 31, 2024, 45 percent by December 31, 2027.[3] A speedier planning process is important to not only meet the 2030 renewable target, but to ensure that California is on pace to get there.

In addition, however, RETI 2.0 should plan for projects in a manner that allows substantial planning and permitting time consistent with historic experience. That means that planning for projects that may not be needed until 2030 or later should take place now rather than deferring consideration of them until the need is within the CAISO's current 10 years planning horizon.

4. Adequate Transmission Planning Plays an Important Role in Reducing the Uncertainty and Costs, and Increasing the Benefits, of Serving Californian's Electricity Demands and Meeting Our Renewable and GHG Reduction Goals.

The RETI 2.0 process should explicitly recognize that prudent planning means ensuring that the grid is capable of responding to a myriad of potential scenarios that California could face over the next two decades. Planning for California's future electric needs must consider the cumulative and interactive effects of all of the following tectonic changes in California's electricity supply and demand picture. At a minimum, these conditions include:

- The closing of the San Onofre Nuclear Generating Station;
- The potential closing of the Diablo Canyon Nuclear Generating Station;
- The effort to reduce GHG emissions and achieve an unprecedented increase in the penetration of renewable generation and the possibility that either of these targets will be raised or exceeded;
- The closing or repowering of many California power plants that rely upon once-through cooling pursuant to the State Water Resources Control Board's ban on such systems;

[3] SB 350 at 399.15(b)(2)(B).

- The efforts of air agencies and auto manufacturers to replace gasoline with electricity as the state's principal transportation fuel and uncertainties regarding the amount of electricity needed for and the timing of recharging such vehicles;
- The state's efforts to encourage electricity storage as a means to reduce peak demand and further ease the integration of intermittent renewables, and the potential technical and market success of large-scale electricity storage technologies;
- The state's efforts to encourage distributed "behind the meter" generation; and
- The impacts of climate change and drought on electric supply and demand.

Any of these changes alone is significant and would introduce uncertainty into a transmission planning effort. That all of them could be happening at once means that transmission planning based on any *one* scenario or assumed future is imprudent. As such, it is incumbent upon the Joint Agencies, with the valued input from CAISO, to develop a transmission plan that is flexible enough to accommodate a reasonable range of California electricity futures.

II. Specific Improvements to the Transmission Process that Should be Incorporated and Supported in RETI 2.0

1. Further Coordination Between Energy Agencies is Needed.

As the Joint Agencies are aware, the transmission planning, permitting and construction process involves a list of state and local agencies. While California's state agencies intend to, and often do, implement consistent policies and harmonious procedures, there remains room for closer coordination, particularly between the Joint Agencies, the California Air Resources Board ("ARB"), and CAISO. As pointed out by Southern California Edison Company (SCE) in a recent presentation to the Governor's San Joaquin Valley Solar Convening, there are several existing problems in the inter-agency process that RETI 2.0 can help resolve:

- *Generation Interconnection Process*
  - *Least cost minimum capacity upgrades are often substituted for scalable least regrets upgrades in order to reduce cost allocations to generation developers*
  - *Transmission sponsors pursuing scalable least regrets upgrades instead of least cost upgrades would incur the initial cost difference and could jeopardize their CAISO approval during the permitting process*
- *CAISO Transmission Planning Process (TPP)*
  - *RPS Calculator produced Portfolios used in CAISO TPP may not correlate with RETI, DRECP, & Generation Queue info*
    - ✓ *New RPS Calculator Version 6.1 starts to address some of these concerns*

- *A ten year planning window doesn't always support scalable least regrets upgrades*
  - ✓ *Double-circuit single strung vs. single circuit*
  - ✓ *500 kV construction with initial 220 kV operation instead of 220 kV construction and operation*

- *Transmission Required to meet 33% RPS in 2020 (Theory vs. Practice)*
  - *Some previous/current CAISO approved projects incorporating scalable least regrets upgrades have failed or are at risk in the Permitting Process due to:*
    - ✓ *Lack of robust science based environmental information at the time (i.e., DRECP)*
    - ✓ *Changes to existing system conditions*
    - ✓ *Preference to downsize to only meet today's needs instead of tomorrow's needs*

- *Transmission Policy Study Efforts (RETI 1.0, SJS Transmission Effort, etc.)*
  - *Mechanism to feed study effort results into the current Planning, Permitting, & Procurement processes to produce actual transmission facilities may be insufficient today*[4]

The Joint Agencies have taken a necessary first step in this process by inviting CAISO to participate in RETI 2.0, and DATC encourages the Joint Agencies to also invite input from the ARB to ensure that the role of transmission planning in the development of an electric system that can meet the state's greenhouse gas goals is taken adequately into account.

RETI 2.0 should also coordinate closely with the San Joaquin Solar Convening effort that is being facilitated by the Governor's Office.[5] The Convening is focused on addressing new solar development in the Southern San Joaquin Valley and the infrastructure necessary to support this development. Renewable projects under development in the Central Valley, such as the series of phased projects comprising Westlands Solar Park, will require additional transmission capacity. Moreover, a recent report entitled "Unlocking Renewables: Exploring the Clean Energy Potential in the San Joaquin Valley" documented the vast renewable energy potential of the San Joaquin Valley and the need for transmission to unlock this potential resource for the state.[6] Under this view of the San Joaquin Valley, planning the appropriate amount of transmission capacity is necessary to serve the potential renewable build-out. The conclusions of RETI 2.0 should take this into account and be consistent with the Convening.

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[4] *San Joaquin Solar (SJS) Transmission Group NEXT Steps;* Southern California Edison; August 28. 2015 at p. 5.

[5] The Governor's Office Convening is demonstrating the value of land-scape level planning to identify areas for renewable energy development that are in areas of "least-conflict" with regards to a cross-section of local and regional stakeholders. Databasin is the GIS tool that is proving to be valuable for this effort to better identify least conflict lands for renewable energy and transmission development. See www.databasin.org.

[6] Unlocking Renewables report, *available at*: www.RenewablesInTheValley.org (Aug. 12, 2015).

As pointed out by SCE, above, the generation scenarios resulting from the CPUC's procurement planning proceeding have not always correlated with other state planning process assumptions. One reason is that these scenarios are developed by the CPUC mainly to meet procurement goals and only secondarily for transmission planning. In DATC view, there is a false consistency in using the same scenarios for both because there is a fundamental difference between procurement and transmission planning. Developing one or a limited number of aspirational scenarios is a reasonable approach to energy procurement, which seeks to incent the most desired mix of resources without significant hedging for uncertainty. But such "hope for the best" procurement planning should be combined with "plan for the worst" transmission planning that does hedge against uncertainty by using a broader range of scenarios. Given the very long-term nature of transmission planning, a prudent transmission plan should be resilient enough to accommodate change in procurement and to meet a reasonable range of future generation scenarios.

That is the case because: 1) transmission expenses comprise less than 10% of total electric rates but lack of transmission can significantly drive up the remaining 90% of the bill; and 2) the costs and risks of planning for too much transmission are far less than the cost and risks of planning for too little. Moreover, planning for too much transmission can be quickly and inexpensively remedied by deferring or even cancelling projects; planning for too little, on the other hand, has no timely or inexpensive remedy. Moreover, planning for too little has the very real potential of exacerbating the rate and reliability impacts of significant increases in variable generation.

Thus, the scenarios that the CPUC hopes to achieve through procurement today should not be the only scenarios used in the transmission planning process.

2. The Planning Process Should Look Further Than Ten Years Ahead.

Unlike other major transmission planning entities that use longer planning horizons (e.g., the PJM Interconnection and the Midcontinent Independent System Operator),[7] the CAISO

[7] For example, the PJM Regional Transmission Expansion Planning (RTEP) process employs a 15-year planning horizon. PJM 2015 RTEP Process Scope and Input Assumptions White Paper, Aug. 7, 2015, available at: http://www.pjm.com/~/media/documents/reports/2015-rtep-process-scope-and-input-assumptions.ashx; *see also,* PJM Interconnection: Regional Transmission Expansion Plan, http://www.pjm.com/planning.aspx. Under this timeframe, projects that have been evaluated include the 500 kV Trans-Allegheny Interstate Line [Market Efficiency Analysis of 502 Junction-Meadowbrook-Loudoun 500 kV Line, p. 6-12, https://www.pjm.com/~/media/committees-groups/committees/teac/20070509/20070509-market-efficiency-update.ashx (analyses based on years 2006/2007 through 2021/2022)]; the 500kV Carson-Suffolk line [See, PJM RTEP fact sheet, https://www.pjm.com/~/media/documents/reports/2009-rtep/2009-section1.ashx (acknowledging a 15-year planning horizon under which the Carson-Suffolk line was analyzed)]; and the 500 kV Susquehanna-Roseland line [Pennsylvania Public Utility Commission, Recommended Decision of ALJ Susan D. Colwell in, among other proceedings, docket A-2009-2082652, Paragraph 67 ("…PJM chose the Susquehanna-Roseland Project because it had the greatest positive impact on [] line loadings throughout the 15-year planning horizon." (citing PPL Electric Stmt. 7 at 33))].

currently utilizes a 10-year timeframe for its transmission planning that meets the North American Reliability Corporation's ("NERC") ten-year reliability forecast requirement. While this may be appropriate for assessing minimum near-term reliability needs, it is not sufficient for the much broader purposes of RETI 2.0. The Joint Agencies should use a longer-term planning horizon of at least 20 years, if not longer. This is wise for many reasons, including the fact that a transmission project can take more than ten years from proposal to operation, as discussed above. It is also appropriate because RETI 2.0 will seek to ensure achievement of renewable and GHG reduction goals that extend to 2030 and even to 2050. RETI 2.0 can only effectively plan to meet California's future energy needs by looking at much longer planning horizons that what is currently performed in the CAISO's TPP. While there is no crystal ball no matter the time horizon (i.e. 10 years or 20 years), there is still great value in portending what future generation and transmission resources could be planned in an integrated manner under a number of technology scenarios.

3. The Planning Process Should Fully Enforce the Garamendi Principles and Encourage "Right-Sizing" of Projects in Existing Corridors

A forecast of more than ten years should also be used for the evaluation of "right-sizing" opportunities that will not be available in future planning cycles. "Right-sizing" suggests that agencies should plan for an increase in the needed capacity of transmission projects beyond current system needs to accommodate longer-term electric demand growth and/or the connection of new generation development in the future. The Commission has previously considered the benefits of right-sizing and supported the policy in the 2011 IEPR and the 2014 IEPR update.[8]

MISO's Transmission Expansion Plan ("MTEP") employs a 20-year planning horizon. MISO Transmission Planning BPM, BPM-020-r11 at p. 51. Projects that have been evaluated by MISO within the last few years under this timeframe include: the 345 kV Montgomery – T-Hills line [MTEP 2014 Overview, p. 12, available at: https://www.misoenergy.org/Library/Repository/Meeting%20Material/Stakeholder/BOD/System%20Planning%20Committee/2014/20140826/20140826%20System%20Planning%20Committee%20of%20the%20BOD%20Item%2004%20MTEP14%20Overview.pdf]; the 500 kV "Great Northern Transmission Line" [MTEP 2014 Overview, p. 8]; and the 115 kV Franklin-McComb line [MTEP 2014 Overview, p. 12].

[8] California Energy Commission. 2011. 2011 Integrated Energy Policy Report. Publication Number: CEC-100-2011-001-CMF, p. 38 ("Allowing projects to be upsized beyond what is needed could provide unused capacity for future use, maximizing the value of land associated with already necessary transmission investment and avoiding future costlier upgrades to accommodate additional renewable development."); California Energy Commission. 2015. 2014 Draft Integrated Energy Policy Report Update. Publication Number: CEC-100-2014-001-CMF, pp.153-154 ("Upsizing could maximize the value of land associated with already necessary transmission investment while avoiding future costlier upgrades to accommodate additional needed (for example, reliability, renewable, economic, public policy-driven) development.")

Right sizing is first and foremost a fundamental California transmission planning policy. The Garamendi Principles, which are the only specific transmission planning policies deemed important enough to be codified in statute,[9] support the right-sizing approach. As such, these right-sizing principles deserve to be given great weight by transmission planners at all levels.

As a practical matter, this means that any proposal at odds with right-sizing a transmission project should only be adopted after a thorough and conservative examination of the long-term environmental and economic consequences of such a decision. At a minimum, such analysis would logically include a careful review of the likely need for the foregone transmission capacity over the long-term and under a reasonable range of scenarios. Such an analysis would also logically include a close consideration of the environmental and economic

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[9] Garamendi Principles, SB 2431, Stats. 1988, Ch. 1457. The Garamendi Principles state, in pertinent part, as follows:

(a) The Legislature finds and declares that establishing a high-voltage electricity transmission system capable of facilitating bulk power transactions for both firm and nonfirm energy demand, accommodating the development of alternative power supplies within the state, ensuring access to regions outside the state having surplus power available, and reliably and efficiently supplying existing and projected load growth, are vital to the future economic and social well-being of California.

(b) The Legislature further finds and declares that the construction of new high-voltage transmission lines within new rights-of-way may impose financial hardships and adverse environmental impacts on the state and its residents, so that it is in the interests of the state, through existing licensing processes, to accomplish all of the following:

1. Encourage the use of existing rights-of-way by upgrading existing transmission facilities where technically and economically justifiable.

2. When construction of new transmission lines is required, encourage expansion of existing rights-of-way, when technically and economically feasible. (Emphasis added).

3. Provide for the creation of new rights-of-way when justified by environmental, technical, or economic reasons, as determined by the appropriate licensing agency.

The Garamendi Principles are frequently cited as a primary source of law governing permitting and siting of transmission lines for the CEC and the California Public Utilities Commission ("CPUC"). For instance, in a 2009 decision, the CPUC employed the Garamendi Principles to justify siting a transmission line through an existing corridor instead of creating an entirely new corridor. *Decision Granting a Certificate of Public Convenience and Necessity for the Tehachapi Renewable Transmission Project (Segments 4-11)*, D.09-12-044 at page 19.

consequences of a failure to right-size the project and having to add equivalent transmission capacity in the future. Where it is likely that capacity may be needed over the long-term, and the environmental and economic benefits of right-sizing are substantial if it is needed, then the Garamendi Principles support right-sizing even where the likely need is longer-term.

4. All the Benefits of Transmission Should Be Considered in RETI 2.0

Ensuring near term system reliability is plainly a key goal of any transmission planning effort. But it should not be the only goal. As noted above, minimizing transmission can increase the customer's total bill significantly or cause significant environmental impacts even if the lights remain on. Prudent transmission planning must seek to minimize long term costs and impacts as well as ensuring reliability. A good example of this is the need to plan for regional power sharing during periods of over generation. To accommodate the need to balance additional renewable energy in one location that could utilized in a greater region, a regional approach to transmission planning should be taken.

On this topic, DATC supports the position expressed by Carl Zichella, the director for western transmission for the Natural Resource Defense Counsel, in prior proceedings before this Commission and the CAISO. Mr. Zichella has previously espoused the importance of a more regional planning approach, noting "the value of geographic diversity in facilitating renewable energy integration cost effectively."[10] In Mr. Zichella's own words:

> It is critical to look at the grid in both a local and regional perspective. As we learned from the study, investigating a Higher Renewables Portfolio Standard in California, conducted by the consulting firm Energy and Environmental Economics, Inc. climate solutions focusing on a single state, California, inhibit our ability to cost-effectively integrate renewable energy sufficient to meet long term climate goals absent coordination among states; taking advantage of diverse geographies and technologies; and, gaining access to new markets and market tools. We believe planning should be realigned to emphasize longer term system and climate mitigation needs and goals, respectively.[11]

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[10] Many of Mr. Zichella's views on transmission planning have been succinctly summarized in a blog post available at: http://switchboard.nrdc.org/blogs/czichella/regional_coordination_and_mark.html?utm_source=feedburner&utm_medium=feed&utm_campaign=Feed%3A+switchboard_czichella+%28Switchboard%3A+Carl+Zichella%E2%80%99s+Blog%29.

[11] Comments from Natural Resources Defense Council on the CAISO 2015-2016 Transmission Plan, Mar. 12, 2015, available at https://www.caiso.com/planning/Pages/TransmissionPlanning/2015-2016TransmissionPlanningProcess.aspx.

It is therefore important to plan and size a system that can facilitate system needs both from a local, in-state perspective, and from a more regional, and inter-regional, multi-state perspective. CAISO has begun this effort with its deployment of an integrated market with PacifiCorp, and efforts to further expand the integrated market to more neighboring balancing authorities in the Western Interconnection. CAISO's Energy Imbalance Market ("EIM") uses technology to identify efficient resources over a larger geographical area. The EIM is projected to reduce electricity costs and enhance reliability by providing a larger pool of resources for system operators to use in managing the grid. This facilitates the use of electricity from renewable resources in one area of the West to shore up demand in a different area, thereby allowing excess green energy that may otherwise go unused to be consumed. It is obvious the development of a transmission system that is capable of taking advantage of regional, versus local or merely in-state, transmission of generation is needed from the RETI 2.0 process.

In consideration of the clear benefits of a regional approach, as astutely expressed by Mr. Zichella and as evidenced by CAISO's efforts to expand EIM participation, it is imperative that RETI 2.0 incorporate a regional approach to transmission planning.

III. Conclusion

Many of the points raised in these comments are ones that DATC has been advocating in California for some time and in a variety of forums including the CEC's IEPR, the CAISO transmission planning process and elsewhere. DATC is therefore encouraged by and strongly supportive of the RETI 2.0 effort as it represents the type of longer term, coordinated transmission planning critical to achieving California's ambitious electric system goals. DATC appreciates the Joint Agencies' consideration of these initial comments and looks forward to being an active participant in RETI 2.0.

Sincerely,

Christopher T. Ellison
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Attorneys for Duke American Transmission Company