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Comment Received From: Daniel Kim
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WSP comment on RETI 2.0 kick off meeting on Sept 14, 2015

Additional submitted attachment is included below.

September 24, 2015

TO: California Energy Commission Docket No. 15-RETI-02 on the September 10th Joint Agency Workshop to Introduce the Renewable Energy Transmission Initiative 2.0
RE: Comments from Westlands Solar Park ("WSP")

We are pleased to offer the following comments to the Joint Agency Workshop to Introduce the Renewable Energy Transmission Initiative 2.0 held on September 14th.

WSP is supportive of the creation of RETI 2.0 and commends the Governor and all the state and federal agencies for reinstituting this successful stakeholder process to enable California to meet its renewable energy and greenhouse gas reduction goals.

The timing of starting RETI 2.0, fifteen years before the 2030 target date for meeting the 50 percent RPS, is important due to the thorough planning process involving many and varied stakeholders, and the long lead-times needed for permitting and building transmission projects. We believe it is vital to make the necessary investments in new transmission in order to successfully develop the renewable energy zones and ensure transition of the state's energy grid to meet the 2030 goals.

WSP supports the goal of RETI 2.0 to build upon the success of RETI 1.0 and CTPG as it pertains to transmission planning for the renewable energy zones in the state. Specifically, we support the planning and development of the Foundation Lines identified in RETI 1.0 and the build out of the medium priority lines identified in the CTPG that will open up renewable resources in the San Joaquin Valley, and also create more south to north capacity on the transmission system and strengthen system reliability.

In RETI 1.0 the central valley Foundation Lines were deemed important to deliver renewable energy generated in southern California to load centers in northern California. This importance has since been heightened by the recognition that these Foundations Lines will be essential for balancing the grid during over-generation periods, particularly by facilitating both in state and out state delivery of renewable energy. We believe a regional system cannot be developed without building out the Foundation Lines in the central valley, and we encourage RETI 2.0 to consider this as one of the first priority items to address.

WSP also encourages RETI 2.0 to analyze how storage technology and balancing technologies and resources can and should be planned for in renewable energy zones, and how renewable zones can provide a key role in responding to the challenges from over generation and voltage and frequency stability. There are numerous engineering challenges to be solved in adding greater amounts of intermittent generation as California increases the RPS; however, through the success of the comprehensive planning process embodied in the RETI 2.0, the state

can overcome the challenges of over generation through the use of storage technology coupled with large scale renewable generation in CREZ's like the Westlands Solar Park.

Since the initiation of RETI 1.0 in 2007 much has changed in the renewable energy landscape in California. The state has seen the tremendous growth of distributed generation, which is now a mature industry. And for utility scale renewable generation the state currently has 21,000 megawatts of renewable capacity installed, which has been critical to achieving the 33 percent RPS goal, and costs have steadily decreased in these larger projects to levels that are comparable to fossil generation.

In the San Joaquin Valley, hundreds of megawatts of medium and large-scale solar energy projects have been built and interconnected by utilizing existing transmission capacity. As a result, most of the state's existing transmission is now operating at near capacity, and the forecasted amount of 15,000 megawatts or more to meet the 50 percent goal will require some new investment in transmission in California. Also, consistent with comments made by commissioners at the Sept 14th workshop that RETI 2.0 look first towards optimizing our existing transmission system to meet our renewable goals we propose adding that existing and planned transmission projects be re-analyzed to determine if they can be right sized and or future proofed to maximize their use of existing corridors.

In the RETI 1.0 process, areas like the San Joaquin Valley and the Westlands CREZ were considered too costly to develop for solar energy due to the slightly lower insolation compared to the desert. In the meantime, the price of solar photovoltaic modules has declined substantially, while solar technology has been steadily gaining in efficiency, thus dramatically enhancing the economic feasibility of solar generation in the San Joaquin Valley. Consequently, the solar industry now considers this region to be ideal for solar development as evidenced by the numerous solar generating facilities that have been constructed in the region in past five years, along with the numerous others that are currently in the planning and permitting stages. The RETI 2.0 process should not overlook the renewable generation opportunities that have emerged in the center of California as it analyzes the best path forward for the state to meet its renewable energy and greenhouse gas reduction goals.

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