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San Diego Gas and Electric Comments

Comments for 15-RETI-02.

Additional submitted attachment is included below.

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California Energy Commission
Dockets Office, MS-4
Docket No. 15-RETI-02
1516 Ninth Street
Sacramento, California 95814 -5512

RE: **Docket: 15-RETI-02.** SDG&E Comments on the September 10, 2015 Renewable Energy Transmission Initiative (RETI) 2.0 Kick-Off Meeting

The CEC, CPUC, CAISO and other state agencies convened a kick-off meeting for RETI 2.0 on September 10, 2015. The basic objectives of RETI 2.0 are to identify renewable resource portfolios, and associated transmission additions, that will support California's ability to meet Greenhouse Gas (GHG) reduction goals for year 2030. SDG&E appreciates the opportunity to submit these comments on the RETI 2.0 Initiative kick-off meeting.

Considerable effort has already been expended in developing the data and processes that support California's efforts to increase the amount of retail load supplied by renewable generation sources. The CPUC's RPS Calculator model—currently being upgraded—has the capability to develop Renewable Portfolio Standard (RPS) portfolios that meet higher RPS requirements under a variety of user-defined scenarios. The technical, economic and environmental data needed to populate the model inputs are readily available, although refinements are needed. The CAISO's annual Transmission Planning Process (TPP) provides a means of identifying transmission upgrades that support the CPUC-supplied RPS portfolios. Municipal utilities have undertaken their own efforts to meet California's existing 33% RPS requirement and load serving entities (LSEs) throughout California—both those regulated by the CPUC and municipal utilities—have already achieved, or are well on their way to meeting, this requirement.

SDG&E believes RETI 2.0 can be used to fill certain gaps in the data and processes that California currently uses to plan for renewable resources; but it is important that RETI 2.0 be carefully circumscribed to prevent duplication of, and conflict with, existing data and processes. To this end, SDG&E suggests RETI 2.0 follow the high level approach outlined below.

- RETI 2.0's end-product should be a set of RPS portfolios for year 2030 that correspond with a set of scenarios developed by the RETI 2.0 participants.

- All of the scenarios should be comprised of assumptions which result in meeting or exceeding (i) the GHG targets specified in California Governor Brown's April 29, 2015 executive order: GHG emissions in, or attributable to California will be 40 percent below 1990 levels by 2030, and (ii)

the renewable energy procurement target specified by Governor Brown in his January 5, 2015 inaugural address: a 50% RPS for California Load Serving Entities (LSEs) by 2030.

- For each scenario, the RPS portfolios would be largely determined by the RPS Calculator model using applicable scenario assumptions developed by the RETI 2.0 participants. The portfolios created by the RPS Calculator model would be subject to ex-post adjustment to the extent the RETI 2.0 participants determine the RPS Calculator model is incapable of capturing operational, economic or environmental attributes that are important to maximizing consumer benefits and minimizing adverse environmental impacts.

- The RPS Calculator model requires, as inputs, transmission expansion options and associated costs. The model evaluates these transmission options, along with the costs and economic benefits of renewable resource options, to identify the lowest cost RPS portfolios. Accordingly, the transmission expansion options that the model selects in developing the RPS portfolios would constitute the "RETI 2.0 transmission expansion plans." It should be noted that the transmission expansion *options* input into the RPS Calculator model are intended to be conceptual in nature but, in some cases are likely to draw upon information from currently-proposed transmission expansion projects. The "RETI 2.0 transmission expansion plans" would be implemented using existing regulatory approval and cost recovery processes.

- RETI 2.0 should undertake the following enhancements and refinements to the RPS Calculator model and its inputs:
    - Expand the RPS portfolio selection to include the renewable net short of California's non-IOUs, Direct Access suppliers and Community Choice Aggregators (CCAs).
    - Add the capability to associate different renewable technology mixes with the fixed costs of new flexible generation that would be required to accommodate that portfolio.
    - Implement environmental scoring for all (i) renewable resource options, and (ii) transmission expansion options that are at an equivalent level of detail for both in-state and out-of-state options.
    - Review assumptions concerning the availability of existing transmission throughout California, and the remainder of the WECC, to support the development of new renewable resources. This is important for placing in-state and out-of-state renewable resource options on a comparable level; in particular for estimating the capacity and/or energy benefits of different renewable resource options in different locations.
    - Review all of the renewable resource options and transmission expansion options included in the model to ensure the magnitude and costs are at a comparable level of detail across the entire WECC. This may, for example, lead to refinements in the size and performance characteristics of renewable resource options and associated transmission expansion options for the California "Super CREZs."

SDG&E appreciates your consideration of these comments.

Sincerely,

Tamara Rasberry