

DOCKETED

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Additional submitted attachment is included below.



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September 28, 2015

California Energy Commission
1516 Ninth Street
Sacramento CA 95814

Re: Docket No. 15-RETI-02
Renewable Energy Transmission Initiative 2.0

The California Municipal Utilities Association appreciates the opportunity to submit initial thoughts on the Renewable Energy Transmission Initiative (RETI 2.0), and the workshop held September 10, 2015.

While transmission siting and investment affect all Publically Owned Utilities (POUs), the study work that may be entailed will largely involve the larger POUs or Joint Powers Authorities that own major high-voltage transmission facilities. In that regard, we offer the following suggestions:

First, POUs certainly support comprehensive planning including examination of regional options to meet California's energy goals. While cognizant of the statutory requirements for Product Content Category 1 procurement, regional procurement has the ability to lower costs for California consumers as we strive to meet new renewable resource requirements.

Second, everyone would benefit from additional clarity on the purpose and objective of RETI 2.0. Especially those that may be expected to provide technical expertise or support, the failure to identify and agree on goal for the initiative will hinder its effectiveness. Along these lines, governance of the RETI 2.0 process is important and should be addressed early in the process. There is concern about replicating RETI 1.0 in terms of resources commitment from both a committee and study standpoint. This specification of effort should include how additional studies, if any, will be performed.

Third, RETI 2.0 should leverage existing processing in place, including the CAISO Transmission Planning Process and regional efforts through the Transmission Expansion Planning Policy Committee that has examined regional scenarios.

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Fourth, as RETI 2.0 moves forward, California POU transmission owners will continue to work with the agencies, the CAISO, and other California transmission owners on how best to incorporate POU transmission plans and other relevant information into the initiative.

Finally, it is important to broaden the look at scenarios past mere MWh of renewable output and to include other factors such as integration costs. Key issues will include the extent to which information or assumptions are already included in the CPUC's RPS calculator, and how the RPS calculator or other tools will factor in regional resources.

Sincerely,

A handwritten signature in black ink that reads "Tony Andreoni". The signature is written in a cursive style with a large, stylized initial "T".

Tony Andreoni
Director of Regulatory Affairs