

## DOCKETED

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**Southwestern Power Group Comments on November 2nd RETI 2.0 Workshop**

*Additional submitted attachment is included below.*

**To:** California Energy Commission  
Docket No. 15-RETI-02  
November 2<sup>nd</sup> Joint Agency Workshop on the Organization and Work Plan of the Renewable Energy Transmission Initiative 2.0

**From:** David Getts, Southwestern Power Group

**Date:** November 10, 2015

The Southwestern Power Group (SWPG) is an independent developer of utility-scale generation and transmission in the Desert Southwest. SWPG is developing a 515 mile, double-circuit 500 kV interstate transmission project, known as SunZia that will be capable of delivering renewable energy to AZ, NM, and CA markets.

SWPG appreciates the three agencies launching this transmission planning initiative. California renewable goals and the CAISO's western expansion has made coordination among agencies more important than ever. SWPG supports this initiative's goal of developing a consistent and transparent set of assumptions to be used for renewable and transmission planning. We offer the following comments on the work group goals and objectives.

**RETI 2.0 would benefit from a stand-alone work group that develops metrics and criteria for comparing in-state and out-of-state renewable and transmission options.** It is more important than ever to coordinate assumptions between the agencies when comparing in-state and out-of-state projects. As noted in the RETI 2.0 objectives and the CEC and CPUC July 30, 2015 letter to the CAISO<sup>1</sup>, RETI 2.0 will need to consider regional renewable opportunities. While the Environmental and Land Use Technical Group will pull together data from outside California and the Transmission Technical Group will develop transmission capability and upgrade costs information, neither group is developing a process or metrics to compare in-state and out-of-state alternatives. We therefore urge the creation of a stand-alone work group to explore the complicated question of how ensure full consideration of in-state and out-of-state renewable projects in agencies processes.

There are a unique set of challenges that arise when comparing renewable projects across the west. We envision this work group would for example look at issues related to relative development cost, performance, deliverability, transmission cost assignment, and region-specific sensitivities based on the differences in quality of information obtained.

In the alternative, if it is not feasible to form a work group as outlined above to look at this set of issues, we request that these issues be added to the scope of the Plenary Group.

We look forward to actively participating in the Plenary Group and reviewing the objectives and plan for Transmission Technical Group.

Thank you for your consideration of these comments.

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<sup>1</sup> [http://docketpublic.energy.ca.gov/PublicDocuments/15-IEPR-08/TN205582\\_20150731T103053\\_Judy\\_Grau\\_Comments\\_Letter\\_to\\_CAISO\\_re\\_RETI\\_20\\_from\\_CEC\\_and\\_CPUC.pdf](http://docketpublic.energy.ca.gov/PublicDocuments/15-IEPR-08/TN205582_20150731T103053_Judy_Grau_Comments_Letter_to_CAISO_re_RETI_20_from_CEC_and_CPUC.pdf)