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Comments of Americans for a Clean Energy Grid

Additional submitted attachment is included below.

Comments of
JOHN JIMISON
Managing Director, Energy Future Coalition
On behalf of
AMERICANS FOR A CLEAN ENERGY GRID
On the
RENEWABLE ENERGY TRANSMISSION INITIATIVE 2.0
November 14, 2015

I. Description of Party

The Energy Future Coalition is a non-partisan U.S.-focused public policy initiative (hosted by the UN Foundation) that was launched 10 years ago to address three principal energy challenges:

- The political and economic security threat posed by the world's dependence on oil.
- The risk to the global environment from climate change.
- The lack of access of the world's poor to the modern energy services they need for economic advancement.

The Coalition seeks to connect these challenges with a vision of the vibrant economic opportunities that will be created by a transition to renewable energy, energy efficiency, and the smart grid – three areas where electric utilities play a dominant role – and it has sought to shift the nation's energy policy conversation toward concrete, actionable solutions that can win broad support from business, labor, and the environmental community. In this vain, the Energy Future Coalition launched a campaign in 2009 called Americans for a Clean Energy Grid.

Americans for a Clean Energy Grid support policies that will extend, integrate and modernize the nation's electric power network and unlock clean energy and economic opportunities across the country. Smart state and federal policies that improve the way the grid is developed, planned, and paid for will help it become a more robust, reliable, and secure network that supports expansion of renewable energy, competitive power markets, energy efficiency, and lower costs for consumers. The backbone of a clean electricity system and a strong economy is a resilient and reliable transmission grid.

II. Comments

Americans for a Clean Energy Grid applauds the California Energy Commission (CEC) and California Public Utilities Commission (CPUC) for their foresight in addressing the challenges posed to the electricity transmission infrastructure through the Renewable Energy Transmission Initiative (RETI) 2.0. We view RETI 2.0 as a useful move in developing the significant infrastructure needed to achieve California's decarbonization goals.

Americans for a Clean Energy Grid therefore respectfully offers comments in support of the development of the RETI 2.0 process. We recognize that planning for significant new electric infrastructure can be challenging insofar as it involves interdependencies between a myriad of stakeholders as well as existing and potential resources. This is a process that has been made more complicated as California begins planning its compliance strategy for the Clean Power Plan.

High-voltage electric transmission is perhaps the least popular form of investment in a clean-energy future, because it is expensive, intrusive, unaesthetic, has land-use impacts, has wildlife impacts, and presents difficult issues of cost responsibility because its benefits are widely dispersed in an integrated grid. But it is a necessary one. Without grid access to our remote but incredibly rich resources of renewable energy, we cannot get to a truly clean-energy economy for the nation as a whole.

Electricity can only be transmitted effectively by wire. Our clean energy future will be a thoroughly electrified one, utterly depending on the grid of wires of all scales for its reliability, its affordability, its ability to mitigate natural variability of renewable energy sources, its ability to ensure high power quality and frequency across entire regions, and its ability to support transparent, liquid bulk power markets allowing the least-cost resources to reach available load. While we will also be dramatically more dependent on distributed energy resources, including storage and price-conscious demand, these resources will not substitute for the central grid, but will provide a downstream set of partnering capabilities allowing each to optimize the other through digital interfaces and controls.

We believe that the RETI 2.0 process can and should be an effective complement of California's Clean Power Plan compliance strategy. The previous successes of the RETI program demonstrate the critical role that deliberate, forward-thinking transmission planning plays in unlocking renewable energy capacity. The Tehachapi Renewable Transmission Project, to be completed in 2016, will add or upgrade 250 miles of high voltage transmission to connect 4500 MW of renewable energy, while at the same time relieving costly congestion on the Los Angeles region. Less than two years after it was energized in 2012, the Sunrise Powerlink added more than 1000 MW of renewable energy to San Diego Gas & Electric's resource portfolio, increasing their share from 11.9 to more than 30 percent. Given the discrepancy in time between transmission project completion (5-11 years) and the construction time for renewable generation projects (generally less than 2 years), we applaud the RETI 2.0 pro-active approach of addressing the need for transmission capacity to anticipate the construction of renewable energy generation capacity, especially in regions that are today remote from significant transmission interconnections. Without such initiatives as the RETI 2.0 process, the absence and necessary long lead-times of transmission capacity will clearly become a substantial barrier preventing more renewable generation from coming on-line, and deterring those who would build it.

Americans for a Clean Energy Grid appreciates this opportunity to submit our comments in support of this momentous effort to build the nation's first 50% renewable economy. We look forward to supporting you in achieving this important goal through active participation in the RETI 2.0 process.

Respectfully submitted,



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