

DOCKETED

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LSA Comments on RETI 2.0 Scope and Work Plan

Additional submitted attachment is included below.



November 16, 2015

Submitted online

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California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Re: Docket # 15-RETI-02, Renewable Energy Transmission Initiative 2.0

The Large-scale Solar Association (“LSA”) appreciates the opportunity to participate and comment on the Renewable Energy Transmission Initiative 2.0 (“RETI 2.0”). LSA strongly supports the development of RETI through an open and transparent process and provides suggestions below on how the objectives and process of RETI 2.0 can be clarified to help ensure this effort is successful.

LSA left the November 2nd workshop without a clear sense of the objectives or intended process for this effort. This confusion stems from the articulation during the workshop of varied goals that are not necessarily aligned. They included exploring combinations of resources to best meet goals, identifying opportunities and constraints and supporting least regrets transmission investments.¹ These stated objectives could be three different efforts and it is important to clarify the intent and approach prior to starting it. A least-regrets transmission planning approach is likely to identify a different set of potential resources than a “best fit” or “lower-conflict” approach. In the case of least regrets, it is likely to focus on the most common upgrades and areas from a range of scenarios. A lower-conflict approach could identify new/different areas for development and may choose to prioritize those, while a “best-fit” approach may address the problem based on the attributes that are most likely needed going forward and focus on resources that can provide those attributes. These approaches to this exercise could be

¹ RETI 2.0 Organization Structure and Work Plan Presentation (Nov 2, 2015) p. 2

complementary but are not inherently so. LSA is concerned that without clarification, the process will be lengthy and may not be productive. In addition, notably missing from the discussion is the consideration of cost. Cost is a critical factor to being able to achieve the state's ambitious climate goals and should be included in this planning effort. LSA recommends that the objectives be refined to focus on least-regrets planning, which is the metric that the CAISO must ultimately meet in its Transmission Planning Process and that cost be included as an important factor in developing scenarios.

In addition, the work plan could benefit from more specific direction and parameters for the various groups and set-forth a clear structure for decision-making. LSA recommends the agencies address the following before the individual groups meet:

- What metrics or bounds will guide each group's development of opportunities or constraints?
- How or why are they different from what has already been developed at the CPUC through the RPS calculator or other regulatory processes?
- What kinds of data and land use considerations will be included?
- Who will make the determinations about what data can or should be included in this process and what proper vetting includes? Here we note the Nov 2nd presentation suggests that both the Environmental and Land Use Technical Group and the Plenary Group will vet planning assumptions.
- The presentation indicates that the Plenary Group will be making qualitative determinations about what resource areas the state should be selecting. This goal is unclear. What kinds of qualitative inputs will be considered? How or will they be aligned with projected quantitative needs or characteristics?

Finally, it is important to clarify when in the process decisions will be made and if this is intended to be a consensus stakeholder process or if the agency management team will have final decision-making authority.

LSA also notes that, along with a number of other stakeholders, we have expended considerable effort and time on addressing similar issues via the Renewable Portfolio Standard ("RPS") and Long-term Planning proceeding at the Public Utilities Commission. RETI 2.0 needs to be carefully framed in order ensure that decision-making on these issues is not usurped via a non-jurisdictional effort. To that end, LSA supports

early efforts in RETI to identify the potentially impacted regulatory processes, their respective timelines and potential timing and framework for incorporating the outcomes from RETI into those proceedings. This exercise will help ensure parties both understand how RETI 2.0 may be used and assist stakeholders in appropriately allocating resources to these efforts. In LSA's estimation the following proceedings and processes should be considered as part of such an exercise: CAISO's Transmission Planning Process, CPUC RPS, Green Tariff, Shared Renewables, Long-term Planning, Resource Adequacy, Joint Reliability, Storage, forthcoming Integrated Resource Planning efforts and possibly the distributed energy planning proceedings.

LSA appreciates the opportunity to provide feedback on RETI 2.0 and looks forward to participating in this effort.

Sincerely,

/s/ Rachel Gold

Rachel Gold

Policy Director

Large-scale Solar Association