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Suggestions to the RETI 2.0 Process

Additional submitted attachment is included below.

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COMMENT LETTER FOR RETI 2.0

I've spent nearly 20 years managing environmental documents that have evaluated proposed high voltage transmission lines and developing alternative transmission line routes across California and the west. My projects have including the Sunrise Powerlink EIR/EIS, Devers-Palo Verde No. 2, West of Devers Upgrade, and others). I also worked with the DRECP Transmission Technical Group, so I'm familiar with the result of that process, and I've managed several environmental analyses of large solar power project projects. Based on this experience, I would like to offer two suggestions for consideration in the RETI 2.0 process.

We all know how hard it is to find acceptable rights-of-way for new transmission in California – most of the state is just not available for new transmission siting. Because of that, most new high voltage transmission is likely to be constrained to places where existing rights-of-way are located and corridors already defined. As a result, I have the following specific comments and suggestions.

1. Implement the Garamendi Principles through Definition of Specific Opportunities and Constraints in Key Corridors

I propose that RETI 2.0 put special emphasis on implementing the Garamendi Principles – not just by citing the principles, as is often done, but through detailed mapping, research, and definition of all opportunities and constraints affecting key existing rights-of-way. I am also offering to lead or participate in this effort. First, a reminder of the Garamendi Principles:

> ***Garamendi Principles**: In 1988, in recognition of the value of the transmission system and need for effective long term transmission corridor planning, SB 2431 (Garamendi, Chapter 1457, Statutes of 1988) declared that it is in the best interests of the state to accomplish the following:*
>
> - *Encourage the use of existing rights-of-way by **upgrading existing transmission facilities** where technically and economically justifiable.*
> - *When construction of new transmission lines is required, **encourage expansion of existing rights-of-way**, when technically and economically feasible.*
> - *Provide for the creation of new rights- of-way when justified by environmental, technical, or economic reasons, as determined by the appropriate licensing agency.*
> - *Where there is a need to construct additional transmission, seek agreement among all interested utilities on the efficient use of that capacity*

I suggest that RETI 2.0 focus on clearly defining the specific ways that the first two Garamendi Principles can be implemented, making existing transmission corridors available for future use by renewable generators. The goal would be to define the following:

a) Upgrading existing transmission facilities: <u>Where and how can this be done?</u>

We should develop a list of existing transmission facilities that have upgrade potential. The transmission operators will have most of this information available, but the RETI group will need to develop a process for gathering input from the transmission operators. I suggest developing a list of priority transmission segments (based on a definition of likely renewable generation focus areas), then developing a questionnaire for the operators, asking about specific upgrade potential. This effort could include consideration of reconductoring (maximizing use of existing structures), re-building some or all structures to increase capacity with larger conductors at the same voltage, or re-building some or all structures to increase the voltage of the corridor.

b) Expanding facilities in and adjacent to existing rights-of-way and using designated corridors: <u>Where and in what specific ways can this be done?</u>

I recommend that this task focus on federal lands, because these lands occupy the bulk of the eastern part of the state. In addition to carrying renewable generation located in the eastern portion of the state to load in coastal California, they are also the gateway to potential new transmission facilities that would allow import and export of renewables between California and other states. Again, I offer to manage or participate in this task. This task will require data to develop the following:

i. Define and map all federally-designated corridors, including those on BLM, NPS, and USFS lands, and including the 368 corridors. Include detailed data on corridor width and constraints on use of the corridor (e.g., existing utilities, roadways, critical habitat, other environmental constraints).

ii. Map all existing transmission lines (above 200 kV) on federal lands. Define the width of the operational ROW, and map specifically the land use constraints on both sides of the ROW. This would include lines both within and outside of designated corridors, and the following data:

a) Physical constraints (e.g., a line or corridor that is adjacent to a freeway that can't be expanded on the freeway side because there is no physical space on the other side);

b) Land use designation constraints (e.g., existence of a line that passes through National Park System lands or BLM designated wilderness may not indicate space for an adjacent line to be added, since that would expand in or into a National Park unit or wilderness area);

c) Habitat and other environmental constraints (e.g., an existing corridor in or adjacent to designated critical habitat or valued cultural resources may be constrained in expansion potential;

d) Record corridor width based on federal grants to each utility, and define constraints on installing adjacent lines outside of existing grants.

2. Develop a Functional Process to Open Certain Caltrans-Managed Controlled Access Highways to Overhead and Underground Transmission Lines

The linear corridors created by major highways throughout California and the West present valuable opportunities for collocation of electric utilities. In all of the major transmission line projects I've worked on, the public has suggested alternatives that follow or use highway rights of way. With CPUC staff, I've met several times with Caltrans, and they have explained that their regulations do allow for use of controlled access rights-of-way by utilities, but only if no other alternatives exist. With the availability of linear rights-of-way becoming more and more constrained, these existing corridors require serious consideration.

I suggest establishing a working group with Caltrans to define conditions under which there could be consideration of shared ROWs between restricted use state highways and overhead or underground transmission lines. Currently, such use is essentially prohibited by Caltrans' interpretation of its regulations. This eliminates consideration of potentially valuable linear corridors from use. This process will require high-level coordination between the CPUC, CEC and Caltrans in order to develop creative approaches to safe and well-planned highways and transmission corridors.

Conclusion

I look forward to participating in the RETI 2.0 process to improve our transmission system and the planning process for future expansion of renewable generation in California and the West.

Sincerely,
Aspen Environmental Group

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Vice President