

## DOCKETED

|                         |  |
|-------------------------|--|
| <b>Docket Number:</b>   | 15-RETI-02   |
| <b>Project Title:</b>   | Renewable Energy Transmission Initiative 2.0   |
| <b>TN #:</b>            | 206876   |
| <b>Document Title:</b>  | Comments on the Renewable Energy Transmission Initiative (RETI) 2.0 Environmental and Land Use Technical Group |
| <b>Description:</b>     | N/A  |
| <b>Filer:</b>           | Patty Paul   |
| <b>Organization:</b>    | TransWest Express LLC/David Smith  |
| <b>Submitter Role:</b>  | Public   |
| <b>Submission Date:</b> | 12/8/2015 8:39:39 AM   |
| <b>Docketed Date:</b>   | 12/8/2015  |



555 Seventeenth Street  
Suite 2400  
Denver, CO 80202  
Tel 303.298.1000  
Fax 303.299.1356

*VIA ELECTRONIC DELIVERY*

December 7, 2015

Docket Unit  
California Energy Commission  
Dockets No. 15-RETI-02  
1516 Ninth Street, MS-4  
Sacramento, CA 95814-5512  
[DOCKET@energy.ca.gov](mailto:DOCKET@energy.ca.gov)

RE: Response to 11/23/15 Key Questions for to the Environmental and Land Use Technical Group

Dear Technical Group Members:

TransWest Express LLC (TransWest) appreciates the opportunity to provide comments to the Renewable Energy Transmission Initiative (RETI) 2.0 Environmental and Land Use Technical Group. TransWest is an independent transmission developer that is focused on permitting and developing the TransWest Express Transmission Project (TWE Project) to benefit consumers and customers in California and the Desert Southwest.

The TWE Project is a 730-mile, 600 kilovolt (kV) direct-current (DC) transmission system that when completed will be capable of providing California with access to 12,000 gigawatt-hours (GWh) per year of Wyoming's high-quality and low-cost wind energy. Wyoming has the best onshore wind resources in the nation, and the TWE Project will provide a critical link between these renewable resources and California's power markets. The TWE Project's DC technology provides for a cost-effective, efficient and bi-directional transfer of renewable power between Wyoming and the Desert Southwest.

The TWE Project's southern terminal will be interconnected to existing 500 kV substations located near the Nevada-California border, which are owned and operated by the California Independent System Operator Corporation (CAISO), CAISO Participating Transmission Owners, the Los Angeles Department of Water and Power, and others. There is also a third terminal being permitted near Delta, Utah, which would allow the TWE Project to interconnect with other utility systems.

The TWE Project will be built in two phases. Initially, the TWE Project will operate at 1,500 MW; the second phase will upgrade the line to operate at 3,000 MW. The TWE Project also is being permitted to allow 500 kV alternating current (AC) technology to be used.

The TWE Project was one of just five transmission projects in the western United States, and the only one to be directly connected to the California grid, to be prioritized in 2011 by the Rapid Response Team for Transmission (RRTT). The RRTT is led by the White House Council on Environmental Quality, the U.S. Department of the Interior, the U.S. Department of Energy, the U.S. Department of Agriculture and other federal agencies.

The U.S. Department of Energy's Western Area Power Administration (Western) is currently participating in the TWE Project through its Transmission Infrastructure Program pursuant to a Development Agreement between TransWest and Western executed in September 2011. Western's Transmission Infrastructure Program is specifically focused on developing transmission projects that facilitate the delivery to market of power generated by renewable energy resources.

Western and the Bureau of Land Management, Department of the Interior (BLM) jointly prepared an Environmental Impact Statement (EIS) for the TWE Project in compliance with the National Environmental Policy Act (NEPA). The Final EIS was published in May 2015, and their respective Records of Decision are scheduled for March 2016. The NEPA compliance process represents the primary permit for most transmission lines in the western United States due to the extent of federal land in the region. Federal land makes up the majority of land crossed along all of the alternative routes analyzed in the EIS, including about 467 miles of the 730-mile Agency Preferred Route. The states of Colorado, Nevada, Utah and Wyoming, 24 counties, two Tribal Governments, six conservation districts, the U.S. Forest Service, and other groups are cooperating agencies working with the BLM and Western on the EIS.

State and local permit reviews typically rely on the NEPA analysis to inform their analysis and are conducted after the process is completed. Nevada requires a Utility Environmental Protection Act Permit Application to be filed within 30 days of the federal Final EIS being published. TransWest received a conditional permit from Nevada in September 2015. TransWest plans to file a Wyoming Industrial Development Information and Siting Act Permit Application after the federal Records of Decision are issued. State permits are not required for the TWE Project in Utah or Colorado. County level permitting activity also will commence after the Records of Decision are issued.

Our comments in response to the specific CEC questions follow below.

***What environmental data are relevant to inform renewable energy planning activities in California, and in the West-wide Interconnection?***

TransWest's response is based on the premise that renewable energy planning activities are limited to the screening and comparative analysis of viable renewable energy projects and any needed transmission projects. Presentations at the November 23, 2015, Technical Group workshop indicated that some group members are advocating these planning activities to include the development or planning of renewable energy zones in California primarily to be later perfected by programmatic authorized environmental reviews that would then streamline future site permitting activities.

TransWest fully supports the authorized programmatic review of potential renewable energy zones and conservation areas, e.g., the Desert Renewable Energy Conservation Plan approach. However, the RETI process should not be limited to the pre-screening of potential areas. RETI should use the best results and the available data from authorized programmatic and project-specific reviews of renewable projects, transmission line projects and renewable energy zones as the primary source of environmental and land use data. The BLM and other authorized permitting agencies maintain databases of the status of various renewable energy projects, renewable energy programmatic reviews and transmission projects in California and throughout the west that are underway and moving forward. While all of these reviews may not be completed, the status of these efforts, along with the data reviewed and outlined within the related environmental documents, will provide a wealth of useful information that can benefit the Environmental and Land Use Technical Group. Any additional environmental and/or land use data that is not covered within these reviews that is relied on for planning activities would not be relevant to these authorized reviews.

In the case of potential renewable resource areas that are not undergoing an authorized environmental permitting review, other initiatives and data collection activity may be relevant although only as a secondary source of information to screen and compare the areas. Data used in these high-level non-authorized reviews should not be treated as any more relevant than the outcomes and data developed within high-level authorized reviews.

With respect to regional (e.g. Tehachapi, Sunrise, Devers-Colorado River, etc.) or inter-regional transmission lines (e.g. TransWest, Gateway South, Sunzia, etc.) the typical development time takes on the order of 10 years. All of these projects have gone through extensive NEPA review, which requires the analysis of alternatives including routing alternatives. At the November Technical Group meeting, the WECC Environmental and Cultural Data Use in Planning was presented. TransWest as a WECC member has participated extensively with planning initiatives at WECC over the past six years. The environmental data used by WECC in the planning process has dramatically improved over the years, but because it is collected at a large-scale and high level, it simply is not as refined and detailed as the data that becomes available through the NEPA review process. This example reinforces why data from the authorized environmental permitting reviews should be used as the primary source if available and then supplemented with other data.

TransWest provided comments on September 28, 2015, to the CPUC in response to a staff paper on Incorporating Land Use and Environmental Information into the RPS Calculator. Within these comments, TransWest outlined how such data should be used to score areas and projects. In reply comments to the CPUC, the Defenders of Wildlife and Sierra Club stated that they disagreed with this scoring concept and the higher ranking for permitted projects over projects that haven't begun the permitting process. TransWest reasserts that actual site-specific, project-specific data collected by authorizing agencies for a "today project" will be more valid than generalized data about a broad-scale area and a "someday project"

***For the available and relevant data what are the significant data gaps and what should be done to resolve them, both short term and long term?***

The Technical Group should review the various project and program databases operated and maintained by the BLM, WECC and the CEC. The sub-regional planning groups also keep databases of different transmission projects. The information available from these organizations can be compiled to identify the amount of potential energy from these projects and/or programs and to review the environmental and land use data. This can and should be compiled in the short term. There are several initiatives underway that could potentially fill in some gaps on other areas that haven't undergone an authorized review. Then there are potential areas that have not undergone any type of authorized or organized programmatic review. Information from the first two groupings of areas may be useful to generally scale how much of the potential area may be developable in the short term. In the long term, as information and direction comes back from the RETI Plenary Group and transmission groups about certain targeted areas, more extensive reviews could be initiated as needed.

***How should key environmental data best be used to inform various renewable energy planning activities in California and in the West-wide Interconnection.***

Planning activities should be informed first by authorized environmental permitting activities as the primary source, then second by programmatic non-authorized environmental review initiatives, and then followed by other work that may be relevant.

***How can we best work together to ensure that relevant environmental data and criteria are consistently and routinely applied and considered in renewable energy planning processes?***

The Technical Group may wish to develop a timeline to show how many years it would take to implement the various planning activities being contemplated. This review would best inform the data and criteria discussion. For example, one potential planning activity includes the non-authorized programmatic review of potential areas for development of conservation and renewable energy zones. TransWest understands that this review could potentially be followed by an authorized programmatic environmental review (e.g. CREPC) of other potential areas, followed by (streamlined) project-specific authorized environmental reviews of renewable energy projects and transmission projects. Meanwhile, specific projects have already entered or completed the final step above and therefore should be highly considered as environmentally preferable projects in renewable energy planning process.

TransWest notes that the RETI process has a 15-year planning horizon but some of the policy needs include shorter planning horizons:

- SB350 includes reaching a 40% RPS target in 2024 and a 45% target by 2027.
- The final Clean Power Plan has an interim compliance period starting in seven years and an optional incentive program starting in 2020.
- The integration of the PacifiCorp and CAISO balancing areas, while still at the proposal stage, includes a potential implementation within 10 years.

The timing of these initial non-authorized reviews, plus the authorized programmatic reviews, plus the specific streamlined project reviews should be compared with the system needs outlined above and with the projects that have already progressed in the specific project reviews.

***How do we ensure that relevant data remain of high quality, is readily available, and up to date for use in renewable energy planning processes?***

By focusing on the status and results of authorized environmental permitting reviews, the Technical Group should have high-quality data that can be readily available and kept up to date fairly easily. The BLM, WECC and CEC maintain such databases and could most likely provide insights on the level of effort to update these programs. The environmental data used within the programmatic review of areas or transmission lines presents a much more difficult management challenge; however, the database tool appears to be a relatively efficient tool to manage these GIS data sets. Although the value of this highly granular environmental and land use data needs to be highly aggregated to be relevant in the renewable energy planning activities.

Thank you for your consideration of these comments.

Sincerely,  
TRANSWEST EXPRESS LLC

/s/David F. Smith

David F. Smith  
Director Engineering and Operations