

## DOCKETED

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## **SDG&E Comments on RETI 2.0 Staff Workshop 12-4-15**

Comments filed on behalf of SDGE.

*Additional submitted attachment is included below.*



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California Energy Commission  
1516 Ninth Street  
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**RE: Docket: 15-RETI-02. SDG&E Comments on the November 23, 2015 and December 4, 2015 Renewable Energy Transmission Initiative (RETI) 2.0 Environmental and Land Use Technical Group workshops**

Dear Commission Staff:

The CEC and CPUC staff convened an Environmental and Land Use Technical Group (ELUTG) workshop November 23, 2015 and December 4, 2015. The topics discussed at the workshop included reviewing available statewide and west-wide environmental data and approaches to using these data. SDG&E appreciates the opportunity to submit these comments on the ELUTG workshops.

SDG&E recommends a set schedule of tentative meeting dates and times with key tasks to be accomplished by the end of each meeting for the remainder the RETI 2.0 process. This implies the need for both the Transmission Technical Input Group (TTIG) and Plenary Group (PG) to do the same in order for all groups to be better aligned with the five RETI 2.0 overall objectives and timeline. The question was asked, and still remains open, as to how the Environmental and Land Use Technical Group (ELUTG) will reach agreement and make recommendations to the TTIG and PG. SDG&E recommends that ELUTG strive for consensus; but where consensus is not possible, make recommendations by majority vote of all entities present and invite dissenting entities to forward alternative views. This is consistent with RETI 2.0's first objective of using a "statewide, non-regulatory planning effort to help meet statewide GHG and renewable energy goals (with an) open, transparent, stakeholder process."

SDG&E would like to point out to stakeholders that the CPUC staff does not currently plan to weigh environmental factors and economic factors in the RPS Calculator model's renewable resource selection algorithm. Instead, environmental factors will be used to either include or exclude renewable resource development options from consideration in the RPS Calculator model. SDGE agrees with the approach of using already-available data and processes to put together a plan that fills certain gaps in prior and current initiatives while avoiding duplication. On that note, SDG&E urges greater clarity with regard to how RETI 2.0 will fit into, and affect, these prior and existing initiatives. The ELUTG's first goal states "Assemble relevant in-state and west-wide environmental data." This is clearly a phase 1 task with the second ("assist in evaluating the relative environmental implications of alternative renewable energy generation areas, potential transmission and potential transmission corridors") and third ("assist in developing a range of renewable energy generation and

transmission area combinations and scenarios that minimize potential environmental conflicts”) falling into phase 2 tasks.

After hearing presentations on environmental data tools in the last two ELUTG workshops which addressed available environmental data and approaches to using the data, it’s time to move on to the next milestone of the group discusses focusing data interpretation and data combination of multiple data sets. ELUTG has received informative presentations on a few environmental data tools and it can now transition to the necessary discussion of how to assemble and use it. ELUTG needs consistent data sets for scenarios to inform the TTIG and PG, and create a better picture of resources west-wide. If there is a need to form sub-groups for phase 1 tasks, SDG&E recommends they be informally organized with each group focusing on combining in state and out of state data for use in the Data Basin Gateway, establishing a set standard for granularity of data across the entire west-wide region, and other critical tasks that need to be accomplished in between meetings. The meetings should focus on key tasks to be accomplished (as would be outlined in the RETI 2.0 schedule with key tasks). For the process to keep moving forward in a timely fashion, ELUTG should resist getting lost in granularity not directly relevant to high potential renewable resource development areas and corridors where transmission expansion holds promise. It is important to place in-state and out-of-state renewable resource options and transmission development options on a comparable level. In particular, a consistent methodology for estimating the capacity and energy benefits of different renewable resource options in different locations across the WECC should be used. SDG&E recommends that these benefits be captured through use of the RPS Calculator model.

The group’s discussion of continuing to identify species, habitat, and land for conservation is commendable. Yet, it is not within the goals and objectives of the ELUTG of assembling relevant environmental data before continuing on to focus on the 2<sup>nd</sup> and 3<sup>rd</sup> goal of assisting in evaluating the relative environmental implications of alternative renewable energy generation areas, potential transmission & potential transmission corridors and assisting in developing a range of renewable energy generation and transmission area combinations and scenarios that minimize potential environmental conflicts. Those discussions would be best suited for another forum due to focus of the RETI 2.0 process and its ambitious schedule. Lastly, assuming the ELUTG decides to use the Data Basin Gateway, there needs to be an open and transparent group discussion of how the Data Basin Gateway will utilize the available out-of-state environmental data. SDG&E believes that this discussion needs to be a priority among the phase 1 tasks.

SDG&E appreciates your consideration of these comments.

Sincerely,

*Tamara Raspberry*