

DOCKETED

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Comments of the Modesto Irrigation District to RETI 2.0 Dec. 18, 2015 Plenary Group Meeting/Webinar

Additional submitted attachment is included below.



January 7, 2016

Via e-Comment Portal

California Energy Commission
Docket Unit
Docket No. 15-RETI-02
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512

Re: Docket No. 15-RETI-02 – MID Comments in Response to the Renewable Energy Transmission Initiative 2.0 Plenary Group December 18, 2015 Meeting/Webinar

The Modesto Irrigation District (“MID”) appreciates the opportunity to offer comments in response to the December 18, 2015 Meeting/Webinar held by the Plenary Group for the Renewable Energy Transmission Initiative (“RETI”) 2.0 process.

MID is an irrigation district, organized and operated under the laws of the State of California, which undertakes both electric and water operations. With regard to its electric operations, MID owns and operates facilities for the generation, transmission, distribution, purchase, and sale of electric power and energy at wholesale and retail. MID is a fully integrated, fully resourced utility.

On September 24, 2015, MID submitted comments in response to the September 10, 2015 Joint Agency Workshop in this proceeding. In those comments, MID explained its commitment to California’s renewable energy and climate goals, described its reliance on transmission to serve its customers and raised concerns about the rising price of transmission. MID echoed the views of stakeholders at the September 10, 2015 Joint Agency Workshop that the RETI 2.0 process should encourage the use of existing infrastructure and rights-of-way to accomplish the goals of this process.

MID raises these points to the Plenary Group as they develop the Preliminary Work Plan that will extend through the third quarter of 2016. MID understood from the dialogue at the December 18 workshop concerning the Transmission Technical Input Group that the California Independent System Operator Corporation (“CAISO”) takes cost into account in its Transmission Planning Process. MID urges the Transmission Technical Input Group to take cost into account in conducting its analyses and make consideration of cost an express part of its

analysis and recommendations that are presented to the Plenary Group. MID, in turn, requests the Plenary Group to expressly engage cost considerations in this process. The Plenary Group should make an objective of the RETI process the siting of resources and transmission when they provide a cost-effective alternative, in preference to options which may provide access to renewable power, but require the installation of more expensive infrastructure.

Last, as the RETI process progresses, MID recommends that the Plenary Group, Transmission Technical Input Group and Environmental and Land Use Technical Group avoid speaking to specific projects. To the extent that additional infrastructure needs are identified, any recommendations by these groups should not speak to individual projects, but should instead identify those needs in general terms and allow the responsible entities to determine how those needs will actually be met.

MID looks forward to the continued development of this process, and thanks the Plenary Group for being willing to receive comments.

Respectfully yours,

 /s/ Martin Caballero

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