

## DOCKETED

<b>Docket Number:</b>	15-RETI-02
<b>Project Title:</b>	Renewable Energy Transmission Initiative 2.0
<b>TN #:</b>	207227
<b>Document Title:</b>	Southwestern Power Group Comments on Plenary Group Work Plan Meeting
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Carrie Bentley
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	1/7/2016 3:22:00 PM
<b>Docketed Date:</b>	1/7/2016

*Comment Received From: Carrie Bentley*

*Submitted On: 1/7/2016*

*Docket Number: 15-RETI-02*

## **Southwestern Power Group Comments on Plenary Group Work Plan Meeting**

Please see attached.

*Additional submitted attachment is included below.*

**To:** California Energy Commission  
Docket No. 15-RETI-02  
December 18, 2015 Renewable Energy Transmission Initiative 2.0 Plenary Group Preliminary Work Plan Meeting

**From:** David Getts, SouthWestern Power Group

**Date:** January 7, 2016

The SouthWestern Power Group (SWPG) is an independent developer of utility-scale generation and transmission in the Desert Southwest. SWPG is developing a 515 mile, 500 kV interstate transmission project, known as SunZia, that will be capable of delivering up to 3,000 MW of renewable energy to AZ, NM, and CA markets via the Palo Verde hub as early as 2020.

SWPG appreciates and supports the Plenary Group's objectives and inclusion of the specific goal to assess out-of-state resources. It will be challenging to compare California and out-of-state renewable resources given the differences between and availability of the existing land-use and production information between the two areas. SWPG supports the Plenary Group plan to address this challenge in February and to leave open the potential for additional out-of-state studies or information to be provided to the Plenary Group beyond what can be assembled by the Land Use Group.

SWPG also strongly supports out-of-state renewable resources being treated as reasonable alternatives to in-state resources, especially given the success of the EIM and potential expansion of the CAISO. In the next couple of months as the Plenary Group considers which scenario approach or approaches to recommend at the Agency Executives Workshop in March, SWPG asks the Plenary Group to develop an approach which does not inherently disadvantage out-of-state renewable resources. We support an approach that provides a qualitative check on any quantitative scenario assessment, particularly during the assessment of overlapping transmission solutions between plausible scenarios. For example, if there are ten "plausible internal scenarios" and two "plausible West-wide scenarios" we would not support an approach that leads to the Plenary Group recommending only internal transmission upgrade solutions simply because there were more plausible internal scenarios. We believe that large, out-of-state renewable energy resources will provide California utilities with important procurement options for achieving least cost/best fit results in meeting the State's policy goals of decarbonization. These options will only be available if they are reasonably included in the CAISO's transmission plans going forward.

Finally, the Plenary Group asked what are the right resource metrics and quantities for RETI 2.0 to plan toward. SWPG supports planning for the complete set of resource metrics and quantities already established by the CPUC and California legislature. Although these may include overlapping metrics and multiple targets, these will all have to be met through additional renewable capacity and transmission, and therefore should be considered within the Plenary Group.

Thank you for your consideration of these comments.