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SWPG Comments on RETI 2.0 Transmission Technical Input Group

Additional submitted attachment is included below.

To: California Energy Commission
Docket No. 15-RETI-02
January 22, 2016 Renewable Energy Transmission Initiative 2.0 Transmission Technical Input Group Workshop

From: David Getts, SouthWestern Power Group

Date: February 4, 2016

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 4,500 MW of renewable energy to AZ, NM, and CA markets.

SWPG appreciates the opportunity to speak along-side other developers of out-of-state projects at the January 22, 2016 Transmission Technical Input Group (TTIG) workshop. We particularly commend the agencies for collecting information about transmission projects in development and about renewable resource potential outside of California. This information is vital to understanding how California's future renewable goals may be met from sources both inside California and outside California.

Reflecting on the workshop, SWPG offers a few comments for the agencies' consideration:

1. New Mexico and Wyoming offer good wind portfolios that should be considered in the California RPS mix and accommodated in the RETI 2.0 recommended transmission scenarios

From the presentations and the discussions at the workshop it is clear the New Mexico and Wyoming seem to offer renewable sources that are beneficial to the California RPS mix. Also, transmission projects are in development that could bring up to 3,000 MWs to California from each of these regions. It seems productive for the agencies to pursue RPS and infrastructure planning options that consider at least this level of resources from each of these regions. It seems prudent for RETI 2.0 recommended scenarios to plan for renewables from both the NM and WY regions.

2. There are many viable and redundant projects under development; agencies should not pick winners and losers, but rather assume projects get developed from both New Mexico and Wyoming

The presentations reflect the fact that there are redundant projects being developed at this time. It is of course not possible to determine yet whether all the transmission projects will make it to the construction stage. To the extent possible, the agencies should avoid including specific transmission projects at this time and rather plan for the delivery of renewable energy through the various California intertie locations. This will enable the most efficient technical and commercial transmission project outcomes without the agencies biasing the commercial outcome through, for example, portfolios that assume one specific project or another gets developed.

3. Because transmission project lead times are so long, there are benefits to removing any further structural impediments

As Mr. Millar mentioned at the workshop, it is clear from the presentations that many of the projects have been under development for close to, or more than, a decade. Large scale, multi-state projects that are not already under development will likely not be commercially available by 2030. To the extent the RETI 2.0 process can influence the portfolio selection and/or the procurement process, this may enable the success of renewable projects under development by reducing commercial and California transmission system constraints. This in turn would ensure that California's environmental objectives can be met as efficiently as possible.

SWPG would be pleased to answer any questions or provide additional information that might assist in the TTIG's efforts. Please do not hesitate to contact me at (602) 808-2004 or dgetts@southwesternpower.com Thank you for your consideration of these comments.