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Additional submitted attachment is included below.

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**POSTED ELECTRONICALLY TO
DOCKET 15-RETI-02**California Energy Commission
Dockets Office, MS-4
Docket No. 15-RETI-02
1516 Ninth Street
Sacramento, CA 95814-5512Re: Docket 15-RETI-02: Pacific Gas and Electric Company Comments on the Proposed Planning Goals for the Renewable Energy Transmission Initiative 2.0 Process**I. Introduction**

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to provide comments on the January 29, 2016, Plenary Group meeting of the Renewable Energy Transmission Initiative (RETI) 2.0 hosted by the California Public Utilities Commission (CPUC), California Energy Commission (CEC), and California Independent System Operator (CAISO).

As a non-regulatory planning process, RETI 2.0 should focus on how best to inform the inputs to existing regulatory proceedings, such as the CPUC's Renewables Procurement Standard (RPS) Calculator and Long Term Procurement Plan (LTPP) proceedings and the CAISO's transmission planning processes (TPP), without creating new metrics or scenarios. RETI 2.0 should set planning goals and utilize other planning assumptions that are aligned with these existing proceedings and which target the legislatively mandated 50 percent Renewables Procurement Standard (RPS) set forth in Senate Bill (SB) 350.

II. RETI 2.0 Planning Assumptions Should Align with Existing Regulatory Proceedings and Existing Statutory Requirements

To be most useful, RETI 2.0 should align with the scenarios and metrics in the other regulatory proceedings it will inform. Specifically, a draft ruling on the assumptions, scenarios, and RPS portfolios to be used in the 2016 LTPP and 2016-2017 TPP was issued by the CPUC on February 8, 2016.¹ This ruling contains a variety of demand and system assumptions to be used

[Planning Assumptions and Scenarios Update For The 2016 Long Term Procurement Plan Proceeding and The CAISO 2016-17 Transmission Planning Process](#). California Public Utilities Commission. Rulemaking 13-12-010.

for the next round of regulatory planning processes, and once the CPUC issues a final LTPP ruling, RETI 2.0 should rely on this information to ensure that RETI 2.0 will best inform future planning and regulatory proceedings.

When finalized, the 2016 LTPP will provide energy demand and “rest-of-system” assumptions from the 2015 Integrated Energy Policy Report that should be used by the RETI 2.0 process, including the finalized 2015 California Energy Demand Electricity Demand Forecast (CED 2015), behind-the-meter solar photovoltaic (PV) forecasts, updated energy efficiency values more in line with the expected results of SB 350 implementation, and various RPS scenarios.

In addition to drawing its demand and system assumptions from existing proceedings, RETI 2.0 should use the existing legislatively mandated 50 percent RPS requirement as the benchmark for determining the incremental renewable resources needed. While numerous processes are underway to develop integrated resource plans that will inform how the electricity sector can help achieve additional greenhouse gas emission (GHG) reductions by 2030, planning for the 50 percent RPS requirement by 2030 is the only renewables target that should be used in the RETI process. SB 350 does not require the California Air Resources Board (ARB) to set binding GHG reduction targets for the electric sector or individual load-serving entities (LSEs).² Accordingly, it would be inappropriate to use a benchmark for incremental renewables other than the 50 percent RPS prior to the completion of existing proceedings that are considering the most cost-effective ways for the state to achieve its GHG emission reduction goals.

To reach the 50 percent RPS goal set forth by SB 350, RETI 2.0 should look to the CPUC’s RPS Calculator framework, since it generates plausible portfolios of renewable resources based on least-cost best-fit principles. To align with and inform the relevant regulatory proceedings, it is crucial that RETI 2.0 studies at least one renewable and transmission scenario created with the same least-cost framework used in the LTPP and TPP trajectory/default cases.

Finally, PG&E supports the consideration during RETI 2.0 of key issues for renewable transmission identified by PG&E and other RETI stakeholders to date, including:

- Cost-effective pathways for developing out-of-state renewable energy resources and associated transmission, and the effect of the potential CAISO footprint expansion on these pathways.
- The potential development of energy-only RPS resources and the associated effect on the need for new transmission.
- The impact of additional renewable energy demand in neighboring states in the WECC, such as that driven by the United States Environmental Protection Agency’s (EPA) Clean Power Plan.

² Sections 454.52 and 9621 of SB 350 presume the existence of a 2030 GHG reduction target percentage for the electricity sector as a whole and for individual LSEs. However, neither AB 32 nor SB 350 specifically directs ARB to establish sector-specific GHG emission reduction targets. See PG&E’s [January 11, 2016 SB 350 Integrated Resource Plan Targets Comments at the California Air Resources Board](#).

Data sources identified or refined during the RETI 2.0 process should function to assist the regulatory planning processes to answer these key issues.

III. Conclusion

We appreciate this opportunity to comment on the planning assumptions and goals for RETI 2.0 and look forward to continued participation in this effort.

Sincerely,

/s/

Nathan Bengtsson