

DOCKETED

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Comments Following January 29, 2016, Joint Agency Workshop on California Renewable Energy Transmission Initiative 2.0 (â€œRETI 2.0â€)

I hope that you can accept these comments, filed slightly late due to connectivity problems while traveling.

Additional submitted attachment is included below.



California Wind Energy Association

February 12, 2016

California Energy Commission
Docket Unit, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

RE: Docket No. 15-RETI-02 -- Comments of the California Wind Energy Association following the January 29, 2016, Renewable Energy Transmission Initiative 2.0 Plenary Group Meeting

The California Wind Energy Association (CalWEA) offers the following brief comments following the January 29, 2016, Renewable Energy Transmission Initiative 2.0 (“RETI 2.0”) Plenary Group Meeting.

CalWEA’s earlier comments in this process have highlighted the lack of clarity with regard to the objectives of RETI 2.0, and how those objectives will fit into, and affect, existing regulatory proceedings. We are disappointed that this lack of clarity persists. Indeed, the RETI 2.0 Plenary Group objectives set forth at the January 29, 2016, meeting are largely being addressed in ongoing processes at the CPUC and the CAISO with the benefit of substantial resources and broad stakeholder participation.

Many stakeholder comments that are being made are raising questions, explicitly or implicitly, about the goals of the RETI process and how they relate to ongoing regulatory processes. Several parties have pointed to information and activities in ongoing CPUC proceedings as those that should be used in the RETI process.¹ During the January 29 workshop, it was stated that RETI 2.0 will augment, not supplant, the work of the CPUC, noting that RETI 2.0 will look at how we can access renewable resources with transmission. However, transmission planning is, in fact, integral to the ongoing and coordinated work of the CPUC and the CAISO, as was described in the CAISO’s January 22, 2016, presentation at a RETI workshop, as well as earlier in this process.

Other parties have highlighted the results of the CAISO’s Special Study conducted in conjunction with the CPUC’s LTPP/RPS processes, evaluating the ability to accommodate “energy only” renewable resources on the grid. This study demonstrates that nearly 26,000 MW of in-state resources can be accommodated on the existing transmission system, which significantly exceeds the incremental

¹ See, e.g., the January 14, 2016, comments of PG&E and the February 4, 2016, comments of BAMx.

renewables needed in the CAISO balancing authority area to achieve the 50% RPS goal.² This finding is consistent with the geothermal industry's comment that 600 MW of transmission is currently available to export new geothermal generation out of Imperial County.³

The findings of the CAISO's Special Study and ongoing CPUC proceedings suggest that a more productive focus for RETI 2.0 is in order. For example (and consistent with CalWEA's suggestions in our November 16, 2015, comments), PG&E has recommended that RETI focus on cost-effective pathways for developing out-of-state renewable energy resources, and associated transmission, to meet the 50% RPS goal, and how that might change if the CAISO footprint expands in the future.⁴

CalWEA again encourages the refinement of the goals of RETI 2.0 to avoid duplication of existing efforts and to conserve agency and stakeholder resources.

Sincerely,

A handwritten signature in black ink that reads "Nancy Rader". The signature is written in a cursive, flowing style.

Nancy Rader
Executive Director

² See BAMx February 4, 2016, comments following the January 22, 2016, RETI 2.0 workshop.

³ See Geothermal Energy Association's November 12, 2016, comments on RETI 2.0.

⁴ See PG&E's January 14, 2016 comments following the RETI 2.0 workshop on December 18, 2015.
