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BAMx Comments on RETI 2.0 Plenary Group Meeting on Renewable Resource Areas

Attached please find Bay Area Municipal Transmission Groupâ€™s (BAMx) written comments in response to the RETI 2.0 Renewable Resource Areas and Values Workshop, dated March 16, 2016.

Additional submitted attachment is included below.

Bay Area Municipal Transmission Group's Comments on the Renewable Energy Transmission Initiative 2.0 Plenary Group Meeting on Renewable Resource Areas

March 30, 2016

The Bay Area Municipal Transmission Group[1] (BAMx) appreciates the opportunity to comment on the Renewable Energy Transmission Initiative 2.0 (RETI 2.0) Plenary Group presentations from the Workshop on Renewable Resource Areas and Values on March 16, 2016.

BAMx Responses to Plenary Group Questions

Below BAMx provides its response to one of the questions that were posed by the Plenary Group during the March 16th workshop.

1. **What renewable energy zones in California and across the West may be of most interest to California utilities and developers by the 2030 timeframe?**

Prior to evaluating new transmission, BAMx believes there needs to be better understanding among the policymakers and stakeholders regarding the locations of In-State resources that can be accessed and Out-of-State (OOS) renewable resources that can be imported on the **existing** transmission infrastructure. Such an assessment would involve potentially "repurposing" the existing transmission. One such example would be the Intermountain DC Intertie, an HVDC line owned and operated by the Los Angeles Department of Water and Power (LADWP), which can potentially be used to import OOS renewable resources once the Intermountain coal-fired power plant retires. This same concept could also apply to other retiring coal plants elsewhere in the Western Interconnect. CPUC Commissioner Florio has indicated identifying such reuse or repurpose of the existing transmission as one of the major priorities for the RETI 2.0 efforts.[2]

There is clearly some amount that can be imported over the existing transmission system. The SB 350 study provides some insights in this regards, where it assumes that nearly 3,000 MW of external medium-quality wind and solar resources would be available over the existing

[1] BAMx consists of Alameda Municipal Power, City of Palo Alto Utilities, Port of Oakland, and the City of Santa Clara's Silicon Valley Power.

[2] Commissioner Florio during the September 10, 2015 RETI workshop.

transmission system at the proximity to the existing delivery points into California.[3] BAMx strongly encourages the Plenary Group to take into consideration the findings of the SB350 studies that expected in mid-April 2016, especially scenarios 2 and 3 that consider OOS resources imported on existing transmission.[4]

BAMx is encouraged that the Plenary Group efforts will be informed by the Draft 2016 RPS Portfolios for generation and transmission planning developed by the CPUC Energy Division (ED).[5] In particular, we request the Plenary Group to assign a considerable weight to a WECC-wide RPS portfolio that includes a possible mix of "fully deliverable and energy only" resources, as determined from a least-cost best-fit perspective using the RPS calculator for the following reasons. First, the new version of the Calculator (version 6.2) has the capability to model the Energy Only (EO) resources. Given that 50% RPS is an energy goal and not a resource adequacy capacity one, the EO resources are equally effective in meeting the State's policy goals. Second, BAMx does not see any rationale for applying any artificial restriction to procure only In-State renewable resources. Currently, the RPS Calculator assumes that no existing transmission is available (e.g., new transmission must always be built) to access OOS renewable projects. As mentioned earlier, BAMx believes that OOS renewable resources that can be imported on the existing transmission infrastructure. Therefore, any need for new transmission need identified by the 2016 RPS portfolios need to be compared and contrasted with the SB 350 studies that recognize that OOS resources imported on the existing transmission.

BAMx applauds the CPUC Energy Division's efforts in adding new functionalities to version 6.2 of the RPS Calculator. We are also impressed with the version 6.2 Calculator's ability to allow power to be exported from the CAISO. In contrast, the earlier version of the Calculator assumed no power could be exported. The CAISO has, in the past, imposed a modeling constraint of "no net exports." As the system moves forward with regionalization efforts, further work is required to establish appropriate assumptions on the potential exports in different planning futures. The CAISO's 2015-16 TPP Special Study has clearly demonstrated that net exports are highly effective in addressing over-generation and in reducing the potential renewable curtailments. The SB 350 studies currently underway assume three different levels of net exports: 2,000MW, 5,000MW, and 8,000MW. BAMx urges the Plenary Group to draw upon the RPS portfolios with a realistic level of net exports.

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[3] Draft Renewable Portfolios for CAISO SB 350 Study, slide #23, CAISO Public Workshop, February 8, 2016.

[4] *Ibid.*

[5] See (Staff Portfolios Paper, dated March 9, 2016), which was attached to the March 14, 2016 ALJ Ruling (Rulemaking 15-02-020).

Thank you for the opportunity to comment.

If you have any questions concerning these comments, please contact Joyce Kinnear (jkinnear@santaclaraca.gov or (408) 615-6656).