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April 14, 2016

Mr. Robert B. Weisenmiller, Ph.D.
Chair
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

Subject: 15-RETI-02 (Renewable Energy Transmission Initiative)

Dear Chair Weisenmiller:

Imperial Irrigation District appreciates the opportunity to participate in the RETI 2.0 process. IID lauds the Energy Commission's leadership role in helping California achieve its climate and renewable goals. With respect to the RETI 2.0 process, IID believes the desired outcome should be a result that benefits the entirety of California and its ratepayers. IID provides these comments in advance of the plenary meeting scheduled for April 18, 2016.

IID has been an active participant in the Transmission Technical Input Group in an effort to identify resources in California and the infrastructure required to access the resources. IID has provided technical data into the TTIG process. However, IID is concerned that the study process may not yield the most accurate results based upon recently-discovered information.

On April 6, 2016, IID notified the California Independent System Operator Corporation that it was not using the most updated representation of the IID system. CAISO advised IID that due to the schedule, it was using existing and not updated information. Basically, the CAISO will not study any new generation potential from the IID balancing authority area for the next State of California requirements. Further, CAISO advises there is not sufficient time to conduct new studies; instead, it will rely on existing studies. Those existing studies may not contain the most current and relevant information and are not likely to provide accurate guidance to the RETI 2.0 process. A meaningful analysis requires up-to-date information from relevant and impacted entities. IID would like to point out that its service territory covers 98 percent of the Imperial Competitive Renewable Energy Zone. The Energy Commission may wish to provide direction with respect to the study process.

Finally, IID remains concerned regarding the continued focus on accessing out-of-state renewables. A more focused look at existing, available transmission and shovel-ready resources located in-state may provide an interim measure toward achieving RPS compliance obligations resulting in cost savings to California ratepayers.

IID looks forward to continued participation in the RETI 2.0 process and appreciates the opportunity to provide these comments.

Sincerely,



Vicken Kasarjian
Energy Manager

- cc: Kevin Kelley, General Manager, IID
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