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Docket Number:	15-RETI-02
Project Title:	Renewable Energy Transmission Initiative 2.0
TN #:	211288
Document Title:	David Getts Comments: SWPG Comments on April 18, 2016 RETI 2 Plenary Workshop
Description:	N/A
Filer:	System
Organization:	David Getts/ SouthWestern Power Group
Submitter Role:	Other Interested Person
Submission Date:	4/29/2016 9:44:26 AM
Docketed Date:	4/29/2016

Comment Received From: David Getts

Submitted On: 4/29/2016

Docket Number: 15-RETI-02

SWPG Comments on April 18, 2016 RETI 2 Plenary Workshop

Additional submitted attachment is included below.

Date: April 29, 2016

To: California Energy Commission

Docket No. 15-RETI-02

April 18, 2016 Renewable Energy Transmission Initiative 2.0 Plenary Group Preliminary Work Meeting

From: David Getts, SouthWestern Power Group

SWPG offers the following comments following the Plenary Group's April 18, 2016 working group meeting

First, we generally support the comments submitted by David Smith of TransWest Express on 4/22/2016

Continuing to Consider Renewable Rich Areas in NM and WY Is Beneficial

SWPG appreciates the discussion at the April 18, 2016 meeting of possible renewable areas and Super CREZ's. SWPG encourages the RETI Plenary group to maintain focus on the flexibility offered by a distribution of renewable areas. Diversity and cost effectiveness benefits are possible from considering regional solutions, and many analyses, and both the ISO Special Study and the CPUC RPS studies show that considering out of state wind can result in lower cost and lower curtailment of renewables, for example. Maintaining focus on these renewable-rich areas will ensure a selection of potential transmission projects that will continue to provide for diversity in sourcing renewables.

SWPG Recommends that the RETI 2.0 Group Consider and Clarify the Objectives of the use of the TAFAs and Consider Extending the TAFAs to NM and WY

The RETI group is considering both renewable areas and Transmission Assessment Focus Areas (TAFAs). At this point, the role of the TAFAs is not entirely clear. Given that the CPUC RPS calculator tries to minimize the overall transmission and renewable procurement costs, it is not clear if the TAFAs are intended to simply minimize transmission costs or if the TAFAs will be otherwise used differently. To the extent the TAFAs help identify upgrades that are cost effective rather than seen as fixed in the RPS calculator, then the concept of the TAFAs may be beneficial. However, SWPG would discourage RETI 2.0 from selecting TAFAs solely to minimize the costs of the CAISO transmission upgrades irrespective of renewable costs or benefits.

Further, it is unclear why the TAFAs would not extend into renewable areas outside of California. Although transmission projects outside of the ISO's footprint may not necessarily be built by the

CAISO, it nevertheless likely will be constructive to include such TAFE's in the RETI 2.0 field of view.

Third-Party Development to Date has Reduced Many of the Out of State Transmission Risks

There was at least one comment in the April 18th meeting that out of state transmission projects may not be feasible, in particular if they cross state boundaries and thereby may create substantial permitting challenges. However, as has been discussed in prior Plenary meetings, there are several out of state projects that have made significant progress in their development such that they can be built and commence service within the next 5 years.. Most of the permitting challenges and aspects of regulatory uncertainty have already been overcome by these projects, such as SunZia and TransWest Express. Such out of state projects should not be discounted because they begin with significant challenges. Rather, California can leverage the work that has been completed by private development money in considering these projects as part of California's renewable solution.

SWPG thanks you for your consideration of our comments.