

## DOCKETED

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**Conservation Organization comments on April 18 Plenary Group Meeting**

*Additional submitted attachment is included below.*



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Subject: Comments on Renewable Energy Transmission Initiative 2.0 Plenary Group Meeting (April 18, 2016)

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## **I. Introduction and Summary**

The Nature Conservancy, Defenders of Wildlife, Sierra Club, Natural Resources Defense Council, Audubon California, California Native Plant Society, The Wilderness Society, and the Center for Biological Diversity (“Conservation Organizations”) respectfully submit these comments to the Renewable Energy Transmission Initiative (RETI) 2.0 Plenary Group Meeting, held on April 18, 2016.

We strongly support the ongoing work of the California Governor’s Office, California Natural Resources Agency (CNRA), the California Energy Commission (CEC), the California Public Utilities Commission (CPUC), the California Independent System Operation (CAISO),

and the Bureau of Land Management (BLM) to align renewable energy development and transmission planning with natural resource protection. RETI 2.0 presents an opportunity to coordinate these processes<sup>1</sup> through the Data Basin platform in support of a sustainable, low carbon energy future.

Achieving a low carbon energy future is critical for California – for our economy, our communities and the environment. Key to this future is not only rapidly decarbonizing the energy and transportation sectors, but also protecting and managing the natural and working lands that provide for conservation of species and habitat along with important co-benefits such as sequestering carbon<sup>2</sup> and protecting water quality and supply.

## II. Plenary Group – Discussion Questions

As follows, the Conservation Organizations respond to several of the discussion questions raised in the April 18 Plenary Group Meeting.

### a. Discussion Question – “Based on these studies [presented on panel at Plenary Group meeting] and prior information, where should RETI 2.0 focus in examining transmission options and implications?”

Three geographies emerged from the studies presented during the panel: the San Joaquin Valley, Imperial County, and the Desert Renewable Energy Conservation Plan (DRECP) Planning Area. Given that these regions have been identified in multiple resource studies, they should be a focus in examining transmission options and implications through the RETI 2.0 process.

It is important to note that these geographies have consistently been elevated in workshops and working group meetings since the inception of RETI 2.0 last summer. The mounting scientific evidence brought forth at the most recent Plenary Group Meeting indicates that these regions are important to prioritize for study in RETI 2.0. All three have significant renewable energy potential. Even more important, each area has been studied in considerable detail (in DRECP, Imperial County planning, and the Solar and the San Joaquin Valley project) to identify lower-conflict lands that avoid key species and habitat impacts and are suitable for renewable energy development. By contrast, many if not most of the other areas under consideration have not been analyzed in detail for either renewable energy potential or to identify lower-conflict locations suitable for development. By going first to already identified lower-conflict locations, RETI 2.0 can create and detail a

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<sup>1</sup> Examples of processes include, but are not limited to: San Joaquin Valley Solar Convening (which will be released as final report on May 10, 2016), CPUC’s Long Term Procurement Plan, CPUC’s RPS Calculator, CAISO Transmission Planning Process, Integrated Energy Policy Report, Desert Renewable Energy Conservation Plan (Phase I and Phase II), and local planning efforts for renewable energy and conservation.

<sup>2</sup> [http://www.arb.ca.gov/html/fact\\_sheets/nwlfactsheet.pdf](http://www.arb.ca.gov/html/fact_sheets/nwlfactsheet.pdf)

vision for developing more renewable energy, at lower cost and in less time than opening up new areas that lack this analysis.

**b. Discussion Question – “Is the proposed Transmission Assessment Focus Area (TAFAs) approach appropriate for guiding the next phase of the RETI 2.0 project?”**

The proposed Transmission Assessment Focus Area (TAFAs) approach identified at the meeting utilizes many information sources<sup>3</sup>, but what remains unclear is how these resources, or criteria, were ranked and/or weighted to arrive at the preliminary focus list of eleven (11) Super Competitive Renewable Energy Zone (CREZ)-based TAFAs, and three (3) interconnections.

For a number of reasons, including that the RETI 2.0 schedule allows for only two months of evaluating environmental implications and transmission implications<sup>4</sup>, we strongly recommend a *prioritization* of the TAFAs to focus resources and capacity on the best regions for examining transmission options and implications moving forward.

We believe that the following criteria should be employed in TAFAs prioritization:

- 1) First, renewable resource potential has been identified in multiple studies, and commercial interest is evident (using CAISO Interconnection Queue data) – an established science baseline for energy;
- 2) Second, public and/or private investments have been made in developing ecological and conservation planning data – an established science baseline for conservation;
- 3) Third, there are science-based planning processes at the landscape scale upon which RETI 2.0 can build: an agency-led or stakeholder-led science-based planning process has occurred and has identified suitable low-impact locations for the development of renewable energy resources.

The addition of these criteria will direct the RETI 2.0 planning process towards focal geographies that are ripe for further exploration of transmission options and implications. As noted during the panel, when applied these criteria elevate the San Joaquin Valley, Imperial County, and the Desert Renewable Energy Conservation Plan Planning Area. Further study of these geographies is a smart investment of resources and time, and will leverage the significant public and private investments that have already been made in data collection, analyses, and planning.

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<sup>3</sup> Turner, B. (2016) *Transmission Assessment Focus Areas – Introduction and Next Steps*, slide 7. [PowerPoint Presentation].

<sup>4</sup> Turner, B. (2016) *Transmission Assessment Focus Areas – Introduction and Next Steps*, slide 4. [PowerPoint Presentation].

In contrast, a number of the other Super CREZ-based TAFAs do not have the same enabling conditions and baseline of information, and are premature to study, especially given the ambitious RETI 2.0 planning timeline. Just a few of the problems entailed include that some lack adequate transmission, lack demonstrated commercial interest<sup>5</sup>, or involve known high-conflict species, habitat, or ecosystem processes (three examples of the latter include grey wolf habitat, sage grouse habitat, and migratory pathways, including critical locations on the Pacific Flyway).

Finally, the various studies presented at the workshop identified a wide range of capacity projections for 2030, roughly 15 and 24 gigawatts (GW). Using these projections, the three TAFAs we recommend to be prioritized, if transmission is made available where needed, can easily accommodate new development that may be needed above existing and planned renewable generation facilities. During the same time period, landscape-scale planning can be undertaken to identify appropriate lower-conflict areas in other Super CREZs to address remaining needs, if any, for large-scale renewable energy development between 2030 and 2050.

For these reasons, the RETI 2.0 planning process should prioritize the TAFAs, and specifically should place the TAFAs within the San Joaquin Valley, Imperial County and DRECP Planning Area as the top priorities, before spending the time and resources to evaluate transmission and environmental implications for all of these TAFAs, which would far exceed California's expected need.

### **III. Conclusion**

We appreciate the opportunity to participate in this process. RETI 2.0 presents an opportunity to create a vision for rapidly decarbonizing the electricity sector while protecting the natural and working lands that provide for the conservation of species and habitat as well as other important co-benefits such as carbon sequestration.

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<sup>5</sup> For example, in the *Transmission Assessment Focus Areas – Introduction and Next Steps* presentation, the Sacramento Valley Super CREZ was noted to have only 167 MW of new capacity proposed in the CEC Project Database and no new capacity in the CAISO Queue (slide 11). As compared to Greater Imperial commercial interest data: 3,052 MW of new capacity in the CAISO Queue, and 2,140 MW in the CEC Project Database (slide 12).

Respectfully submitted,



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