

## DOCKETED

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*Comment Received From: Jason Smith*

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**TransCanyon's Comments - RETI 2.0**

*Additional submitted attachment is included below.*



May 2, 2016

RETI 2.0 Plenary Group  
California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814-5512

Re: Renewable Energy Transmission Initiative (“RETI”) 2.0

RETI 2.0 Plenary Group:

TransCanyon, LLC (“TransCanyon”) appreciates the opportunity to provide comments on specific questions posed during the April 18, 2016, Plenary Group meeting. TransCanyon provides these comments on the following questions.

**1. What conclusions can be drawn from long-term renewable resource portfolios about the kinds of resources that may be important for California utilities to procure by 2030?**

In general, resource portfolios are driven by assumptions regarding deliverability and regionalization and appear reasonable. However, within California, environmental constraints/costs and practical resource potential may restrict in-state options more severely than some portfolios assume.

**2. What lessons about the role of transmission can we learn from the studies?**

While there is some uncertainty about the details, broadly speaking California needs to position itself to develop local resources economically where practical from an environmental and cost perspective, while also taking steps to increase its ability to access regional resources. As several others have noted, establishing a path for doing so with enough lead time to implement longer-lead time solutions is critical.

**3. Based on these studies and prior information, where should RETI 2.0 focus in examining transmission options and implications?**

With respect to energy-only scenarios, RETI 2.0 should consider the potential for additional transmission needs to address the economic impact of congestion that could be exacerbated by significant in-state resource expansion that is not couple with deliverability upgrades.

Where potential portfolios include out-of-state resources, RETI 2.0 should consider the relative regional benefits of different resource and transmission options, recognizing that those benefit levels will directly impact the cost and viability of regional solutions.

Finally, as noted during the presentation, in-state and out-of-state transmission approaches that provide optionality (i.e. deliver value to a variety of stakeholders under a variety of potential scenarios) should be prioritized. This may require developing a framework for quantifying or otherwise valuing such optionality that can be used by transmission planners to determine the benefits associated with such solutions.

**4. Is the proposed Transmission Assessment Focus Area approach appropriate for guiding the next phase of the RETI 2.0 project?**

TransCanyon supports the approach and looks forward to further discussion and analysis of the identified areas.

TransCanyon appreciates the opportunity to submit these comments and looks forward to continued participation and engagement in this effort.

Sincerely,



Jason R. Smith

*TransCanyon, a joint venture between Berkshire Hathaway Energy's subsidiary, BHE U.S. Transmission and Pinnacle West Capital Corporation's subsidiary, Bright Canyon Energy, is an independent developer of electric transmission infrastructure for the western United States.*