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WSP comment to April 18, 2016 RETI 2.0 Plenary Group Meeting

Additional submitted attachment is included below.



Submitted online on May 2, 2016

RE: Westlands Solar Park LLC comments to docket #15-RETI-02 Plenary Group meeting on April 18, 2016 regarding Transmission Assessment Focus Areas

The Westlands Solar Park (WSP) appreciates the opportunity to comment on the April 18, 2016 RETI 2.0 Plenary Group meeting on Transmission Assessment Focus Areas. The notice for the plenary group meeting highlighted the following issues (questions) to be answered in the meeting.

- What quantities of which renewable resource (and from the geographically) are assumed in the models' energy scenarios?
- What lessons about the "fit" of different resources can we learn from the different scenarios? What aggregate metrics of "fit" are used to measure different portfolios of resources?
- Are there lessons about complementarity of resources in certain combinations? Are there insights about the complementarity of renewable generation profiles in some areas with electric demand in others?
- What lessons about the role of transmission can we learn from the studies? Where is the existing system capable of integrating new renewables, where is new transmission necessary to access resources, and where does new transmission integrate multiple renewable resource areas and/or demand centers?
- Based on these studies and prior information, where should RETI 2.0 focus in examining transmission options and implications?
- Is the proposed Transmission Assessment Focus Area approach appropriate for guiding the next phase of the RETI 2.0 project?

The WSP is a strong supporter of RETI 2.0 mission to explore renewable generation resources in California and the West, identify land use and environmental opportunities and constraints to accessing these resources, building understanding of transmission options and support least regret transmission pathways and inform future planning and regulatory proceedings.

Specifically, the areas that WSP would like RETI 2.0 to prioritize are the San Joaquin and Westlands Water District for additional transmission planning to meet California's higher RPS goals. In the San Joaquin and specifically the Westlands Water District, widely considered a least regret area, there is 6,500 MW of planned and developed solar generation. The San Joaquin and the Westlands Water District has existing transmission corridors that can be utilized and expanded to support larger amounts of renewable energy delivers to southern and northern California as well as potential out of state export opportunities as the western region

transitions from coal to natural gas and renewable energy. Furthermore, the San Joaquin is strategically positioned to utilize grid storage opportunities through large scale pump hydro at PG&E's Helms facility in Fresno, compressed air energy storage (CAES) projects in Kern county and lithium ion battery storage in Fresno and Kings counties that can help with balancing the grid during over generation periods and provide critical ancillary services.

There are large areas of the San Joaquin that can be converted to utility scale solar generation due to pre-existing impairment of the farmland from large scale agricultural and combined with the lack of a drainage system to move contaminated irrigation water to the ocean. Furthermore, there is lower risk of stranding transmission investment in the central valley since Path 15 and Path 26 will need to be upgraded if California wants to have a robust regional grid and the inevitable increase of renewable generation flows from the desert south to northern CA and eventually all the way to the northwest will trigger congestion along the major transmission pathways in the central valley. Since transmission planning and permitting is a slow process in California we should be future proofing the backbone of the grid now versus waiting until the costs are higher and the permitting more difficult.

In conclusion the WSP supports further studies of transmission capacity in the San Joaquin and specifically the Westlands Water District for purposes of delivering thousands of megawatts of in state utility scale renewable generation to southern and northern California from an area that is underserved and in need of more renewable energy jobs.