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Comments by the Transmission Agency of Northern California in the RETI 2.0 process

Additional submitted attachment is included below.



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Comments in the RETI 2.0 Process May 16, 2016

The Transmission Agency of Northern California (TANC) appreciates the opportunity to provide comments on the current Renewable Energy Transmission Initiative (RETI) 2.0 process following the May 2, 2016 Plenary Group Meeting. TANC was formed in 1984 as a joint powers agency to plan, develop, or contract for transmission facilities in a coordinated manner for our 15 publicly-owned utility (POU) Members. TANC assists its POU Members in providing cost-effective energy supplies to their customers, through long-term ownership or contracts for service over high-voltage transmission lines within California and the western United States. TANC is the principal owner and the Project Manager of the California-Oregon Transmission Project (COTP) a 340-mile 500-Kilovolt (kV) alternating current (AC) transmission line between Southern Oregon and Central California. The COTP is a prime example of coordinated joint inter-regional transmission planning. The COTP Participants, California utilities, and parties in the Pacific Northwest spent considerable time and efforts in the planning, study, and ultimate development of the COTP and the third Northwest Intertie in the Pacific Northwest; combined these facilities increased the transfer capability between the two regions by over 50 percent and significantly increased reliability in the Western Electricity Coordinating Council (WECC) region. The COTP and the other 500-kV facilities in Northern California (the Pacific AC Intertie) comprise the California-Oregon Intertie (COI) which is critical for promoting interstate commerce, the bi-directional transfer of clean (greenhouse gas free) and economic energy, and which will be critical for meeting California's future energy and climate change goals.

TANC was an active participant in both the initial RETI process that began in 2007 and the California Transmission Planning Group (CTPG) that was formed from the RETI process. TANC is currently an active participant in the Transmission Technical Input Group and is monitoring the developments of the Environmental and Land Use Technical Group and the Plenary Group. TANC's interest in the process is to ensure that decisions made in the RETI 2.0 process recognize the critical and important role of existing facilities and that any new decisions or proposals do not negatively impact or degrade the existing California electric grid, particularly the transfer capability of the COI, including the COTP.

The May 2, 2016 presentation entitled "Update on Existing Transmission Capability for Renewable Resources" made reference to a comment from TANC stating that "Energy-only resources in the Sacramento Valley could interconnect to the COTP." While TANC agrees that there is the potential for some energy-only renewable resources to interconnect to the COTP (and other facilities in Northern California), it is important to note that existing data shows that

the COI is historically one of the most congested paths in the WECC. TANC asserts that any studies being considered in the RETI 2.0 process should reflect such. The potential for increased congestion needs to be fully considered in determining potential locations and amounts of renewable resources. In addition, it is critical to understand how the scheduling of potential energy-only resources and the curtailment of such to minimize impacts on heavily loaded, jointly owned paths (such as the COI) will be implemented.

With respect to the above, the May 2, 2016 presentation entitled “Transmission Assessment Focus Areas Introduction, Proposed List, and Next Steps” presented information regarding renewables development in Northern California which noted that:

- There would be “Significant overlap with CA-OR Intertie issues & access to Northwest renewables”.
- There could be approximately 2,100 MW of “energy-only” transmission capacity for resources in the Sacramento River Area and 1,250 MW of such transmission capacity for energy-only resources located in the Lassen and Round Mountain Areas.

Based on the fact that the COI has exhibited high congestion over the past several years it seems to TANC that the above estimates likely overstate the amounts of capacity available. As a result, TANC has requested the California Independent System Operator’s input as to the underlying assumptions (such as COI flows and the amounts of hydroelectric generation assumed to be on-line) that were utilized in developing the above estimates.

Also, while full scheduling rights on the COI are 4,800 megawatts (MW); it is frequently unavailable at the full 4,800 MW scheduling limit due to various system conditions (such as facilities out for maintenance and hydro conditions in Northern California). TANC believes and is supportive of studies that will strive to maximize the transfer capability on the COI, including the COTP.

TANC is also supportive of the consideration of a wide geographic range for the location of renewables. There is a strong need to consider both the diversity of geographic location and the diversity of type in the consideration of renewable resources needed to meet future goals. Historically, new in-state renewable development has been located in the southern portion of California and south of the Tehachapi Mountains. Favoring renewable development in the southern portion of the state has the potential to result in over generation challenges. During the past two spring seasons, California has experienced congestion into northern California from both the Pacific Northwest (Path 66) and from southern California (Path 15). This suggests that the RETI 2.0 process should consider not only regional diversity for new renewables but also an assessment of potential modifications to increase transfer capability into (and out of) northern California. For any new transfer capability, TANC supports the use of upgrading existing facilities and rights-of-way (ROW), prior to building in new ROWs.

TANC supports further study of the Northern California and San Joaquin Valley Transmission Assessment Focus Areas for potential renewable resource development. As the RETI 2.0 process moves forward it is also important that that ability to import out-of-state resources (including the hydroelectric and wind resources in the Pacific Northwest) not be diminished for California to meet its post-2020 and post-2030 objectives enhanced.

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