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SWPG Comments on June 13, 2016 RETI 2.0 Transmission Technical Input Group Workshop

Additional submitted attachment is included below.

To: California Energy Commission
Docket No. 15-RETI-02
June 13, 2016 Renewable Energy Transmission Initiative 2.0 Transmission Technical Input
Group Workshop

From: David Getts, SouthWestern Power Group

Date: June 20, 2016

SWPG appreciates being able to participate in the June 13, 2016 Transmission Technical Input Group (TTIG) meeting. We particularly commend the agencies for their focus on getting additional input on how policy decisions (such as EO vs FCDS) will affect out-of-state transmission assumptions. In our view, a balanced resource portfolio offers planning benefits, and the TTIG should continue to make transmission assumptions factoring in such benefits, rather than exclusively relying on model outputs. In addition to including different *types* of renewable resources, *geographical* diversity will provide a more robust resource plan. Reasonably large amounts of wind energy from Wyoming and New Mexico will continue to make sense under all future scenarios, given the 50% renewable need and decreasing returns to in-state renewable development.

The effect on transmission of needed out-of-state renewable generation is that new transmission will be required in all future scenarios. Currently, there is essentially no remaining available transfer capacity (ATC) of any scale from New Mexico to Arizona or California. ATC westbound from Four Corners has been contracted for. Similarly, there is no ATC showing westbound on Path 47 between southern New Mexico and Southern Arizona. Thus, new transmission and/or significant upgrades of existing facilities are necessary to deliver New Mexico wind energy to California. We believe this will be the case whether or not the CAISO expands its footprint through integration with Pacificorp and other utilities. It is clear that new transfer capacity is required to enable exports of renewable energy to and from New Mexico. A project like SunZia will enable an additional 3,000 MW of New Mexico wind energy to flow westbound to Arizona and California and will similarly improve New Mexico's import capacity.

There are three import/export paths that are important for enabling further energy transfers with the southwest: (1) Eldorado Valley to SoCal, (2) Palo Verde to Colorado River/Devers and (3) Palo Verde to North Gila to Imperial Valley. Based on a 15 to 20 year planning outlook, California and Arizona will benefit if the transfer capacity of all of these import/export paths are increased. The combination of import/export path increases and additional new transmission facilities will lead to New Mexico easily being able to provide another 5,000 MW of economical wind energy to Arizona and California.

Questions for the Western Interstate Energy Board (WIEB)

RETI 2.0 has requested that the WIEB conduct a short regional consultation. The intent is to summarize the existing, planned, and potential capability of the out-of-state transmission network to deliver renewable energy to California, to deliver California excess renewables to western load centers, and to support more renewable energy trading across the west generally.

We would add the following questions:

- What is the capability of existing, planned, and potential renewable resources outside of California to serve external load pockets?
- How much of this transmission will be used to serve non-California load and how much can be used to import resources into CA? How will this change over time of day?
- What is the relative efficiency/use of existing, planned, and potential transmission facilities? Is there a certain region that has consistent flows rather than high use during one time of day and low use during another? (This gets to the benefit of diversifying renewable types and locations.)

SWPG would be pleased to answer any questions or provide additional information that might assist in the TTIG's efforts. Please do not hesitate to contact me at (602) 808-2004 or dgetts@southwesternpower.com.

Thank you for your consideration of these comments.