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Pacific Gas & Electric Comments on August 15 RETI 2.0 Workshop

Additional submitted attachment is included below.

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**POSTED ELECTRONICALLY TO
DOCKET 15-RETI-02**California Energy Commission
Dockets Office, MS-4
Docket No. 15-RETI-02
1516 Ninth Street
Sacramento, CA 95814-5512Re: Docket 15-RETI-02: Pacific Gas and Electric Company Comments on the August 15, 2016 Joint Agency Workshop for the Renewable Energy Transmission Initiative 2.0

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to provide comments on the August 15, 2016 Joint Agency Workshop of the Renewable Energy Transmission Initiative (RETI) 2.0, hosted by the California Public Utilities Commission (CPUC), California Energy Commission (CEC), and California Independent System Operator (CAISO). PG&E provides comments on the following topics in response to the updates provided by RETI 2.0 staff at the August 15 workshop:

- Energy-Only Transmission Capability Estimates
- Transmission Technical Input Group (TTIG) and Environmental and Land Use Technical Advisory Group (ELUTAG) study area alignment and clarification
- RETI 2.0 alignment with formal regulatory planning processes.

I. *Energy-Only Transmission Capability Estimates*

PG&E supports the Transmission Technical Input Group (TTIG) studying estimates of energy-only transmission for each Transmission Assessment Focus Area (TAFA) in the RETI 2.0 proceeding. PG&E agrees that RETI 2.0 should explicitly consider how the development of energy-only RPS resources might affect the need for new transmission to meet the 50-percent Renewables Procurement Standard (RPS) goal.

PG&E is encouraged and appreciative of the TTIG's efforts in this regard. As mentioned during the August 15th TTIG presentation, energy-only transmission generally leads to faster and less expensive resource interconnection. RETI should continue to examine how cost-effective deployment of energy-only resources can reduce the costs and potential environmental concerns associated with new transmission development. Additionally, recent runs of the RPS Calculator for 50-percent RPS in 2030 indicate minimum additional transmission needs if new renewable resources are allowed to be energy-only, results generally validated by the CAISO's 2015-2016 Transmission Planning Process (TPP) Special Study. PG&E agrees that the TTIG's examination of the amount of existing energy-only transmission capacity and whether such capacity is sufficient to achieve a 50-percent renewable requirement will provide valid and important inputs into the final RETI 2.0 report.

Accordingly, PG&E recommends that the summary RETI report developed by the Plenary Group reflect the TTIG findings and explicitly compare the estimated transmission needs and costs between energy-only and fully-deliverable scenarios.

II. *TAFAs Alignment Between Study Groups Should be Explicitly Addressed in the Final RETI 2.0 Report*

The Environmental and Land Use Technical Advisory Group (ELUTAG) has indicated that it will potentially study only parts of each TAFAs surrounding “project clusters,” as opposed to examining the environmental implications of renewable and transmission development throughout an entire TAFAs. From the ELUTAG’s meeting on July 22, 2016, PG&E understands the motivation for this change to not necessarily be a reflection of a change in policy or objective of the RETI 2.0 process. Explanatory language should be included in the final RETI 2.0 report to clarify that the lack of environmental study in parts of the TAFAs that are not surrounding current or currently-proposed project clusters does not have a bearing on the availability and applicability of that land for renewable development from an environmental perspective. This will enhance the utility of the report by avoiding possible misinterpretations by readers.

As noted by staff at the August 15 workshop, staff did not find it necessary to adjust TAFAs-specific resource planning ranges guiding the TTIG transmission estimates as a result of the ELUTAG’s reduced geographic scope. It is essential for the final RETI report to be explicit about why an adjustment to align TTIG and ELUTAG study areas was unnecessary.

III. *RETI 2.0 Best Informs the Regulatory Planning Process via the RPS Calculator*

PG&E continues to believe that the non-regulatory RETI 2.0 process will best feed into the formal regulatory planning proceedings by providing updated data for the RPS Calculator. For example, RETI can refine the in-state and out-of-state transmission Available Capacity estimates used in the RPS Calculator and provide more granularity with varied levels of renewable resources (e.g., ranging from an “existing” or “studied” case to an exploratory case). An estimate of out-of-state resources that can deliver into the CAISO using existing transmission is a key missing data point in the RPS Calculator currently; PG&E urges that the RETI 2.0 Western Outreach Project focus on filling this void. Since the Calculator provides least-cost best-fit based portfolios as scenarios, RETI could thus inform the scenarios for the Long Term Procurement Planning/Integrated Resource Planning processes and TPP via the RPS Calculator.

In contrast, using the transmission upgrades identified in the RETI 2.0 report as a direct input into the TPP would not be effective given that RETI is meant to be a targeted look at the proposed TAFAs rather than a least-cost based portfolio development tool for transmission planning. Additionally, from an inclusive public policy perspective, having RETI information feed into the RPS Calculator allows for vetting of the use of RETI information in a formal regulatory setting.

IV. *Conclusion*

PG&E appreciates this opportunity to comment on the August 15th Workshop for RETI 2.0 and looks forward to continued participation in this process.

Sincerely,

/s/

Nathan Bengtsson