

DOCKETED

| | |
|-------------------------|---|
| Docket Number: | 15-RETI-02 |
| Project Title: | Renewable Energy Transmission Initiative 2.0 |
| TN #: | 213020 |
| Document Title: | Conservation Parties Comments on August 15, 2016 RETI 2.0 Joint Agency Workshop |
| Description: | N/A |
| Filer: | System |
| Organization: | Conservation Parties |
| Submitter Role: | Public |
| Submission Date: | 8/29/2016 3:35:58 PM |
| Docketed Date: | 8/29/2016 |

Comment Received From: Conservation Parties

Submitted On: 8/29/2016

Docket Number: 15-RETI-02

Conservation Parties Comments on August 15, 2016 RETI 2.0 Joint Agency Workshop

Additional submitted attachment is included below.



To: Dockets Unit
California Energy Commission
Docket No. 15-RETI-02
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512
docket@energy.ca.gov

From: Kim Delfino, Defenders of Wildlife
Erica Brand, The Nature Conservancy
Sarah Friedman, Sierra Club

Date: August 29, 2016

Subject: Comments to Renewable Energy Transmission Initiative 2.0 Joint Agency
Workshop (August 15, 2016)

Docket Number: 15-RETI-02

Via Electronic Mail

Dear RETI 2.0 Leadership Team:

Last year, the Renewable Energy Transmission Initiative (RETI) 2.0 leadership team launched this initiative to explore new transmission to meet the needs of an increasingly carbon-free California economy.¹ Defenders of Wildlife, The Nature Conservancy, and the Sierra Club (Conservation Parties) strongly support the work of the RETI 2.0 regulatory agencies, leadership team, and planning team to align renewable energy development and transmission planning with natural resource protection.

Since that time, our organizations have participated in many public workshops to examine a host of issues related to RETI 2.0; the joint agencies have held workshops to explore the relative renewable resource potential associated with various locations within California; and the Transmission Technical Input Group (TTIG) and the Environmental and Land Use Technical Group (ELUTG) have held meetings to explore transmission implications and environmental implications, respectively.

While RETI 2.0 has made significant progress in aggregating information from across existing studies and multiple regulatory planning processes, there remain important

¹ http://www.energy.ca.gov/reti/reti2/documents/2015-07-30_Letter_to_CAISO_RE_RETI_2_Initiative_from_CEC_and_CPUC.pdf

unresolved questions and issues that should be addressed in the ELUTG analysis for the forthcoming RETI 2.0 report. The paragraphs below address several issues: alignment with California’s climate goals, locations to be eliminated from consideration, and locations to be evaluated/prioritized.

1. Climate Goals

The most recent State analysis of energy needed to meet California’s 2030 Renewable Portfolio Standard (RPS) target identifies 3,000-7,000 MW² of new utility scale renewable capacity. The various studies presented through RETI 2.0 Plenary Group meetings identify a wide range of capacity projections for 2030, roughly 15 and 24 gigawatts (GW).³ Although we recognize that the California Air Resources Board (CARB) is still determining the energy sector reductions necessary to meet the SB 350 GHG goals, the amount of hypothetical resource under consideration by TTIG (40,000 MW⁴) is greater than the needed capacity, even if the energy sector assumes all of the SB 350 GHG goals. As such, California may be selective in approving areas for new utility-scale renewable development to avoid unnecessary impacts to our finite natural and working lands. There is no reason to promote development in areas of high natural resource value when there are plenty of low conflict locations to meet and exceed the state’s RPS and GHG targets. Indeed, developing in areas of high natural resource value will move us backwards on other state policies, such as protecting and managing lands for carbon sequestration, water protection, and habitat protection.

2. Locations that could be eliminated or marked low priority

It is our understanding that the blue polygons in the RETI Transmission Assessment Focal Areas (TAFA) base map represent areas of anticipated renewable energy development based upon existing and proposed projects. Per our July 28, 2016 letter,⁵ we remain deeply concerned about an approach that relies on previous, frequently highly impactful, projects to plan for future development, and we continue to recommend that RETI 2.0 look at areas previously identified in a planning process. Moreover, in our review of the project clusters identified as blue polygons in the RETI base map, we have identified significant factual flaws, with several clusters that were drawn around previously proposed projects that no longer exist. These withdrawn/expired project applications are listed in Appendix A. We

² See RPS Calculator final portfolios presentation, total generic buildout, slide 9, accessed online at the following URL: http://docketpublic.energy.ca.gov/PublicDocuments/15-RETI-02/TN211085_20160415T093947_41816_Meeting_Presentation_by_Forest_Kaser_Revised.pptx

³ See several independent estimates of 2030 renewable net short:
Low Carbon Grid Study: http://lowcarbongrid2030.org/wp-content/uploads/2016/01/1601_Low-Carbon-Grid-Study-Analysis-of-a-50-Emission-Reduction-in-CA.pdf
E3 Pathways study: https://ethree.com/public_projects/energy_principals_study.php
UCS Plexos Study: <http://www.ucsusa.org/clean-energy/california-and-western-states/achieving-50-percent-renewable-energy-in-california#.VuHSxvkrKUI>

⁴ See July 29 TTIG presentation, slide 8 accessed online at the following URL:

http://docketpublic.energy.ca.gov/PublicDocuments/15-RETI-02/TN212495_20160728T151856_Transmission_Technical_Input_Group_Update.pdf

⁵ See Conservation Parties July 28, 2016 Comment Letter regarding the July 21, 2016 RETI 2.0 ELUTG Meeting

find this data quality issue concerning, and we recommend that the project lists should undergo a thorough quality assurance review, including cross-checking the status of projects between agencies such as the CEC and the BLM. BLM applications that have been withdrawn should be reflected and removed from the CEC project list.

We continue to recommend that the Sacramento River Valley should not be designated as a priority focus area, a point shared by other parties.⁶ Therefore, we recommend that project clusters and “RETI 2.0 selected wind projects” in this TAFE be eliminated/deprioritized. This area is a low priority for consideration due to insufficient environmental planning work products (there is nothing comparable to the Desert Renewable Energy Conservation Plan (DRECP) or San Joaquin Valley Least Conflict Solar Study in this area). Additionally, the project lists show very low levels of commercial interest in the Sacramento River Valley. Further study of potential renewable development in the Sacramento River Valley area may be postponed until better environmental planning studies from other proceedings or processes become available for this region.

3. Locations to be evaluated or prioritized

We note that most of the existing project clusters as currently drawn do not overlap with the areas that have been identified in public stakeholder planning processes⁷ as suitable low-impact locations for the development of renewable energy resources. A desired outcome of the RETI 2.0 initiative would be identification of the backbone (bulk system) upgrade implications of interconnecting renewable generation facilities within these defined areas; we recognize that upgrades to local level systems will largely depend on the specific locations of future projects. As such, we recommend that the current clusters should not be used, and new clusters should be drawn around final DRECP Development Focus Areas within the TAFAs that overlap with DRECP planning area and around renewable energy overlays that have been identified in the county planning process.⁸ At this time, a project cluster/polygon is not needed for the North of Kramer DFA, as the DFA is not available for development until further planning is completed.⁹ In the San Joaquin Valley TAFE the project clusters should be redrawn to reflect the lands identified as least conflict by the San Joaquin Least Conflict Solar Study.

All other project clusters outside of these areas should be eliminated as they are not consistent with these public planning processes.

We recommend that transmission upgrade costs should be evaluated and made publicly available for the priority clusters, including the hypothetical clusters noted above. This information will help state and federal agencies understand the infrastructure investments

⁶ See, May 2, 2016, Comments of the Large-scale Solar Association (LSA) on the April 18, 2016 RETI 2.0 Plenary Group Meeting.

⁷ Such as the DRECP, County-led planning processes, and the San Joaquin Valley Least Conflict Solar Study

⁸ See Imperial County Renewable Energy & Transmission Element: <http://www.icpds.com/?pid=833>

⁹ See DFA-VPL-BIO-IFS-6; DRECP Proposed LUPA and Final EIS, Vol. II, pg. II.3-246

that may be needed to fully implement these planning processes; identifying these implications is an important first step in catalyzing action.

Conclusion

Transmission is a key condition for enabling the large-scale development of renewable power needed to meet the state’s long-term climate goals. Thoughtful and transparent planning can direct this investment towards the places where renewable energy development provides multiple benefits and enable the success of landscape-scale planning efforts at the local, state, and federal levels.

We appreciate the opportunity to participate in this process. RETI 2.0 presents an opportunity to create a vision for rapidly decarbonizing the electricity sector while protecting the natural and working lands that provide for the conservation of species and habitat as well as other important co-benefits such as carbon sequestration.

Respectfully submitted,



Erica Brand
California Energy Program Director
The Nature Conservancy
ebrand@tnc.org



Kim Delfino
California Program Director
Defenders of Wildlife
kdelfino@defenders.org



Sarah Friedman
Senior Campaign Representative
The Sierra Club
sarah.friedman@sierraclub.org

Appendix A: Data Quality Issues Underlying Project Clusters

Upon visual inspection via Data Basin, multiple terminated/expired/cancelled/withdrawn projects appeared in the renewable energy project lists; these should be removed.

- o Laurel Mountain Wind: BLM closed the case 3/17/15
- o Cleghorn Wind (SBNF, Cajon Pass): USFS rejected in 2012.
- o North Peak Wind: Withdrawn by applicant in 2014.
- o Silurian Valley Wind: Withdrawn by applicant 12/30/15.
- o Lucerne Valley Solar: BLM terminated R/W grant for non-compliance on 12/20/12.
- o Wonder Valley SCEP: Cond. Approval by SB County, no permit issued, case expired

Additionally, a spot check of solar PV projects in Fresno County found several withdrawn or cancelled projects within the data clusters.

A broader review of the project list called “Renewable Projects CEC” appears to be warranted. Projects should be cross-checked against project lists maintained by other agencies; inactive or withdrawn projects like those listed above should be removed