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LSA Comments on August 15, 2016 Joint Agency Workshop on RETI 2.0

Attached please find comments of the Large-scale Solar Association (LSA) in response to the RETI 2.0 Joint Agency Workshop, which took place on August 15, 2016.

Many thanks,
Danielle Mills

Additional submitted attachment is included below.



Submitted online

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California Energy Commission
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Sacramento, CA 95814-5512

Docket No. 15-RETI-02

Subject: Comments on the August 15, 2016 RETI 2.0 Joint Agency Workshop

The Large-scale Solar Association (LSA) appreciates the opportunity to provide written comments in response to the discussion that took place during the August 15, 2016 RETI 2.0 Joint Agency Workshop.

LSA has, in previous comments, expressed concern with the lack of clarity around how the RETI process will fit into other regulatory proceedings including that while the process is informal and non-regulatory, the data outcomes could have strong regulatory implications. While some confusion and concern remains, we do see some value in the higher-level analysis that has been conducted through this process. More specifically, it is helpful to see the transparent aggregation of data identifying possible transmission upgrades that may be needed in various areas. We will look forward to reviewing the working group reports and the Draft RETI 2.0 report, but in the meantime, offer the following comments and suggestions.

1. It is critical to use the most current and complete information available in the RETI 2.0 analysis.

The use of current and complete information can be challenging in California's constantly changing energy policy environment, however reliance on such information should be a cornerstone of statewide transmission planning efforts. To that end, we encourage the joint agencies to consider the requirements of SB 32 (Pavley), which was enrolled on August 26th, should Governor Brown sign it into law, as expected. Pending the Governor's signature, SB 32

will require the California Air Resources Board to ensure that statewide greenhouse gas emissions are reduced to 40% below the 1990 level by 2030. The increase in the state's greenhouse gas emission reduction goals could engender a greater reliance on renewable energy over the next several years, changing the landscape for long-term transmission needs. LSA does recognize, however, that only a very limited level of consideration of SB 32 is likely or possible within the RETI 2.0 timeframe.

In terms of Environmental and Land Use data, this includes using objective analysis based on the most up to date and final land use designations. LSA has strong concerns about the use of incomplete or unverified data in this process. This concern stems from the treatment of information from other informal and non-regulatory processes that have in the past developed a life of their own after completion and have been used out of context and to suggest final agreements where there were none. Specifically, the San Joaquin Valley convening was an informal process and its results, though not entirely consensus-based, are being used as inputs into this process. LSA would like to avoid situations where policy decisions are based on a foundation of incomplete or unverified information.

For the transmission analysis, LSA requests the reports incorporate the most recent Cluster 9 interconnection queue data from the California Independent System Operator. This information will further tease out the study ranges of each Transmission Assessment Focus Area (TAFAs).

LSA further appreciates the inclusion of regional information through the RETI 2.0 Outreach Project and agrees with the approach of gathering stakeholder feedback on the future of renewable markets in the west, existing capacity, constraints and trends, and future expansion options. This process is both useful in terms of gathering information and input and allowing the information to flow from and into existing state and regional transmission planning efforts. We appreciate the high-level look at California and Western TAFAs and look forward to better understanding how estimates of in-state need might change in the context of increased regionalization. We further suggest that any selection of areas for new transmission or development take place in existing state and regional planning efforts.

2. Environmental data should simply be reported out in an objective and scientific manner.

While LSA remains uncertain about what level of environmental data is ultimately necessary or helpful for this process, we would strongly oppose any suggestion to compile or aggregate environmental data into any type of scoring or screening criteria. Further, subjective determinations on siting of individual projects or transmission lines would be inappropriate in this effort.

3. LSA recommends additional clarity on certain inputs and assumptions.

LSA recommends that additional context and information be provided along with the CAISO's estimates of Fully Deliverable (FD) and Energy Only (EO) Capabilities for the TAFAs to provide a more complete picture of how these estimates should be understood in the context of on-going development. Specifically the inclusion of information for each TAFE of how many MW of projects are currently in the interconnection queue in the TAFE with signed interconnection agreements by status (EO or FCDS) along with the overall MWs of projects in the interconnection queue by TAFE.

LSA would also like to highlight that further information, expected in from the CAISO's 206-17 50% RPS Special Study is expected provide additional detailed information about the potential for congestion in these areas, hopefully at a more localized level. This kind of information and further future local area congestion studies will be important to aid the understanding of where energy only procurement makes the most sense.

Respectfully submitted,



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