

DOCKETED

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RETI Joint Agency Workshop (Aug 15, 2016) – Docket 15-RETI-02

Please see pdf attached.

Additional submitted attachment is included below.

RETI Joint Agency Workshop (Aug 15, 2016) – Docket 15-RETI-02

LS Power Comments

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LS Power applauds the work done by all agencies on RETI 2.0. The work being done under the RETI framework will be critical in guiding California to meet its renewable energy and Greenhouse Gas goals. We are encouraged that RETI 2.0 is not only exploring combinations of renewable resources within California, but is also looking at renewable options out of state and transmission implications of these options. This is consistent with the efforts ongoing under various other proceedings. While good progress has been made thus far on this initiative, and we commend the RETI team for that, we believe the following items should be further analyzed and their findings included in the report that RETI will release later this year.

- (1) *What incremental transmission capacity is needed to deliver out of state renewables into California and what is the cost for this capacity and the feasibility of building new transmission?*

RETI Transmission Technical Input Group (TTIG's) analysis concludes that there is sufficient transmission capacity available at most of the California import locations in the Southern portion of CAISO system (such as Eldorado, Mead, Marketplace, Delaney), but it does not answer the question of how much additional transmission capacity is needed to bring out of state renewables to the California import delivery points. Also, it does not address the capital cost of this new transmission capacity and the feasibility of permitting and building a new transmission project for providing this transmission capacity. In order for the policy makers to analyze the transmission impacts of bringing out of state renewables into California (such as Wyoming wind), these are all important questions to be answered. We understand that RETI is conducting a west wide outreach through Western Interstate Energy Board workshops. We encourage the RETI team to continue with this outreach and conclude its findings addressing the questions we suggest above so the information can be used by policy makers and the Planning Regions to use in their planning analyses.

- (2) *Interaction between Transmission Assessment Focus Areas (TAFAs):*

RETI TTIG's analysis has looked at the impacts of injecting pre-determined amount of Full Capacity deliverability resources at various TAFAs. This analysis has primarily been focused on handling one TAFE at a time and drawing conclusions on need for additional transmission for these pre-determined generation injections. We recommend that this analysis should also consider the impacts of building new transmission for one TAFE on improving import capability for another TAFE. For instance, if a bulk 500 kV transmission line was built to provide transmission capacity for out of state resources to be delivered to a particular TAFE, will this also improve import capability at any other TAFE locations? As an example, if SWIP North (a new transmission line between Midpoint & Robinson Summit 500 kV substations) is built, LS Power's analysis shows that this reduces approximately 300 to 400 MW of flows on the existing California Oregon Intertie (COI) path. RETI TTIG's analysis for Northern California TAFE concluded that a new 500 kV line between CA/OR border and Tesla/Tracy stations in California, at a capital cost of \$2bn to \$3bn will be needed to make ~2500 MW of new renewables deliverable from Pacific Northwest. If a project such as SWIP North were to relieve congestion at the California Oregon Intertie does this allow more renewable resources to be delivered to California from Pacific Northwest? These ancillary benefits should be considered for decision making.

- (3) *Analysis of various transmission options and timing of decision making for transmission planning:*

As the RETI team analyzes the various transmission options for the new renewable and GHG goals, it should consider if there are any options that provide benefit to California under all three scenarios: (a) Status Quo – CAISO continues to operate and expand its EIM market while keeping the same footprint (b) CAISO and PacifiCorp integrate, and CAISO footprint expands (c) Complete west-wide integration takes place and CAISO's footprint expands to the entire west. If a transmission option provides benefits under all these scenarios, then its analysis should be advanced in the Transmission Planning processes for the Planning Regions.