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Dear RETI 2.0 Leadership Team:

Our organizations strongly support the objective of the RETI 2.0 initiative to explore new transmission to meet the needs of an increasingly carbon free California economy. We commend you on the significant progress that RETI 2.0 has made in aggregating important information from existing studies and multiple regulatory planning processes. For the first time, data from across studies and proceedings has been brought together in one forum for exploration. This exercise has provided valuable insights and has also raised important questions that should be resolved in the forthcoming RETI 2.0 report.

Accordingly, our organizations provide the following recommendations for that report.

1. **Need projections should align with California climate policy.**

The need projections identified in RETI 2.0 must be consistent with California climate policy, including SB350. Although 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 RETI 2.0 (40,000 MW) is likely many times larger than what is needed, and indeed, is many times larger than the most recent outputs from the Public Utilities Commission (CPUC)'s Renewables Portfolio Standard (RPS) Calculator. Rather than using the most recent state data, RETI 2.0 uses a range of projections from older third-party reports. Notably, these numbers assume the energy efficiency goals in SB 350 do not occur. We recommend RETI 2.0 use the most recent information on renewables need developed by the CPUC.

2. **Geographic areas identified should align with ongoing planning efforts for renewable energy and conservation.**

The RETI 2.0 planning process has defined new Transmission Assessment Focal Areas (TAFAs) and during the July 21st Environmental and Land Use Technical Group (ELUTG) meeting introduced Project Concentration Areas (PCAs)[1] as spatial areas for potential siting of renewable generating facilities to guide the study of transmission and environmental implications by the Transmission Technical Input Group (TTIG) and the ELUTG.

There are inconsistencies between these areas and geographic areas identified in final local, state, or federal planning processes as areas available or not available for renewable energy development. This misalignment is concerning. For example, the TAFA in Los Angeles County encompasses Significant Ecological Areas which are not available for renewable energy generation[2] and PCAs in the San Joaquin Valley are not consistent with the areas identified as "least conflict" in the "Solar and the San Joaquin Valley Identification

[1] July 2016. https://reti.databasin.org/maps/e3616f36144849a9bdc724dc655bc0f9/active. Although the PCAs do not appear to be included in either the TTIG[1] or ELUTG[1] reports, we are concerned about their potential role in RETI.
[2] Ibid, pages 34-35

of Least-Conflict Lands Project" report[3]. In the California desert, a substantial amount of the Desert Renewable Energy Conservation Plan (DRECP) Phase I Development Focus Areas (DFAs) are inexplicably not included in these areas. This is very concerning particularly given the statements by the state and federal agencies that transmission will be aligned to ensure that the DFAs will be usable for future development.

Equally troubling, these areas either envelop or are contiguous to areas that are not available for development.[4] If RETI 2.0 is to inform transmission decision-making, these areas should be consistent with federal and state renewable energy and land use plans. It is essential to align transmission planning with these local, state and federal siting efforts to meet California's ambitious renewable energy goals in a timely and environmentally responsible manner.

We recommend that areas inconsistent with the land use decisions of planning processes or initiatives either be eliminated from the RETI 2.0 report or those inconsistencies be identified and reflected to ensure that there is an accurate accounting of what may or may not be available for development within these areas.

3. RETI 2.0 did not achieve the objective of analyzing land use and environmental implications.

The original objective of the RETI 2.0 ELUTG was to identify land use and environmental opportunities, constraints, and implications to accessing (high-value renewable) resources that need transmission[5]. This analysis was never conducted. Therefore, it is imperative that the forthcoming RETI 2.0 report does not imply that land use and/or environmental analysis was completed.

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[3] May 2016. *A Path Forward: Identifying Least-Conflict Solar PV Development in California's San Joaquin Valley*. Conservation Biology Institute and Center for Law, Energy & the Environment (CLEE), University of California, UC Berkeley School of Law, CA

[4] For example, some PCAs are located on top of existing incorporated cities (e.g., City of Woodland) and some PCAs overlap with conservation areas on public land in which renewable energy development is prohibited (e.g., conservation designations within the DRECP Phase I Land Use Plan Amendment).

[5] Turner, B. (2016) *Plenary Group Meeting on Long-Term Renewable Scenarios and Transmission Assessment Focus Areas, s*lides 3-4. [PowerPoint Presentation].

As follows are four recommendations on themes and findings that the RETI 2.0 report should explore.

First, we appreciate the discussion in the ELUTG report[6] of the development and possible uses of analytical products and tools to improve integration of land use and environmental considerations into electricity planning (e.g. Data Basin and the environmental report writer). We recommend that the forthcoming RETI 2.0 report describe these tools and their uses and the report narrative must clearly state that these tools were not applied in the RETI 2.0 process and therefore did not shape results or outcomes.

Second, we recommend that any TAFA specific narrative in the RETI 2.0 report rely upon the results of local, state, and federal planning processes, as the RETI 2.0 process did not conduct new land use or environmental analysis. Specifically, the San Joaquin TAFA narrative should describe the Least Conflict Lands for solar energy identified in the Solar in the San Joaquin Valley process[7]. The California Desert TAFAs narrative should describe the Development Focus Areas designated by the Bureau of Land Management's DRECP Phase I Land Use Plan Amendment (LUPA)[8], and the renewable energy zones and overlays established in local government planning processes. We recommend that the RETI 2.0 report identify the backbone (bulk system) upgrade implications of interconnecting renewable generation facilities within Development Focus Areas[9], local government

[6] Flint, Scott, Eli Harland, Misa Milliron, Gabriel Roark. 2016. *Environmental and Land Use Information to Support the Renewable Energy Transmission Initiative 2.0 Process.* California Energy Commission. Publication Number: CEC-700-2016-007

[7] May 2016. *A Path Forward: Identifying Least-Conflict Solar PV Development in California's San Joaquin Valley*. Conservation Biology Institute and Center for Law, Energy & the Environment (CLEE), University of California, UC Berkeley School of Law, CA

[8] 2016. Desert Renewable Energy Conservation Plan. *Record of Decision for the Land Use Plan Amendment to the California Desert Conservation Plan, Bishop Resource Management Plan, and Bakersfield Resource Management Plan*. U.S. Bureau of Land Management.

[9] 2016. Desert Renewable Energy Conservation Plan. *Record of Decision for the Land Use Plan Amendment to the California Desert Conservation Plan, Bishop Resource Management Plan, and Bakersfield Resource Management Plan*. U.S. Bureau of Land Management.

identified renewable energy development areas[10], and Least-Conflict Lands[11] within the California Deserts TAFAs and San Joaquin Valley TAFA, respectively. (We recognize that upgrades to local level systems will largely depend on the specific locations of future projects.)

Third, we recommend that the next cycle of the California Independent System Operator's (CAISO) Transmission Planning Process (TPP) incorporate the results of final local, state, or federal planning processes into their study, including Development Focus Areas[12], local government identified renewable energy development areas[13], and Least-Conflict Lands[14]. This can be documented as a recommendation or next step in the RETI 2.0 report. We appreciate that the CPUC has moved to incorporate this data into their portfolio generation via the RPS Calculator as these portfolios are an important input into the TPP.

Fourth, the ELUWG report has underscored the importance of including spatial land use data in generation and transmission modeling and planning; we recommend that the RETI 2.0 report explicitly document this finding. We recommend that Data Basin continue to be used as a central platform for aggregating spatial data associated with RETI 2.0.

[10] Inyo County: http://www.inyoplanning.org/projects/documents/Exhibit1CEQAFindings.pdf (See Table 1). LA County: http://file.lacounty.gov/bos/supdocs/95462.pdf. Imperial County: ftp://ftp.co.imperial.ca.us/icpds/eir/cec/final/22Revisions.pdf

[11] May 2016. *A Path Forward: Identifying Least-Conflict Solar PV Development in California's San Joaquin Valley*. Conservation Biology Institute and Center for Law, Energy & the Environment (CLEE), University of California, UC Berkeley School of Law, CA

[12] 2016. Desert Renewable Energy Conservation Plan. *Record of Decision for the Land Use Plan Amendment to the California Desert Conservation Plan, Bishop Resource Management Plan, and Bakersfield Resource Management Plan*. U.S. Bureau of Land Management.

[13] Inyo County: http://www.inyoplanning.org/projects/documents/Exhibit1CEQAFindings.pdf (See Table 1). LA County: http://file.lacounty.gov/bos/supdocs/95462.pdf. Imperial County: ftp://ftp.co.imperial.ca.us/icpds/eir/cec/final/22Revisions.pdf

[14] May 2016. *A Path Forward: Identifying Least-Conflict Solar PV Development in California's San Joaquin Valley*. Conservation Biology Institute and Center for Law, Energy & the Environment (CLEE), University of California, UC Berkeley School of Law, CA

Conclusion

We appreciate the opportunity to participate in the RETI 2.0 planning process and to provide comments on the forthcoming RETI 2.0 report.

Respectfully submitted,

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