

## DOCKETED

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<b>Project Title:</b>	Renewable Energy Transmission Initiative 2.0
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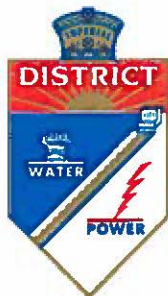
*Comment Received From: Jamie Asbury*

*Submitted On: 1/9/2017*

*Docket Number: 15-RETI-02*

**15-RETI-2.0 - Imperial Irrigation District Comments**

*Additional submitted attachment is included below.*



# IID

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January 9, 2017

Robert B. Weisenmiller, Ph.D., Chair  
California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814-5512

Dear Chair Weisenmiller:

**Subject: 15-RETI-02 (Renewable Energy Transmission Initiative)**

Imperial Irrigation District appreciates the opportunity to provide comments with regard to the draft Plenary Report presented during the January 3, 2017 webinar and meeting. IID recognizes the tremendous effort that resulted in the draft report; CEC leadership and all participants are to be commended with regard to their dedication and efforts.

IID submits the following comments:

1. IID appreciates that the report recognized the geothermal industry has invested in research and technologies that improve generation flexibility. IID has long recognized the benefits of clean, renewable, variable generation if needed, and baseload geothermal and is pleased the technology is viewed as one that provides overall benefit. Geothermal generation's role in reducing greenhouse gas emissions and providing ancillary services are benefits that should also be considered in the benefits the technology brings.
2. Recognition that siting of development in the Salton Sea area provides co-benefits is prudent given the potential environmental hazard.
3. IID agrees that from a planning perspective it is important to consider transmission needs from a regional perspective. However, if the goal is to support California's Renewable Portfolio Standard Requirement of 50% by 2030, the focus should be specifically on meeting the State of California's needs at the lowest possible cost.
4. IID appreciates that the report addresses various Transmission Access Focus Areas (TAFAs) and less focus on Competitive Renewable Energy Zone (CREZ) designations. IID continues to be concerned that when resources sited within the IID service territory are combined with those of CAISO-controlled areas (both located within the Imperial Valley TAFAs), the true benefits of an IID-interconnected resource are not readily recognized. There are a number of benefits interconnections to the IID system bring, such as lower transmission costs, diverse resource potential and larger resource footprint than that of CAISO and economic development to a California region badly in need of the benefits that development would bring. The benefits of IID-interconnected generation do not stand out when the resource potential is combined with resources located adjacent to San Diego

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Gas & Electric and Southern California Edison not within the Imperial Valley TAFE. We suggest the Imperial Valley TAFE be the IID Balancing Authority area to ensure the advancement of California's goals and objectives in the areas of environmental protection, social justice and ratepayer protection.

5. Finally, IID is concerned regarding the apparent inter-state nature of the RETI 2.0 process given the number of jurisdictional and permitting approvals required. It does not appear likely there is sufficient time to permit such facilities in a timeframe necessary to meet California's 50% requirements. IID renews its call for a closer look at leveraging existing, available transmission and shovel-ready resources located in-state. Development of resources on already designated state and federal lands, together with existing and available transmission capacity in IID and elsewhere in California should be a priority. These in-state resources are likely to result in overall cost savings to California ratepayers when the economic benefits they bring are considered.

IID looks forward to continuing its active participation in the RETI 2.0 process, and appreciates the opportunity to provide these comments.

Sincerely,



Vicken Kasarjian  
Energy Manager  
IMPERIAL IRRIGATION DISTRICT

cc: Ralph Cordova, Imperial County  
Andy Horne, Imperial County