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ITC Grid Development's Comments on Draft RETI 2.0 Plenary Report

ITC Grid Development appreciates the efforts of the California Natural Resources Agency and all other Agencies and Organizations involved in preparing the Draft RETI 2.0 Plenary Report. The Draft Report contains valuable information on renewable generation resources in California and throughout the West, land use and environmental constraints, and potential transmission opportunities. California's goals of a 50 percent Renewables Portfolio Standard and 40 percent statewide greenhouse gas emission reduction from 1990 levels by 2030 require a flexible, resilient transmission system that can reliably incorporate renewable generation sources into the grid. Maintaining reliable transmission system operation is of vital interest to all customers and stakeholders as rapidly changing operating conditions resulting from high renewable resource penetration, modifications to coal- and gas-fired generation requirements and materially revised resource mix occur throughout the west.

Given the lead time needed to design, build, and construct transmission facilities, it is important for policymakers to act upon the insights provided by the RETI effort and fold them into the transmission planning process in a timely way. The Draft Report notes that the RETI 2.0 project is intended to inform regulatory processes as well as public and private planning and resource decisions. It would be helpful for the Final Report to conclude with a section outlining "next steps": ways in which the Final Report can be used in these processes and decisions. While sections of the Draft Report identify potential uses for the information provided therein, concluding the Final Report with "next steps" will support continued momentum toward meeting California's ambitious climate goals.

We encourage the California organizations that were involved in the RETI 2.0 effort to consider a joint investigation with the neighboring transmission system owners as part of the "next steps." Of particular interest is identification of systemic needs related to anticipated operational challenges with rapidly expanding renewable generation simultaneous with closure of conventional resources. This work could form the basis to demonstrate performance impacts of various alternative new projects as resources for helping to maintain frequency and voltage stability under contingency conditions during ramping events as illustrated by the CAISO "duck curve." Policymakers should consider incentivizing grid assets that enhance the electric transmission system's stability and efficiency, which are both going to be challenged by the increasing amount of renewables mentioned above. This would include assets both in and outside of California.