

DOCKETED

Docket Number:	15-RETI-02
Project Title:	Renewable Energy Transmission Initiative 2.0
TN #:	215220
Document Title:	California Municipal Utilities Association Comments: on the Meeting regarding the Renewable Energy Transmission Initiative 2.0 Plenary Report
Description:	N/A
Filer:	System
Organization:	California Municipal Utilities Association
Submitter Role:	Public
Submission Date:	1/10/2017 4:18:00 PM
Docketed Date:	1/10/2017

Comment Received From: California Municipal Utilities Association

Submitted On: 1/10/2017

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on the Meeting regarding the Renewable Energy Transmission Initiative 2.0 Plenary Report

Additional submitted attachment is included below.

BEFORE THE CALIFORNIA ENERGY COMMISSION

In the Matter of:

Docket No. 15-RETI-02

Renewable Energy Transmission Initiative 2.0

RE: Renewable Energy Transmission Initiative 2.0 Plenary Report Meeting

COMMENTS OF THE CALIFORNIA MUNICIPAL UTILITIES ASSOCIATION ON STAFF MEETING REGARDING THE RENEWABLE ENERGY TRANSMISSION INITIATIVE 2.0 PLENARY REPORT

The California Municipal Utilities Association (“CMUA”) appreciates the opportunity to provide these comments to the California Energy Commission (“Commission”) on the *Meeting regarding the Renewable Energy Transmission Initiative 2.0 Plenary Report* (“Meeting”), held on January 3, 2017. At the Meeting, staff gave an overview of the draft Renewable Energy Transmission Initiative (“RETI”) 2.0 Plenary Report (“Report”). This Report, in essence, is intended to be a synthesis of the prior work done by the groups involved in the RETI 2.0 process. CMUA acknowledges the efforts of these groups, as well as Commission staff, in developing the Report for public review at the Meeting. However, CMUA wishes to raise certain issues regarding utilization of the Report moving forward and respectfully provides the below comments.

I. The Commission Should Be Mindful That the Recommendations and Conclusions of the Plenary Report Are Non-Regulatory

CMUA would like to underscore an important point that is raised several times throughout the Report. The Executive Summary notes that RETI 2.0 is “[a] high-level, *non-regulatory* review of the utility-scale renewable energy potential in California and the West” and “[a] series of ‘what if’ questions.”¹ CMUA is concerned that, despite the fact that the Report on its face recognizes that it is not the result of a regulatory process, the Report has the potential to be afforded undue

¹ RETI 2.0 Executive Summary pg. 1 (emphasis added).

weight in other proceedings, such as in the California Public Utilities Commission Integrated Resources Plan (IRP) proceeding, which was mentioned at the Meeting.

CMUA believes that the non-regulatory RETI 2.0 recommendations and conclusions can be useful to inform scenarios in formal regulatory planning proceedings, such as IRP, by providing updated data. However, RETI information has not been properly vetted for use in a formal regulatory setting. Without dwelling on specific examples at risk of missing the broader point, it does not seem clear that certain of the transmission projects identified would accomplish delivery of identified resources in and of themselves, because they may trigger an even greater need to reinforce transmission downstream from the identified major project. Thus, CMUA would not support using transmission upgrades identified in the Report as a direct input into any regulatory proceeding, or the California Independent System Operator's Transmission Planning Process, since RETI is meant to be a targeted look at the proposed Transmission Assessment Focus Areas, rather than a portfolio development tool for transmission planning.

II. The Commission Should Ensure That RETI 2.0 is Not Utilized to Seek Endorsement of Any Specific Development Proposal, Plan or Project

The Plenary Report Executive Summary also notes that RETI 2.0 is NOT “[a]n endorsement of any specific development proposal, plan, or project.”² In light of certain comments made at the Meeting, CMUA requests that the Commission emphasize that information derived from RETI is not properly utilized by any party to advance any particular project or agenda. CMUA again notes that it is important to remember that the Report conclusions and recommendations are simply the answers to “what if” questions, and represent only one set of potential alternatives for future solutions. Moreover, since the conclusions and recommendations in

² *Id.*

the Report are not the outcome of a regulatory process, these ought to be characterized as mitigation options.

III. CONCLUSION

CMUA appreciates the opportunity to provide these initial comments to the Commission, and looks forward to continue working with staff on RETI 2.0.

Respectfully,

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