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LSA Comments on RETI 2.0 Plenary Report - Public Review Draft

Please accept the attached comments of the Large-scale Solar Association on the RETI 2.0 Plenary Report - Public Review Draft.

Many thanks,
Danielle

Additional submitted attachment is included below.



January 10, 2017

California Energy Commission
Dockets Office, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

Submitted online to Docket No. 15-RETI-02

Subject: Comments on the RETI 2.0 Plenary Report - Public Review Draft

The Large-scale Solar Association (LSA) appreciates the opportunity to provide written comments in response to the RETI 2.0 Plenary Report – Public Review Draft. We believe that the characterizations of the findings and recommendations of the report are appropriate for this informal, non-regulatory process, and we encourage further exploration of some of the findings of the report in future formal processes, such as the 2018 Transmission Planning Process at the California Independent System Operator (ISO) as well as the Integrated Resource Plan development at the CEC (for publicly-owned utilities) and the California Public Utilities Commission (CPUC). LSA offers the following comments on the RETI 2.0 Plenary Report – Public Review Draft.

- 1. The level of environmental analysis is appropriate for this initial effort to ask questions about specific regions of possible development. More specific environmental data is relevant to renewable energy and transmission siting efforts.**

LSA previously expressed concern about including granular environmental data and encouraged the RETI teams to avoid any type of environmental data aggregation that could result in screening or scoring. LSA appreciates the high-level analysis that the RETI 2.0 Plenary Report includes in the Transmission Access Focus Areas (TAFAs). More granular environmental considerations are appropriate to address in the context of specific renewable energy and transmission project siting efforts.

- 2. The agencies should clearly communicate the findings of the RETI 2.0 Plenary**

Report to the ISO and the CPUC, in particular, for incorporation and integration into other energy planning processes.

The RETI 2.0 Plenary Report – Public Review Draft notes that “The ISO 2016-2017 Transmission Plan under development will take into account the latest system conditions and provide information regarding additional deliverability expected to be available for IID and ISO connected Imperial area generation.”¹ However, the ISO’s 2016-2017 Transmission Planning Process (TPP) is already underway, beginning with a kick-off meeting in November of 2016. The RETI 2.0 staff should convey the informal findings of the Final RETI 2.0 Plenary Report to CAISO TPP staff. LSA previously suggested that the RETI 2.0 report should incorporate the most recent Cluster 9 interconnection queue data from the ISO. This information will be a critical input to the 2016-2017 TPP. The current level of analysis in the RETI 2.0 effort is sufficient – though not complete or specific - for this baseline investigation.

Furthermore, work to develop a set of IRP inputs, assumptions, and portfolios is underway at the CPUC. CPUC staff and interested stakeholder should also be briefed on the findings and next steps for RETI 2.0 information, for improved efficiency, interagency coordination, and appropriate use of preliminary, non-regulatory findings.

Conclusion

LSA appreciates the level of analysis conducted as part of the RETI 2.0 effort, as well as the characterization of RETI 2.0 findings as preliminary and non-binding. LSA believes that the questions asked by the RETI 2.0 team are worthy of future discussion and consideration in future energy and transmission planning efforts.

Respectfully submitted,



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¹ [RETI 2.0 Plenary Report – Public Review Draft](#). P. 5.