

DOCKETED

Docket Number:	15-RETI-02
Project Title:	Renewable Energy Transmission Initiative 2.0
TN #:	215231
Document Title:	County of Imperial Comments: On Draft RETI 2.0 Plenary Report
Description:	N/A
Filer:	System
Organization:	County of Imperial
Submitter Role:	Public Agency
Submission Date:	1/11/2017 8:44:01 AM
Docketed Date:	1/11/2017

Comment Received From: County of Imperial

Submitted On: 1/11/2017

Docket Number: 15-RETI-02

On Draft RETI 2.0 Plenary Report

Additional submitted attachment is included below.

DISTRICT 1
JOHN R. RENISON

DISTRICT 2
LUIS A. PLANCARTE

DISTRICT 3
MICHAEL W. KELLEY

DISTRICT 4
RYAN E. KELLEY

DISTRICT 5
RAY CASTILLO



Board of Supervisors
County of Imperial

COUNTY ADMINISTRATION CENTER

940 MAIN STREET, SUITE 209
EL CENTRO, CA 92243-2871
TELEPHONE: (442) 265-1030
FAX: (442) 265-1027

January 10, 2017

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

Attn: Robert Weisenmiller, Chairman
Re: Docket # 15-RETI-02

Dear Chairman Weisenmiller:

The County of Imperial welcomes the opportunity to submit comments on the draft RETI 2.0 Plenary Report which was released on December 16, 2016. The County has been continuously involved in the RETI 2.0 process and has enjoyed working with CEC and the other relevant State agencies in our efforts to meet California's renewable energy and greenhouse gas reduction goals. We greatly appreciate the recognition given in the Report to the work Imperial County has done, with CEC's valuable assistance, in preparing ourselves to help California in this effort. Furthermore, we agree wholeheartedly with the Report's acknowledgment of the magnitude and value of those yet-untapped energy resources located here, particularly in the Salton Sea area. However, we would be remiss if we did not point out some areas where we believe the draft Report could be improved, and in furtherance of that, we submit the following comments:

We note with some concern the Report's seeming dependence on out-of-state resources to meet California RPS objectives. Given the abundant in-state energy potential, which the Report accurately identifies, it appears counter-intuitive to spend California ratepayer monies, being used in furtherance of a California public policy purpose, to provide benefits to the economies of other states. This seems particularly unwise to us, given the fact that residents of disadvantaged communities in Imperial County have, and would likely continue to benefit from development of local energy facilities.

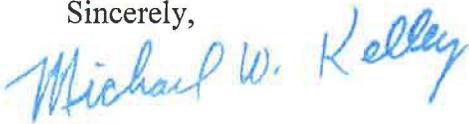
As a corollary to the above concern, the Report's draft suggestion of building new transmission projects to access remote generation is problematic. We suggest that emphasis be placed on increasing transmission capacity within California. In the case of the Imperial Valley TAFAs, these would be the IID North Gila-Midway-Devers, IID Hooper-SONGS HVDC and Desert Southwest Transmission Lines.

January 10, 2017
Page Two

Finally, though the Report accurately points out the benefits to the California grid of bringing more geothermal energy online, it mentions the existing CPUC RPS Calculator Valuation Framework. In our opinion, that Framework needs to be remodeled if we are going to be successful in getting those geothermal resources built. The Low Carbon Grid Study, which the Report references, spells out the many advantages new geothermal generation would create. We believe there is one important attribute that is particularly relevant to the RETI 2.0 effort. As a high capacity factor resource (over 90%), with ancillary services capability, geothermal generation would greatly maximize the utilization of existing and new transmission assets, especially as compared to the current over-reliance on intermittent supplies from wind and solar.

Once again, we thank the many agencies and stakeholders involved for putting together this valuable Report and for allowing us to provide comments on the draft. We look forward to continuing our combined efforts to realize the many benefits of continued development of renewable energy resources in Imperial County and we hope that our comments will be helpful in accomplishing this objective.

Sincerely,



Michael W. Kelley

Chairman, Imperial County Board of Supervisors

cc: Bruce Kuhn, President, IID Board of Directors

Kevin Kelley, IID General Manager

Vicken Kasarjian, IID Energy Manager