

## DOCKETED

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**Comments from TANC on the RETI 2.0 Plenary Group Report-Public Review Draft**

*Additional submitted attachment is included below.*



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**Comments on the RETI 2.0 Plenary Group Report-Public Review Draft (Dated December 16, 2016)**

**January 10, 2017**

The Transmission Agency of Northern California (TANC) appreciates the opportunity to provide comments on the December 16, 2016-Public Review Draft Renewable Energy Transmission Initiative (RETI) 2.0 Plenary Report. TANC was formed in 1984 as a joint powers authority to plan and develop transmission facilities in a coordinated manner for our 15 publicly-owned utility (POU) Members. It is TANC's mission to assist its POU Members in providing cost-effective energy supplies to their customers, through long-term ownership or contracts for service over high-voltage transmission lines within California and the western United States. TANC is the project manager of the California-Oregon Transmission Project (COTP) a 340-mile 500-Kilovolt (kV) alternating current (AC) transmission line between Southern Oregon and Central California. The COTP is a prime example of coordinated joint inter-regional transmission planning. The COTP Participants, California utilities, and parties in the Pacific Northwest spent considerable time and effort in the planning, study, and ultimate development of the COTP and the third Northwest Intertie in the Pacific Northwest. The COTP and the other 500-kV facilities in California (the Pacific AC Intertie) comprise the California-Oregon Intertie (COI) which is critical for promoting interstate commerce, the bi-directional transfer of clean and economic energy, and will be critical for meeting California's future energy goals.

TANC previously submitted comments on the RETI 2.0 process in November 2015, regarding the importance of ensuring that in consideration of a statewide or regional planning effort to meet renewable energy goals that the use of existing transmission lines and corridors continue to be optimized. Also, that in the process of exploring combinations of renewable generation resources in California and throughout the West that can best meet renewable energy goals, the location and utilization of existing transmission lines and corridors is given priority.

TANC was also an active participant in the Transmission Technical Input Group (TTIG). Through the TTIG, TANC has continued to comment that the interconnection of new firm deliverability resources in northern California would require upgrades to transmission to avoid having to curtail hydroelectric resources in northern California and/or renewable or hydroelectric resources in the Pacific Northwest. TANC supports the conclusion in the draft Plenary Report that there is no existing capacity available for full-deliverable resources from

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either generation in northern California or imports from the Northwest due in large part to congestion on the COI. TANC is also supportive of the report's conclusions that while it is possible that energy only resources could be interconnected to the grid in northern California, that such resources would likely have to be curtailed to mitigate post-contingency overloads and therefore, the aggregate capacity of such would have to be limited to be compatible with current California Independent System Operator (CAISO) planning standards.

TANC remains fully supportive of California meeting its policy mandates as they relate to renewable resources and greenhouse gas reduction. TANC also remains supportive of considering potential long-range solutions that are compliant with these policies as well as California's Garamendi Principles. We are supportive of the conceptual mitigation examples that were provided in the draft Plenary Report which include a fourth transmission line between the California-Oregon border and the Tracy/Tesla area but also noted that other feasible mitigation examples should be fully considered.

The evolving California electricity marketplace is seeing an increase in congestion on transmission paths between the Pacific Northwest and California and between southern California and northern California. TANC believes that the Plenary Group reached the right conclusion in acknowledging the congestion on the COI as the limiting factor to interconnecting more resources. In developing a strategy to promote renewable and/or transmission development that addresses these conditions it is crucial that resource diversification be considered. Locating the majority of the renewable resources in the southern portion of the state will not be a sustainable solution to helping California reach its policy mandates.

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