

DOCKETED

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Additional submitted attachment is included below.



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June 15, 2017

Via e-Comment Portal

California Energy Commission
Docket Unit
Docket No. 17-IEPR-07
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512

**Re: *In the Matter of: 2017 Integrated Energy Policy Report (2017 IEPR),
Docket No. 17-IEPR-07
Imperial Irrigation District Comments in Response to May 25, 2017 IEPR
Commissioner Workshop on Draft Guidelines for Publicly Owned Utility
Integrated Resource Plans***

The Imperial Irrigation District ("IID") offers comments pursuant to the California Energy Commission's ("Energy Commission") May 11, 2017 "Notice of IEPR Commissioner Workshop on Draft Guidelines for Publicly Owned Utility Integrated Resource Plans." The Energy Commission's May 11 Notice scheduled a Workshop held on May 25, 2017 to discuss issues related to the development of draft Guidelines to govern publicly owned utility ("POU") submissions of Integrated Resource Plans ("IRPs") to the Energy Commission.

IID is an irrigation district, located in Southern California, organized and operated pursuant to the California Water Code, which undertakes both electric and water operations. IID is subject to Senate Bill 350's (de Leon, 2015) requirement to submit IRPs to the Energy Commission.

In submitting these Comments today, IID expresses its support for the Comments submitted on this day in the above-referenced docket by the joint POU group consisting of Southern California Public Power Authority ("SCPPA"), of which IID is a member, California Municipal Utilities Association ("CMUA"), of which IID is also a member, and the Northern California Power Agency ("NCPA"). By submitting additional Comments, IID provides an individual utility-specific perspective on the issues raised at the May 25 Workshop.

IID is committed to the State's renewable portfolio standard ("RPS") and greenhouse gas ("GHG") reduction goals, and appreciates the flexibility that Energy Commission Staff has shown through this process. In the context of the Guidelines as developed, IID wishes to

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share some of the ways it currently foresees plans to meet those goals in its IRP. First, IID acknowledges the important role of solar photovoltaic power, wind resources and battery storage to meet RPS and GHG goals. Those are important resources, and they each have their own advantages and challenges. However, IID believes it is important to account for not only those resources, but geothermal generation, both baseload and fully dispatchable geothermal generation. Fully dispatchable geothermal generation can facilitate the penetration of intermittent resources through its flexibility, and in assisting in maintaining system inertia, a topic that was discussed in the May 12, 2017 Energy Commission workshop on the need for flexibility on the grid.

Implementation of new geothermal generation in the Salton Sea area would have a particularly beneficial effect providing jobs to an area that has been impacted by heightened health concerns, particularly the high incidence of asthma in children in the area, due to receding waters in the Salton Sea and resultant exposure to dust and other pollutants. IID sees an important part that fully dispatchable geothermal generation can play in meeting the planning goals set forth in its IRP.

Further illustrating its commitment to State energy policy goals, IID is pleased to relate that it has been named as one of a select group of utilities that connected storage to the grid in 2016, earning it a spot on the annual Top 10 utility industry lists compiled by the Smart Electric Power Alliance (“SEPA”), including a ranking of No. 1 on the Utility Energy Storage list with 30 megawatts of installed storage in 2016.¹ IID’s battery storage recently received accolades for demonstrating its capability of providing black start services to start a 44 MW combined-cycle facility.²

Second, IID foresees that discussion in its IRP involving transportation electrification will include consideration of rural (6,400 sq. mile service territory), low income communities (some of the lowest per capita income) such as the agricultural communities in Imperial County and the eastern half of Riverside County. For example, a question for IID is to what degree will electric vehicles be adopted in rural, agricultural communities, and how does this consideration impact expectations in an IRP.

Next, a significant part of IID’s customer base shares economic challenges with those of disadvantaged communities. IID anticipates that a focus of its IRP will be efforts undertaken to reduce barriers for access to renewable resources commensurate with the State’s energy goals, while balancing IID’s overall procurement policies with the need to avoid imposing undue cost burdens on its customers. IID’s efforts include its eGreen Tariff³ program, which will provide solar energy to qualifying IID customers without the need to install individual rooftop systems. Under the eGreen Tariff program, customers in the Imperial and Coachella valleys, who would otherwise not have the financial resources of solar energy, would be provided the ability to do so.

¹ <http://www.iid.com/Home/Components/News/News/553/30?backlist=%2F>

² <http://www.iid.com/Home/Components/News/News/557/30?backlist=%2F>

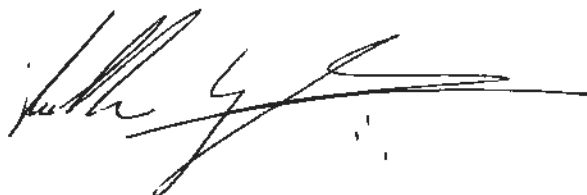
³ <http://www.iid.com/Home/Components/News/News/559/30?backlist=%2F>

Lastly, IID's IRP will necessarily reflect meeting the Federal Energy Regulatory Commission ("FERC") and other federal requirements as to real time energy balancing responsibilities and meeting the reliability requirements for operating a Balancing Authority Area.

All of the above illustrates why a one-size-fits-all approach for IRPs will not be effective in that such an approach would provide an inaccurate picture of the efforts of the POUs submitting IRPs to meet State energy goals. It is important for POUs such as IID to be able to tailor the means to achieve state energy policy goals to the needs and strengths of their customer base. IID believes that for those that wish to engage in the substantive discussion of the methods and means reflected in IRPs, that such persons/entities should be encouraged to participate at the local level.

IID thanks the Commission for the opportunity to submit written comments. IID looks forward to further dialogue on these issues.

Respectfully yours,



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