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CORD Comments on Land-Use Screens

Additional submitted attachment is included below.

October 31, 2022

Docket: 22-IEPR-02 (Land-Use Screen Workshop)

To: California Energy Commission, California Public Utilities Commission, and Air Resources Board

INTRODUCTION

The Coalition for the Optimization of Renewable Development (C.O.R.D.) is a nonpartisan coalition of renewable energy developers, energy and transmission companies dedicated to advancing renewable energy development in the West with particular focus on solar, wind and geothermal development in the Southern Nevada region of the California Independent System Operator's (CAISO) grid.

The Southern Nevada region of CAISO has excellent site attributes which are attractive to renewable developers including: excellent solar insolation; access to large unparcelized areas with favorable topography; access to rich geothermal resources; reasonable proximity to qualified labor; a stable and predictable permitting environment; fewer endangered or threatened species in comparison with California by a factor of approximately 4 (28:121 as of July 2016); as well as low population density. As a result, the region is an area of high commercial interest for renewable development that is well-suited to provide timely, low-cost, reliable, renewable energy to California in order to help meet its green house gas (GHG) reduction and renewable portfolio standard (RPS) goals. This is demonstrated by the fact that there are currently over 6,600MW of renewable generation (solar, geothermal and wind) and approximately 2,200MW of

4-hour battery storage currently in the CAISO queue[1]. Additionally, there are a significant amount of resources in various stages of development that are anticipated to file interconnection requests to the Southern Nevada region of CAISO in upcoming Queue Cluster Application Windows. See Figure 1 for details on those requests totaling nearly 30GW.

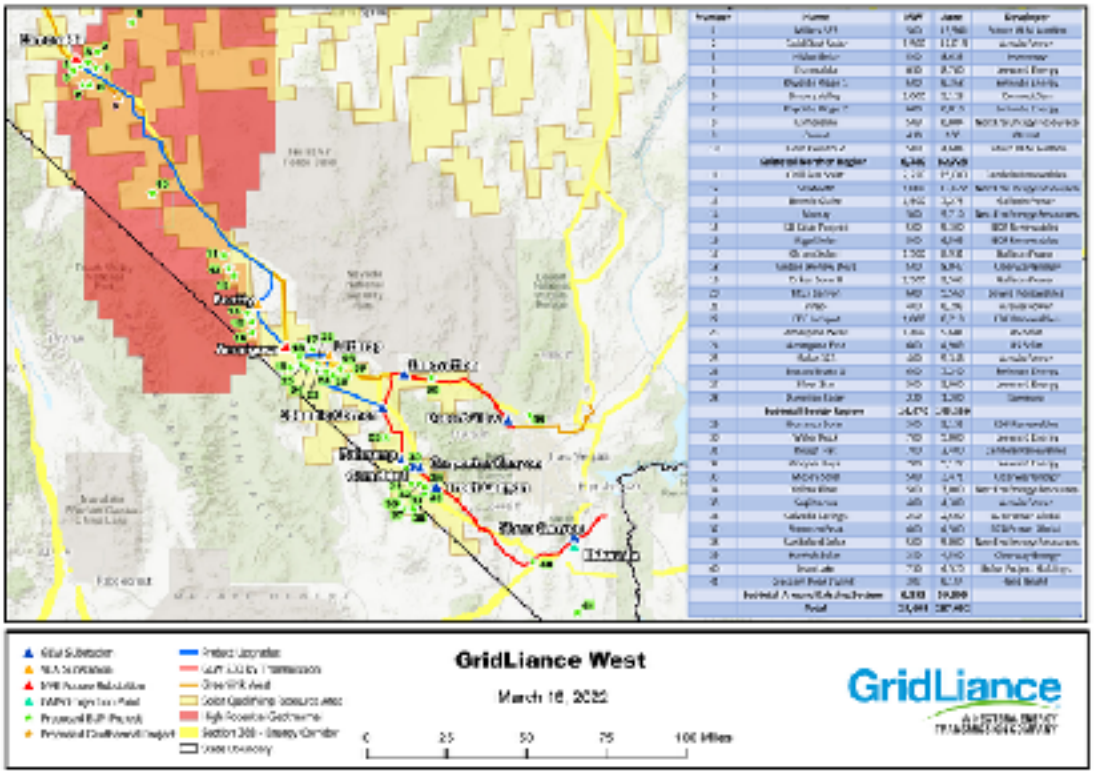


Figure 1: Comprehensive Map of Expressed Commercial Interest in the Southern NV Region of CAISO.

These facts are further supported by the California Energy Commission's (CEC's), California Public Utility Commission's (CPUC's), and CAISO's own findings in RETI 2.0 which identified the region as having "… some of the highest energy resource potential, commercial interest, and advanced planning examined in RETI 2.0."

[1]Formatted Generator Interconnection Report: https://rimspub.caiso.com/rimsui/logon.do

SUMMARY OF CONTENT

Considering commercial interest in addition to the region's potential for positively impacting grid reliability and ensuring resource adequacy, C.O.R.D. believes the importance of the renewable resources procured from the Southern Nevada region of CAISO and their resilience benefits to CAISO's grid's geographic diversity cannot be overstated. Geographical diversity should be one of most important factors that California considers as it continues its efforts to meet the GHG reduction and increased RPS policy goals. As a result, C.O.R.D. shares Gridliance West's concerns with the resource planning portfolios should the current WECC Environmental Risk datasets be used to identify suitable land for development in the Southern Nevada region of CAISO in place of the more granular and specific land-use screens the CEC is enhancing within the geographic boundaries of California. Additionally, C.O.R.D. would like to ask the CEC to consider developing wildfire risk as a potential land-use screen to be applied universally within the geographic boundaries of California and the Southern Nevada region of CAISO.

LAND-USE SCREENS IN THE SOUTHERN NV PORTION OF THE CAISO

The WECC Environmental Risk Dataset's Risk Classification Categories[2] are comprised of a wide variety of land designations within each level. As a result, C.O.R.D. is concerned with potential generalizations that could result in the exclusion of land that would otherwise be determined suitable depending on its Environmental Risk Category rather than its more specific

[2] https://ecosystems.azurewebsites.net/WECC/Environmental/images/class_descrip.jpg

land designation. For example, the lands designations comprising WECC Environmental Risk Category 3 have varying levels of mitigation requirements, some more complicated than others. Without specific details on how land exclusions would be made for the category and the inability to identify the specific land designations represented in the mapping for the WECC Environmental and Cultural Data Inventory[3], C.O.R.D.'s concern is that differentiation between lands would be impossible and as a result, all of the lands in the category could be treated as though they require the most stringent mitigation requirements and be excluded from potential use regardless of existing commercial interest and a developers willingness to carry out potentially lesser requirements for mitigation. See Figure 2 for a detailed map showing WECC Risk Categories overplayed on commercial interest in the region.

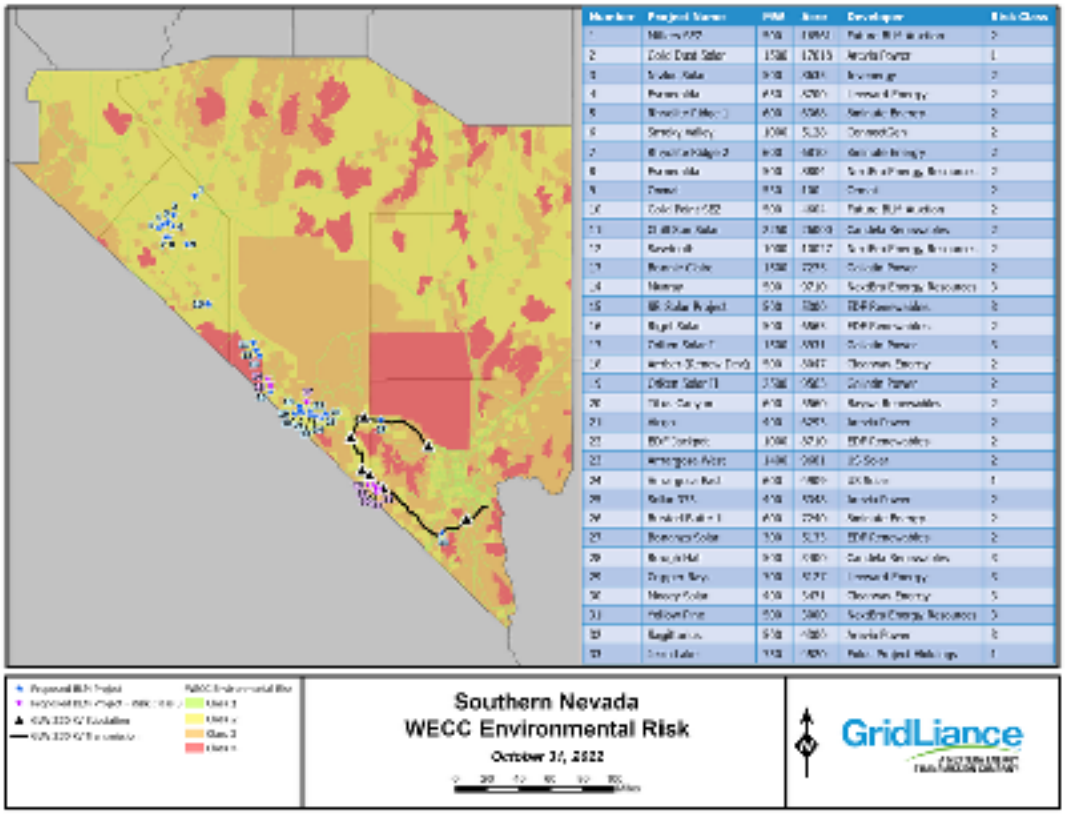


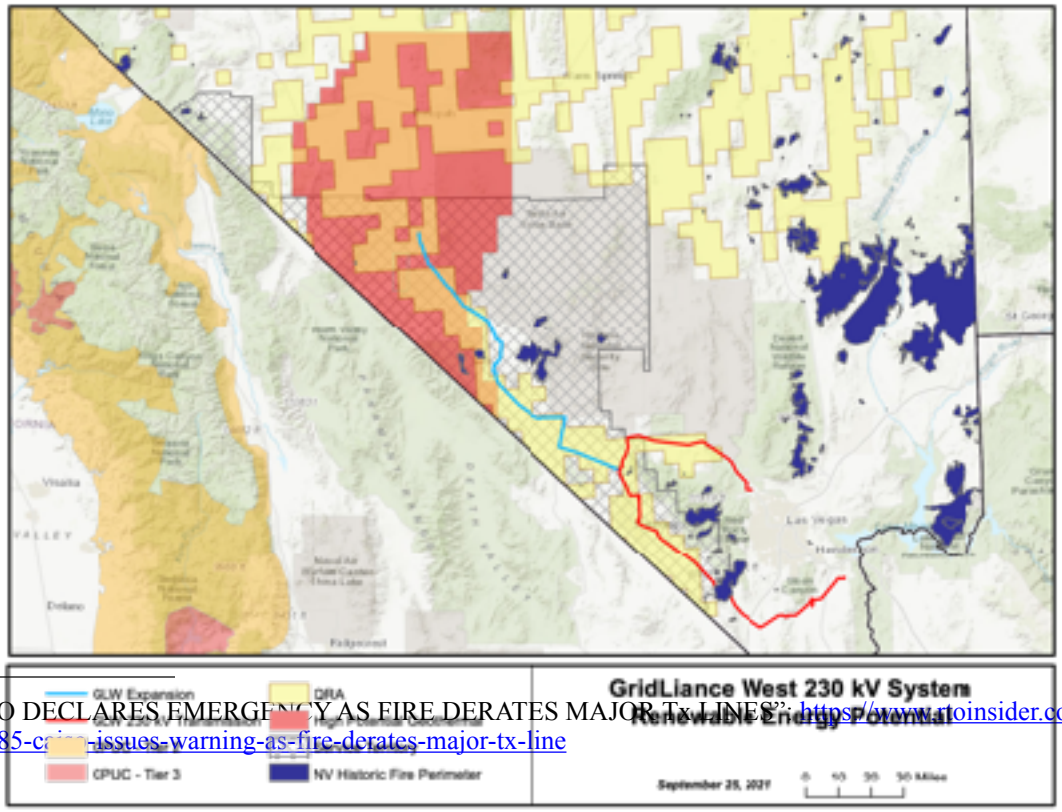
Figure 2: WECC Env. Risk Categories & Commercial Interest in the Southern NV region of CAISO

[3] https://ecosystems.azurewebsites.net/WECC/Environmental/

With that in mind, C.O.R.D. supports Gridliance West's request to provide data that would allow the CEC to use to employ compatible land-use screens metrics for the Southern Nevada region of CAISO to those the CEC has proposed in California.

WILDFIRE RISK AS AN ADDITIONAL LAND-USE SCREEN

California should pay increased attention to the Southern Nevada region of CAISO in light of increasingly burdensome environmental factors such as increased wildfire risk to transmission and suitable land for renewable development in other areas of the grid. As evidenced by recent events such as the derating, from 4800 MW to 428 MW, of the California Oregon Intertie (COI/ Path 66) due to the impact of the Bootleg fire that burned in early July 2021 and the resulting intermittent loss of firm hydropower resources from the Pacific Northwest[4], wildfire risk is becoming increasingly relevant year after year.



[4] "CAISO DECLARES EMERGENCY AS FIRE DERATES MAJOR Tx LINES": https://www.rtoinsider.com/articles/28185-caiso-issues-warning-as-fire-derates-major-tx-line

Figure 1: Map of GLW's Renewable Energy Potential, Fire-threat risk, and historic fire perimeter in NV.

The Southern Nevada region of the CAISO grid is subject to much less potential fire-risk comparatively than a vast majority of CAISO's grid as demonstrated in the CPUC's Fire-Threat map[5], Nevada Division of Forestry's Wildfire Threat map[6], and illustrated in Figure 1.

C.O.R.D. believes this lower fire risk makes the Southern Nevada region of the CAISO's future resource and infrastructure development even more cost-effective and makes it an important hedge against the devastating impacts of future climate change-related wildfires to California's grid. With that in mind, C.O.R.D. requests the CEC consider adding wildfire-risk as an additional land-use screen that can be uniformly applied across the geographic bounds of California and the Southern Nevada region of CAISO using historical fire risk data from both California and Nevada. C.O.R.D also recommends that the CEC collaborate with theCPUC to work toward incorporating impacts of fire risk ito RESOLVE such that the underlying portfolios can factor in this risk trade-off in resource siting, even up front of the regular land-use screening processes. .

SUMMARY

C.O.R.D. appreciates the effort from the California Energy Commission, California Public Utilities Commission, and the California Air Resources Board put into developing the

[5] https://capuc.maps.arcgis.com/apps/webappviewer/index.html?id=5bdb921d747a46929d9f00dbdb6d0fa2

[6]https://nevadaresourcesandwildfireinfo.com/Map/Public/#whats-your-risk

updated land-use screens. C.O.R.D. also appreciates the the opportunity to provide input on the Land-Use Screen Workshop in Docket: 22-IEPR-02.

Dated: October 31, 2022

Respectfully submitted,

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