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## WSP comment to Commissioner Workshop on Renewable Progress, Challenges, and Opportunities

*Additional submitted attachment is included below.*

WESTLANDS SOLAR PARK

May 26, 2015

Westlands Solar Park comments to the May 11, 2015 CEC workshop on "Renewable Progress, Challenges, and Opportunities":

**California should create mechanisms to incentivize utilities to develop renewable resource areas in a more coordinated manner, aligning the needs of transmission and generation planning together, and supporting business strategies that maximize long-term value for ratepayers.**

The current method of developing large renewable energy projects is inefficient and wastes time, money and resources of the developer and the regulatory agencies.

This inefficiency occurs due to the lack of proper planning in both siting of renewable generation and routing of transmission at both the local and state level.

Currently developers waste more time and money seeking to secure options on land, and interconnections from the CAISO - while simultaneously trying to obtain power purchase agreements and financing to keep their projects moving forward. Developers that are not able to successfully complete even one of these milestones are left with projects that cannot get financed or built.

No one wins when a project is not built, and everyone loses since the capital that was raised for the development costs cannot be recouped unless a project is built. While proponents that support the status quo argue that "developer risk" is a fundamental part of the process of building renewable energy projects, we believe that ignoring the costs that are layered into the current process is unfair to ratepayers and ultimately leads to projects that are built because they are too far along to fail, not because they are the best projects.

Furthermore, under the current process the regulatory agencies have to expend tremendous amount of time and energy processing applications that may never be built. Lastly, the current process creates an uneven playing field in favor of developers who have the time and money to constantly reengage with regulators and policymakers to build renewable energy projects that may be opposed by communities and or environmental groups because they are improperly cited.

In order to address the inefficiencies, inequities, and environmental cost that is endemic to the existing process, we propose that the following measures be adopted by the regulators to improve the means by which California's achieves its goal for increased renewable generation:

- Require the CAISO to study as policy transmission lines all the foundation lines identified in the RETI stakeholder process. This is important since RETI identified these foundation lines as multi purpose and multi beneficial transmission lines which would reduce the risk of stranding assets.

- Require the CPUC to move beyond only analyzing renewable resource portfolios purely based on PPAs and interconnection agreements and instead incorporate land use planning principles and least harm environmental standards in the analysis.

- Allow utilities to consider pre permitted land as eligible to be bid into the renewable solicitation process. This will incentivize developers to work with landowners, local and state governments, and the CAISO to plan for the long-term development of areas of the state for renewable generation. The current process discourages developers to think about long term planning and instead rewards them for finding immediate capacity on existing transmission and permitting land near existing substations regardless of the environmental impacts or costs.

- The regulators and utilities should be required to incorporate environmental costs in the least cost -best fit determination process. The environmental mitigation costs are a growing, yet largely avoidable, component of the overall costs for large renewable projects. The goal of minimizing mitigation costs should become a greater consideration as the availability of large areas of land becomes finite, and doing so would allow developers to reduce the associated costs in their bids to the utilities.