

DOCKETED

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Comments of SCE on IEPR Workshop Held 8-3-15 re Landscape-Scale Planning

Additional submitted attachment is included below.

August 17, 2015

California Energy Commission
Docket Office, MS-4
Re: Docket No. 15-IEPR-08
1516 Ninth Street
Sacramento, CA 95814-5512
docket@energy.ca.gov

Re: Southern California Edison Company's Comments on the California Energy Commission Docket No. 15-IEPR-08: Commissioner Workshop on Landscape-Scale Environmental Evaluations for Energy Infrastructure Planning

Dear Commissioner McAllister:

On August 3, 2015, the California Energy Commission (Energy Commission) held a Workshop on Landscape-Scale Environmental Evaluations for Energy Infrastructure Planning ("the Workshop") as part of the 2015 Integrated Energy Policy Report ("IEPR") Proceeding. Southern California Edison (SCE) participated in the Workshop and appreciates the opportunity to submit these written comments, which provide support for: (1) the Energy Commission's continued efforts to incorporate landscape-scale analysis into transmission planning, and (2) other California energy agencies' efforts to identify new transmission to interconnect high quality renewables through the Renewable Energy Transmission Initiative (RETI) 2.0 process.

A. SCE Supports California Energy Agencies' Coordination to Incorporate Landscape-Scale Evaluations into Energy Infrastructure Planning in Support of Long-Term Environmental Policy Goals.

SCE supports the Energy Commission's efforts to more effectively incorporate land-use and environmental considerations into scalable energy infrastructure planning processes, including transmission planning and energy resource procurement. SCE believes this effort is essential to responsibly meeting California's long-term greenhouse gas (GHG) emission reduction goals.

SCE recommends that the Energy Commission utilize an approach for energy infrastructure planning that incorporates reputable environmental science and technologies as early as possible in planning processes. Such an approach will lead to more informed decision-making and guide the siting of renewable resources—and the electrical upgrades needed to support them—to viable and less environmentally sensitive areas. In addition, a strong coordinated effort among the Energy Commission, California Public Utilities Commission (CPUC), State Resource Agencies and the California Independent System Operator (CAISO) is necessary to ensure such success. Although the Desert Renewable Energy Conservation Plan (DRECP) serves as a good model,

efforts should be expanded throughout California to provide greater opportunities and flexibility for planning beyond the California desert.

B. SCE Supports the Upcoming RETI 2.0

SCE continues to support, and has actively participated in, comprehensive transmission efforts, including the first RETI, and the DRECP Transmission Technical Group. SCE also supports, and looks forward to actively participating in the upcoming RETI 2.0 initiative, which will be established through a joint effort among the Energy Commission, CPUC, and CAISO.¹ The RETI 2.0 Initiative aims to identify new transmission to interconnect high quality renewable resources. SCE agrees with the Energy Commission and CPUC that, while challenging, RETI 2.0 will show that regional integration can lead to lower priced electricity and greater reductions in GHG²—thereby supporting the state’s long-term goals for reducing GHG emissions 40% below 1990 levels by 2030.

In conclusion, SCE appreciates the Energy Commission’s consideration of these comments and looks forward to its continuing collaboration with the Energy Commission. Please do not hesitate to contact me at (916) 441-2369 with any questions or concerns you may have. I am available to discuss these matters further at your convenience.

Very truly yours,

/s/ Manuel Alvarez

Manuel Alvarez

¹ See: Letter to Stephen Berberich from Energy Commission and CPUC, re: RETI 2.0 Initiative, July 30, 2015.

² *Id.*