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AECA Comments:follow-up on Aug 3 workshop

Additional submitted attachment is included below.

Agricultural Energy Consumers Association

California Energy Commission
Dockets Office, MS-4
RE: Docket No. 15-IEPR-08
1516 Ninth Street
Sacramento, CA 95814-5512

RE: Agricultural Energy Consumers Association Comments on the 2015 Integrated Energy Policy Report: Transmission and Landscape Scale Planning

Dear Commissioners,
Agricultural Energy Consumers Association ("AECA") appreciates the opportunity to provide these comments as follow-up to the August 3, 2015, Integrated Energy Policy Report ("IEPR") workshop on landscape transmission planning. AECA's comments are focused on answering the staff's inquiries regarding right sizing transmission projects generally, and the reliability and economic benefits of right sizing the San Luis Transmission Project ("SLTP"), which is currently undergoing environmental review, specifically.

AECA represents the collective energy interests of the state's leading agricultural organizations, farmer cooperatives, individual growers and agricultural water agencies. AECA's interest in this proceeding is straight forward; ensuring the reliability and sustainability of the state's transmission system that serves the state and federal water projects and agricultural rich San Joaquin Valley, and ensuring sufficient transmission capacity exits to unlock the renewable energy potential of the region. The San Joaquin Valley is rich in renewable energy opportunities including bioenergy from livestock and agricultural waste as well as increasing opportunities to site large scale solar projects on marginal and degraded farmlands. These opportunities are widely recognized by the Brown Administration which is seeking to expand these resources as evidenced by recent investments in bioenergy projects and the convening of stakeholders to identify least conflict opportunities for solar development in the region.

California's energy sector is in the midst of a major transition to renewable resources. If transmission planning decisions are not made in a timely fashion, opportunities for renewable energy development in the region will be missed, along with the broad environmental and economic benefits they can provide for the region.

Transmission planning and development can take a decade or longer. As a consequence, if energy policymakers are not currently planning for and identifying necessary transmission infrastructure to unlock renewable energy development in the San Joaquin Valley we will not see the economic and environmental benefits for 12 to 15 years or longer. State energy policymakers including the California Energy Commission, California Air Resources Board

("CARB") and the California Public Utilities Commission ("CPUC") must plan for, permit and develop necessary transmission upgrades that will enable the state to provide efficient, reliable and non-discriminatory transmission service. Equally important, recognizing and acting on opportunities to "right size" transmission facilities as required by the Garmendi Principles, will provide adaptability, optionality and flexibility as the state heads into an ambitious but highly uncertain clean energy future.

AECA strongly supports the concept of "right sizing" transmission facility upgrades. The agricultural community sees multiple benefits in the development of additional transmission facilities to provide reliability and resource adequacy benefits to the states valuable farming regions. AECA also recognizes "right sizing" provides tremendous long-term economic and environmental benefits, reduced interference with and impacts to agricultural lands, as well overall generation cost savings through the enhanced dispatch of available renewable resources. Finally AECA also views "right sizing" as an important insurance policy or hedge against unforeseen customer costs such as those experienced as part of energy deregulation over a decade ago; costs we are still paying for today.

The San Joaquin Valley is a key transmission corridor for California and western states. Additional transmission facilities in the region would ease congestion and enhance the movement of power throughout the state. Equally important, additional renewable energy facilities will provide enhanced export opportunities and much need economic development in a region plagued by chronic double digit unemployment and high rates of poverty.

The staff's questions regarding "right sizing" issues are especially timely as the state embarks on clean energy goals that will easily need to exceed 50-60 percent renewable resources by 2030 to meet ever more ambitious greenhouse gas reduction targets. California energy policy makers will need to look far beyond current 10-year transmission planning horizons and recognize the value in both time and money provided by longer-term planning efforts. Put simply, given the long lead time for transmission projects, unless decisions are made soon, the state's renewable energy goals will go unmet.

The staff's questions regarding "right sizing" transmission facilities are also timely in light of the current brief window available to "right size" the proposed San Luis Transmission Project ("SLTP"). The SLTP is a proposed Western Area Power Administration new 62 mile high voltage transmission line to connect Western's existing transmission system near Tracy with federal water pumping operations in Los Banos. The project is currently undergoing environmental review. The line is designed to enhance delivery of low cost Western power for use in transporting water to bay area residents and San Joaquin and Central Coast farms. Federal water customers will only require 230 kV line but the project can and should be "right sized" to 500 kV to take full advantage of the last remaining space in the existing transmission corridor. Failure to act soon on this right sizing opportunity will cost energy ratepayers substantially more in the long-term to site additional facilities in the future. The decision to "right-size" the SLTP now will also eliminate the environmental and agricultural impacts of needing to identify and develop a new corridor in the future. Which is why the

project is supported by over 50 water agencies, farm groups and energy stakeholders as well as 20 bipartisan state legislators and members of Congress from the San Joaquin Valley and Central Coast.

In conclusion, state energy policymakers must more effectively and efficiently plan for additional transmission facilities to serve the San Joaquin Valley and provide economic and environmental benefits for the entire state. AECA strongly supports these right-sizing efforts because they will save ratepayers money in the long-term and better position the San Joaquin Valley for renewable energy expansion. AECA also strongly encourages the CEC and other state energy policymakers to recognize and act on the fleeting opportunity to "right-size" the SLTP and ensure the San Joaquin Valley benefits from this and other necessary projects to unlock the renewable energy potential of the region.

Sincerely,

Michael Boccadoro
Executive Director