

## DOCKETED

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August 17, 2015

**RE: Westlands Solar Park LLC comments to the CEC August 3, 2015 IEPR Workshop on Landscape-Scale Environmental Evaluations for Energy Infrastructure Planning and the Strategic Transmission Investment Plan**

The Westlands Solar Park (WSP) is the fifty-fifth designated competitive renewable energy zone (CREZ) designated under the Renewable Energy Transmission Initiative (RETI) stakeholder process. The WSP was designated as the last CREZ by RETI in the Phase 2B issued in April 2010. RETI identified WSP as the only solar photovoltaic region in the San Joaquin Valley capable of generating up to 5,000 megawatts as a result of the 30,000 or more acres of impaired farmland in the Westlands Water District.

***WSP Master Planning Effort Begins on March 13, 2013*** – In March of 2013 the Westlands Water District (i.e. District) launched one of the largest programmatic environmental impact reports (PEIR) for master planning renewable energy development and transmission planning outside of the Desert Renewable Energy Conservation Proceeding (DRECP).

***History of Drainage Impaired Farmland in Westlands and the connection to the WSP Master Plan*** - The entirety of the WSP CREZ is located in the District and consists of cultivated agricultural land. All of the lands within the WSP master plan area are formally recognized as “drainage impaired” by the U.S. Bureau of Reclamation. The accumulation of naturally occurring salts combined with high groundwater conditions has created severe limitations on agricultural land capability. Due to lack of agricultural drainage facilities, these near surface soil conditions limit crop choices to salt tolerant and lower value crops. The District has identified these drainage-impaired lands for retirement from irrigated agriculture. Once retired, these lands would no longer be eligible to receive surface water deliveries. As non-irrigated lands, all of the soils within the WSP are classified by the Natural Resources Conservation Service (NRCS) as having a Land Capability rating of VII, indicating non-prime agricultural soils.

The WSP Master Plan is intended to fulfill the goals of the Westlands Solar Park project by doing the following:

1. To provide a comprehensive and cohesive planning document to guide and facilitate the beneficial reuse of drainage-impaired lands through development of renewable energy generation in the Westlands CREZ.
2. To establish the preferred transmission corridors routes through the District. Selection of these routes would provide renewable energy generation deliveries from drainage-impaired lands to the State electrical grid.

Some of the specific objectives of the WSP Master Plan are too:

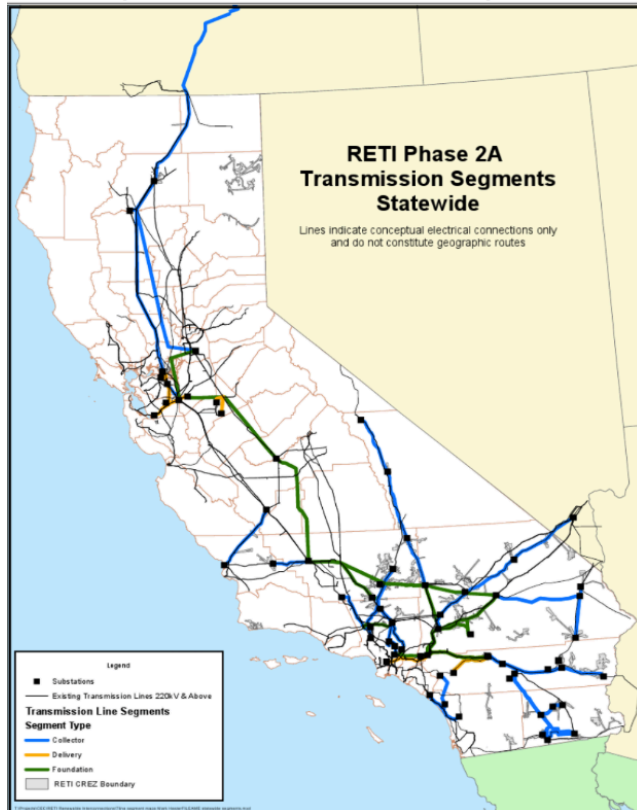
- Contribute to the solution of area-wide agricultural drainage problems by retiring the WSP site from irrigated agriculture.
- Provide for the economically viable and environmentally beneficial reuse of the site's physically impaired agricultural soils.
- Facilitate the redirection of scarce surface water allocations from the WSP plan area to more productive agricultural land that is not physically impaired by saline soils, high groundwater, or selenium contamination.
- Provide utility-scale power generation on physically impaired farmland in order to reduce pressure for renewable energy development on prime agricultural soils elsewhere.
- Provide a large utility-scale solar generation facility on highly disturbed land, which provide minimal habitat value for wildlife.
- Provide a low-impact alternative location for the siting of utility-scale renewable energy development that might otherwise occur on land with high habitat value for protected wildlife species.
- Provide utility-scale solar generation in a location that is already traversed by high-voltage transmission lines.
- Adopt a transmission route that achieves the primary objectives of this transmission facility in a manner that results in the least impacts to the environment and the agricultural community.

***Transmission in the San Joaquin Valley is constrained and RETI identified this region as important to plan for a foundation line in order meet current and future renewable goals. Any landscape planning effort needs to focus on rightsizing the bulk transmission system in the valley to meet future reliability and renewable energy needs from this region*** – In the RETI stakeholder process a foundational line (marked in green in Figure 3 below) was identified as necessary for the central valley for the state to meet its renewable energy goals. Paraphrasing the RETI Phase 2A report description of the necessity of renewable foundation lines it said that these lines increase the capacity of the California transmission network across the state allowing energy to flow north or south as needed. They allow energy from almost all identified CREZ to reach load centers throughout the state and the usefulness of the Foundation Group is not limited to renewable energy since the increased capacity these lines provide is likely to needed to meet growing energy demand regardless of generation sources.

The WSP Master Planning effort seeks to push forward the need to plan and eventually develop the Foundation lines in the Central Valley to meet both the future reliability needs in the region and the renewable energy development opportunities in the WSP CREZ. Any landscape planning effort for renewable generation and transmission should be looking at opportunities to plan and build multi-value transmission lines that benefit reliability, renewable energy delivery, and unlock new renewable energy zones.

Right sizing transmission is imperative in California given the difficulty of permitting new transmission corridors. The CAISO and the CPUC should initiate a special study for San Joaquin renewables that considers the need to upgrade or expand the existing 500 kV transmission network to meet future reliability and renewable generation needs necessary to deliver up to 4,000 MW of solar from the region.

Figure 3. Conceptual RETI Transmission Segments.



### ***Landscape Planning is Valuable Tool for Policymakers***

- landscape planning is valuable in identifying areas of least conflict lands for renewable energy and transmission development.

The WSP Master Plan is a locally driven landscape planning effort that coordinates both transmission and renewable generation in a comprehensive permitting effort.

When completed the WSP PEIR will create more permitting certainty for renewable developers and transmission planning agencies.

Landscape planning was successful in the Tehachapi renewable energy collaborative and that process eventually established 4,000 megawatts of wind and solar generation and the necessary transmission infrastructure upgrades to the region, thereby allowing the State to meet its current renewable energy goals. Policymakers can use the same tools from the successful Tehachapi planning model to unlock thousands of megawatts of solar in the San Joaquin with minimal environmental and agricultural impacts.

***The CEC should explore ways to utilize its corridor transmission planning authority under SB 1059 to coordinate and partner with local and federal government agencies, especially in regions where there are multiple proposed transmission projects, as in the San Joaquin Valley*** – The San Joaquin Valley region currently has two active transmission projects being planned in addition to the transmission corridor permitting effort by the Westlands Water District. The two active transmission projects are the Gates-Gregg project and the San Luis transmission project.

It would be most efficient if the CEC under its SB 1059 authority could bring the utilities, the CPUC and CAISO, WAPA Sierra Nevada region office, and the local governments together to coordinate the transmission planning strategy for the San Joaquin region that best adheres to the Garamendi principles and right sizes the proposed transmission improvements, thereby minimizing the need to create new transmission corridors.

***Conclusion*** – On behalf of the WSP, we ask the CEC to do the following to help speed the planning and development of renewable generation opportunities in the San Joaquin valley:

1. Ensure that the 2015-16 CEC, CPUC recommended renewable portfolios for the Westlands CREZ is at minimum 4,000 megawatts (this amount is in line with what was planned in Tehachapi). No landscape planning effort can proceed in the central valley if the renewable portfolios do not reflect the full development potential of the San Joaquin region.
2. Landscape planning for transmission needs to consider the State and the Central Valley needs beyond a ten-year horizon.
3. The CEC should coordinate with the utilities, the federal agencies like WAPA, and the local agencies in the San Joaquin like Westlands on developing a transmission strategy that looks at right-sizing multi-value lines, like the ones necessary for the Central Valley, and coordinating transmission planning to avoid redundant systems.