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IMPERIAL IRRIGATION DISTRICT COMMENTS

Imperial Irrigation District appreciates the proactive approach adopted by the California Energy Commission and the California Public Utilities Commission in their efforts to aid California in achieving its renewable and greenhouse gas goals by prompt initiation of the RETI 2.0 process. IID's service territory is one rich with renewable resource potential for geothermal, wind, solar, and biomass. The location of such abundant resources makes IID an essential component to helping California achieve its renewable and greenhouse gas emission goals. IID intends to be a willing, collaborative and actively engaged participant in the RETI 2.0 process.

IID is mindful that such a large undertaking requires a collaborative process among many stakeholders. To that end, IID supports an open and transparent planning process that keeps in mind the best interests of California. It is likely that additional transmission will be important in helping to meet the State's energy goals. Any additional transmission will bring with it an obligation to meet the state's goals of lowering greenhouse gas emissions, minimize environmental impacts, and compatibility with local land use plans. In that respect, while regional coordination and collaboration is important, a closer look at the location and availability of in-state resources and existing infrastructure is critical. To achieve its RPS goals, California will be challenged to integrate a tremendous amount of renewable energy in a very short time period. Looking to known resource areas with existing unused or underutilized transmission will facilitate expedited development with the least environmental and financial impact. Further, use

of existing capacities for interconnection of renewable generation will allow for additional generation on systems operated by the CAISO.

California's progressive policy can also foster much needed employment. While other states across the nation have shown signs of economic recovery, California continues to suffer from double digit unemployment. Investments in renewable energy can serve as a catalyst for business development and job creation, both needed to spur recovery.

The success of any process is in large measure dependent upon a clear and comprehensive scope including milestone dates and deliverables. An alignment of all state planning and procurement processes must occur in order to achieve maximum effectiveness and efficiency. The rapid approaching RPS increase presents a unique opportunity for all state agencies, stakeholder groups, developers and balancing authorities to work together to help California achieve not only its energy policy objectives, but cultivate an environment conducive to business development and job creation IID looks forward to supporting the effort.

Contact:

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Robert A. Laurie Assistant Counsel, Energy ralaurie@iid.com