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Conservation Organization Comments to 11/2 RETI 2 Workshop

Additional submitted attachment is included below.



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Date: November 19, 2015

Subject: Comments to the Joint Agency Workshop on the Proposed Organization Structure and Work Plan for the Renewable Energy Transmission Initiative 2.0 (November 2, 2015)

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I. Introduction and Summary

The Nature Conservancy, Defenders of Wildlife, Sierra Club, and Natural Resources Defense Council ("Conservation Organizations") respectfully submit these comments to the Joint Agency Workshop on the Proposed Organization Structure and Work Plan for the Renewable Energy Transmission Initiative (RETI) 2.0, held on November 2, 2015.

We strongly support the ongoing work of the California Governor's Office, the California Energy Commission (CEC), the California Public Utilities Commission (CPUC), the California Independent System Operation (CAISO) and California's county governments to align renewable energy development and transmission planning with natural resource protection. RETI 2.0 presents an opportunity to coordinate these processes¹ and ongoing efforts like the San Joaquin Valley Solar Convening through the Databasin platform in support of a sustainable, low carbon energy future.

¹ Examples of processes include, but are not limited to: CPUC's Long Term Procurement Plan, CPUC's RPS Calculator, CAISO Transmission Planning Process, Integrated Energy Policy Report, Desert Renewable Energy Conservation Plan (Phase I and Phase II), and local planning efforts for renewable energy and conservation.

Achieving a low carbon energy future is critical for California – for our economy, our communities and the environment. Key to this future is not only a rapid decarbonization of the energy and transportation sectors, but also protecting and managing the natural and working lands that provide for the conservation of species and habitat as well as other important co-benefits such as carbon sequestration², water quality and water supply.

The comments below are informed by our respective experiences as participants in stakeholder-driven non-regulatory and regulatory processes.

II. Organization Structure

The November 2 workshop presentation³ outlined the proposed structure for the RETI 2.0 process, including an Environmental and Land Use Technical Group, a Transmission Technical Group, and a Plenary Group.

We appreciate that the proposed RETI 2.0 structure will create and promote an open, transparent, stakeholder process. Likewise, we appreciate that this is codified as an objective of RETI 2.0⁴. As follows, we offer recommendations to the proposed organization structure that are made with the intent of supporting the objective of an open, transparent stakeholder process, and are mindful of the RETI 2.0 planning timeframe.

Environmental and Land Use Technical Group

We recognize the opportunity that a single Environmental and Land Use Technical Group will afford for multi-sector dialogue and discussion; however, we are concerned that a single Environmental and Land Use Technical Group may make efficient decision-making difficult. We encourage the CEC and CPUC (Joint Agencies) to consider the example of the San Joaquin Valley Solar Convening, which demonstrated efficiency in achieving the objective of the planning process within the planning timeframe. In that instance, there were separate work groups to consider data and priorities in identifying least conflict lands. We encourage the Joint Agencies to build flexibility into the construct of the Environment and Land Use Technical Group that would allow for smaller working groups, or sub-groups, comprised of subject-matter experts and staff from relevant agencies, to work through the specific values that define what is considered “lower conflict” lands – e.g., conservation, agriculture, ranching, etc.

² http://www.arb.ca.gov/html/fact_sheets/nwlfactsheet.pdf

³ Renewable Energy Transmission Initiative 2.0 Organizational Structure and Work Plan, California Energy Commission and California Public Utilities Commission Joint Workshop. November 2, 2015.

⁴ Renewable Energy Transmission Initiative 2.0 Organizational Structure and Work Plan, California Energy Commission and California Public Utilities Commission Joint Workshop. November 2, 2015. Slide 3.

Transmission Technical Group

The Transmission Technical Group should consider, in addition to the best available information on transmission capacity, capacity from potential fossil fuel retirements. In addition, the goals of the Transmission Technical Group should include consideration of the means by which non-wires alternatives, local clean energy and energy-only will be considered and prioritized; and how they will in turn impact needed transmission. We encourage the TTG to incorporate the results of the CAISO's recent special study considering the impacts of planning for energy-only resources in achieving 50% renewable energy.

III. RETI 2.0 goals and objectives should be clarified

We appreciate the proposed goals and objectives that have been identified for the overall RETI 2.0 initiative, as well as the specific workgroups, including Environmental and Land Use. However, it is important that the goals and objectives are clear and specific to ensure that they can be accomplished within the ambitious planning timeframe.

RETI 2.0 Objectives

The RETI 2.0 objectives outlined during the workshop will benefit from consistency and clarity. For example, the presentation makes multiple different references to "statewide GHG goals," "California's 2030 climate and renewable energy goals," and "2030 GHG goals." The RETI 2.0 work plan would be improved by clearly identifying the target or policy goal(s) that the "combinations" should explore, and then use a standard vernacular throughout.

In addition, although we understand that the intent with RETI 2.0 is to focus primarily on the large-scale component of the state's greenhouse gas reduction efforts through 2030, that component has still not been clearly identified as noted above. In addition, in a rapidly-changing technological and cost environment, the relative contribution of large-scale renewable energy will fluctuate over time. This plan should be constructed with clear, least-impact priorities that enable ramping up or down in transmission and buildout depending on those technological changes and their adoption. To put it more simply: the approach to transmission investments should be phased, focusing first on using or repurposing existing transmission for new least-impact projects, then on adding more lines to existing poles, then new lines in existing corridors and finally on wholly new lines focused in lowest-impact locations serving lowest-impact areas for new generation.

Environmental and Land Use Technical Group Goals and Objectives

The Environmental and Land Use Technical Group goals and objectives outlined on slide six⁵ of the Joint Agency presentation should be re-scoped and clarified. The presentation states that “the group will assist RETI 2.0 participants in assessing environmental and land use considerations related to possible locations for renewable energy development.” This statement does not represent a clear goal that is actionable by technical group members.

We recommend that one of the essential goals of the Environmental and Land Use Technical Group be to identify “lower conflict” lands for electricity infrastructure (e.g., generation facilities, transmission) planning. “Lower conflict” must be clearly defined so that the Environmental and Land Use Technical Group has clear guidance as they start the identification process. From the Conservation Organization perspective, in order to identify “lower conflict” lands, the group must identify those natural and working lands pivotal to provide for the conservation of species and habitat as well as other important co-benefits such as carbon sequestration, water quality and water supply. Conservation should be defined as those lands essential to keep species and ecosystem processes viable over the long-term. In many cases, important conservation lands may already have been identified through federal, state, or local conservation planning processes. It is only after identifying those important conservation lands that the group will be able to identify “lower conflict” lands.

While our comments are focused on species and ecosystem conservation, there are other aspects of the definition of “lower conflict” lands that should include avoiding lands important for agriculture, ranching, cultural importance, and other land use values important to individual counties.

RETI 2.0 should also identify those areas in which species/habitat conservation strategies do not currently exist and where data gaps exist. It is important to identify those gaps to focus attention and analysis, or to identify risk associated with any future decision-making. For example, the northern Sacramento Valley has not undergone the level of conservation planning as conducted through the Desert Renewable Energy Conservation Plan (DRECP) and the San Joaquin Valley Solar Convening and may require additional detailed attention and analysis by the Environmental and Land Use Technical Group.

Lastly, RETI 2.0 has an important platform to demonstrate the ability of a non-regulatory planning process to incorporate wildlife and habitat conservation needs in guiding public

⁵ Renewable Energy Transmission Initiative 2.0 Organizational Structure and Work Plan, California Energy Commission and California Public Utilities Commission Joint Workshop. November 2, 2015. Slide 6.

investments in electricity infrastructure planning. This opportunity should be codified in an actionable goal from the outset, as outlined above.

IV. The work plan should clarify the decision-making process

We appreciate the early work plan and timeline that were presented at the workshop. The next iteration of the work plan should clarify the decision-making process and who holds the decision-making authority (e.g., stakeholder-driven consensus, agency oversight staff, executive branch appointees). During the planning process, decisions should be transparently documented to ensure that all stakeholders can understand how the decisions were derived.

V. Joint agency investments in facilitation and project management will be essential to RETI 2.0 completion

Facilitation and project management will be essential to completing this ambitious planning process within the outlined schedule. There needs to be a clear investment in project management to effectively run this process with multiple stakeholders and points of input (e.g., data identification, data gathering, data inputs, modeling, prioritization, “combination” creation).

VI. To be most effective the RETI 2.0 outputs must be actionable

While non-regulatory, in order to be most effective, the RETI 2.0 process must be aligned with each of California’s energy and transmission planning processes. These include the CAISO’s annual Transmission Planning Proceeding, the CPUC’s RPS Calculator, the CPUC’s Long-term Procurement Planning Proceeding, the individual IOUs’ renewable energy procurement, and the Integrated Resource Proceeding and other commitments included in Senate Bill 350. Individually, none of these processes will affect the goals of developing renewable energy at the speed necessary to decarbonize the grid. Most significantly, to date, California utilities’ procurement has not aligned with areas widely supported for renewable development (the Westlands Solar Park is a prime example of this, as is geothermal development at the Salton Sea). The timing of RETI 2.0, together with the imminent finalization of the DRECP Phase I and the San Joaquin Valley Solar Convening, presents a rare opportunity to realize the state’s work to date by valuing the areas identified in these processes in the utilities’ procurement.

VII. The RETI 2.0 Process should focus first on ongoing or complete planning processes

The RETI 2.0 process should focus first on lands where renewable energy production should serve environmental benefits and have been identified as lower conflict through a

robust planning process. We were pleased to see Commissioner Douglas note that the first task of RETI 2.0 will be developing the pathway for solar on low-impact, consensus lands in the San Joaquin Valley identified in the San Joaquin Valley Solar Convening. We were also pleased that Commissioner Douglas identified that a second priority would be renewable energy development at the Salton Sea, which has also been the subject of extensive environmental planning through the Salton Sea restoration efforts, the DRECP, and Imperial County's general plan update for its renewable energy element. Developing geothermal at the Salton Sea will provide environmental benefits as it will reduce the amount of playa exposed as the Sea recedes. Additionally, developing this geothermal resource will provide air quality benefits by reducing the need for natural gas plants.

III. Conclusion

We appreciate the opportunity to participate in this process. RETI 2.0 presents an opportunity to rapidly decarbonize the energy sector while we protect the natural and working lands that provide for the conservation of species and habitat as well as other important co-benefits such as carbon sequestration.

Respectfully submitted,



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