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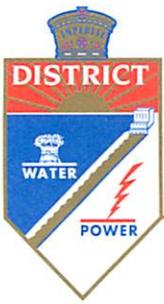
Comment Received From: Imperial Irrigation District

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Imperial Irrigation District Comments on Support of the RETI 2.0 Initiative

Additional submitted attachment is included below.



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November 16, 2015

Mr. Robert B. Weisenmiller, Ph.D.
Chair
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

Subject: 15-RETI-02 (Renewable Energy Transmission Initiative)

Dear Chair Weisenmiller:

Imperial Irrigation District appreciates the opportunity to provide input during the public comment periods afforded at both the September 10, 2015 joint agency workshop and the November 2, 2015 meeting to discuss the organizational structure and work plan. IID provides these comments in support of the RETI 2.0 initiative and in an effort to ensure that the end result benefits the whole of California.

1. IID agrees with comments made regarding the importance of input from the publicly owned utilities. IID looks forward to providing input into the process.
2. IID recognizes that there is a desire to consider transmission needs from a regional perspective but if the goal is to support California's Renewable Portfolio Standard Requirement of 50 percent by 2030, the focus should be on serving California's needs. A broader sensitivity analysis could be incorporated into the RETI 2.0 process that includes out-of-state requirements.
3. IID appreciates the high level overview of the RETI 2.0 process in terms of the proposed organizational structure but believes more detailed information regarding the scope of each group, deliverables and schedule is needed.
4. IID generally supports the leveraging of existing processes where possible. However, if only existing processes are to be used, suggestions for improvement by stakeholders should be considered for potential adoption and implementation.
5. IID supports the Commission's desire for an open and transparent process and looks forward to robust participation from all stakeholder groups. IID intends to dedicate resources to the endeavor and in that regard, and will participate in both the Land Use and Environment and Transmission Committees.
6. IID understands that challenges in project siting and permitting are numerous but cannot support potential dilution of the CEQA process. Further, if facilities are considered outside of California to facilitate import of renewable generation to aid

the state, the full scope of potential impacts created by those proposed facilities must be identified and analyzed.

7. IID supports the appointment of a program manager so that the processes can be documented and critical path items monitored, as appropriate.
8. Finally, IID is concerned regarding the apparent inter-state nature of the RETI 2.0 process given the number of jurisdictional and permitting approvals required. It does not appear likely there is sufficient time to permit such facilities in a timeframe necessary to meet California's 50 percent requirements. A closer look at existing, available transmission and shovel-ready resources located in-state may provide an interim measure toward achieving RPS compliance obligations, and will result in cost savings to California ratepayers.

IID looks forward to active participation in the RETI 2.0 process and appreciates the opportunity to provide these additional comments.

Sincerely,



Vicken E. Kasarjian
Energy Manager
Imperial Irrigation District

VK/ja