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IID Comments re 11.23.2015 Workshop

Additional submitted attachment is included below.



December 1, 2015

Docket Unit California Energy Commission Dockets No. 15-RETI-02 1516 Ninth Street, MS-4 Sacramento, CA 95814-5512

ATTN: Al Alvaredo

Re: RETI 2.0 Workshop of November 23, 2015; Comments

Dear Mr. Alvaredo:

On behalf of the Imperial Irrigation District (IID), the following comments are submitted in response to the Land Use and Environmental Committee workshop held on November 23, 2015.

IID acknowledges and appreciates the continuing efforts to maintain an open and transparent proceeding. The issues presented are important and deserve to be addressed with the highest degree of credibility.

As we proceed through the committee process, we must urge an attempt to clarify some important procedural matters to include:

- 1. The ultimate deliverable product out of both the Land Use & Environment Technical Input Group and the Transmission Technical Input Group as well as the Plenary Group;
 - 2. The decision-making process to be utilized within the groups; and
 - 3. The role of the Management Team (CEC, CPUC, CAISO).

In addition, in recognition of the intent to rely, in part, on the recently published Desert Renewable Energy Conservation Plan (DRECP), IID urges the exercise of caution in regards to the utilization of such given that the DRECP is only partially complete. The published portion of the DRECP creates a land use plan for government-owned lands but leaves an analysis of private lands to a secondary phase which has not as yet been initiated. The DRECP Amended Land Use Plan (ALUP) is thus an incomplete document.

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IID suggests that until such time as the document is deemed complete, its use should be limited.

IID again thanks you for your efforts and looks forward to continued participation.

Very truly yours,

ROBERT A. LAURIE

Assistant General Counsel, Energy