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Comment Received From: Daniel Kim

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## WSP comments to RETI 2.0 plenary group meeting on March 16, 2016 on renewable resource areas

Additional submitted attachment is included below.

Submitted online on March 29, 2016

RE: WSP comments to docket #15-RETI-02 on Renewable Resource Areas Workshop held on March 16, 2016

The Westlands Solar Park (WSP) appreciated the opportunity to participate in the RETI 2.0 plenary group meeting on renewable resource areas on March 16, 2016. The WSP participated on the developer and advocate panel to share our thoughts on the value of the San Joaquin valley for development of renewable generation.

The WSP believes that the San Joaquin valley is one of the highest quality solar resource areas yet to be developed in the western United States due to the preexisting impairment of thousands of acres of farmland that environmental and agricultural groups support for converting to solar generation. The Westlands Water District, the largest water district in the country, has over 100,000 acres of land that it has already retired as a result of drainage impairment and hundreds of thousands of acres of additional land that it will need to retire to due declining soil productivity from the lack of drainage and uncertain surface water supplies.

Large scale solar developing is already happening in the San Joaquin valley as evidenced by the attached map that shows up to 6,500 MW's of planned and developed solar just in Westlands Water District (WWD) alone. The amount of solar planned and developed in the WWD, if all built out, would make this one of the largest renewable resource areas in the west. Regardless of the challenges with how much the grid can absorb from solar generation the opportunities should not be ignored to think outside the box by repurposing the Helms pump storage facility and the federal, state and local water systems to store and utilize cheap on peak solar generation. We agree that RETI 2.0 should be analyzing the resource opportunities across the west and not just in California but we also believe that it is important for RETI 2.0 to distinguish between what are short and medium term least regret development opportunities in California versus what are longer term opportunities in the western grid region. We believe that California's greenhouse gas reduction goals will push renewable development beyond 50 percent by 2030 and combined with a future federal Clean Power Plan and other state's in the west increasing their own RPS goals the need for renewables in the west will be much larger than forecasted. Given the anticipated future growth of renewables in the west we believe that it is prudent for California to continue to pave the way forward for developing the least regrets resource areas, like in the San Joaquin valley, that are in state first while continue to plan for resources in the western grid to meet longer term objectives.

