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LSA Comments on Longer-term solutions to Aliso Canyon

Attached please find comments of the Large-scale Solar Association regarding the Aliso Canyon Action Plan.

Additional submitted attachment is included below.



April 22, 2016

Karen Douglas
Lead Commissioner
California Energy Commission
Dockets Office, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

Submitted electronically to Docket 16-IEPR-02 – Natural Gas

Dear Commissioner Douglas:

Thank you for the opportunity to comment on the Aliso Canyon Action Plan to Preserve Gas and Electric Reliability for the Los Angeles Basin. The state agencies have identified many important near-term actions to reduce natural gas and electricity use through demand-side initiatives in order to respond to this reliability challenge.

LSA suggests that the expedited deployment of utility-scale solar, particularly when co-located with storage, can provide a longer-term solution to add capacity and build energy resilience in the LA basin. Increased solar and storage deployment can reduce demand for gas-fired electricity generation and help mitigate the longer-term reliability challenges in the LA Basin should they continue through the winter and into 2017.

In particular, LSA recommends that the state agencies coordinate with Los Angeles County to revise the recently developed Renewable Energy Ordinance (REO) to open the door to additional deployment of utility-scale renewables. In 2013, Los Angeles County received grant funding from the CEC to develop its REO. The LA County Board of Supervisors unanimously indicated intent to approved the REO during the summer of 2015, yet it has not yet been formally adopted. One requirement of the REO is to fully underground all onsite and offsite transmission lines for utility-scale PV. Such a requirement is cost-prohibitive for development of large-scale solar projects, and threatens the likelihood of future development of solar with storage, which could otherwise provide future capacity and local reliability in LA County.

In addition, LSA understands that nearly 400 MWac of utility-scale solar is pending in the CAISO queue for LA County. While not all of these projects may be under active development at this time, LSA suggests that the joint agencies work to identify which of these projects could help support local reliability, and work with the County to expedite development of these projects.

Development and deployment of large-scale solar and storage in parts of Los Angeles County could enhance resilience in the LA Basin, public air quality and economic benefits, and help the state meet its renewable energy goals. Revising the County's land use policies now could allow enough time for project development timelines to run their course, and for the industry to provide a robust response to the policy interventions this group may implement with an eye towards 2017 and improved resilience for future reliability challenges in the LA Basin.

Sincerely,



Danielle Osborn Mills
Senior Policy Advisor
Large-scale Solar Association