Comments of the Natural Resources Defense Council (NRDC) on the "Transmission Planning Process/Strategies Refinement and Corridor Information Development"

DOCKET
09-IEP-1D
DATE June 24 2009
RECD. June 24 2009

Docket Number 09-IEP-1D "2009 IEPR Transmission"

June 24, 2009

Submitted by:

Helen O'Shea, Johanna Wald

Introduction

The Natural Resources Defense Council (NRDC) appreciates the opportunity to offer these comments on the **Joint IEPR & Siting Committee Workshop on Transmission Planning Process/Strategies Refinement and Corridor Information** conducted on June 15, 2009 as part of the development of the *2009 Strategic Transmission Investment Plan (STIP).*

NRDC is a nonprofit, environmental organization with 1.2 million members, 250,000 of whom live in California. NRDC and our members care deeply about the nation's wilderness, wildlife, and other natural resources, and are also deeply concerned about the threat that global warming poses to those resources. We believe that while energy efficiency, conservation and distributed generation will help move us towards a sustainable energy future, California will also need some level of utility scale renewable energy generation and transmission to meet its 33% RPS by 2020.

NRDC is actively working with other environmental organizations, public agencies and renewable energy developers to help California meet its renewable goals in an environmentally responsible manner. We strongly believe that by steering renewable development and transmission to areas with low resource conflicts, we can expedite the permitting process, and new, clean energy can be brought online within the timeframe necessary to help California meets its RPS and mitigate the effects of climate change.

Our comments address the following topics: results of the Renewable Energy Transmission Initiative Phase IIA Report; the development of a coordinated, statewide transmission planning process; expanding opportunities for stakeholder participation in transmission planning; and minimizing environmental impacts of transmission.

Renewable Energy Transmission Initiative (RETI) Phase IIA Results

The stakeholder-driven, consensus-based RETI process is a critical first step towards a new, more inclusive model for transmission planning in California. We support the California Energy Commission (CEC) incorporating and leveraging the work that has been accomplished by RETI in the *2009 STIP*. We strongly encourage the CEC to implement the following specific recommendations generated by RETI:

- Develop joint IOU-POU projects to avoid duplicative facilities and remove barriers to use: coordinating planning between private and public utilities will reduce construction of redundant facilities thereby minimizing overall environmental impact.
- Designate corridors: corridor designation can be an effective means of consolidating transmission facilities and directing them to areas of least conflict. Rigorous CEQA analysis of potential corridors will help determine the least environmentally harmful routes for accessing renewable resources.

In addition, we strongly encourage the CEC to adopt the guidance provided in the "Stakeholder Steering Committee Guidance for RETI Phase 2" issued December 17, 2008 which seeks to reduce environmental impacts by utilizing existing transmission corridors to the extent practical and minimizing rights of way requirements when new transmission corridors are necessary.

NRDC staff member Johanna Wald sits on the RETI Stakeholder Steering Committee and co-chairs the Environmental Working Group. NRDC was an active participant in the development of the corridor designation methodology that was presented by CEC staff at the June 15 workshop and strongly supports the use of corridor designation as a strategy for consolidating transmission facilities and directing them towards areas of least conflict. Just as corridor designations on federal lands must go through the NEPA process, corridor designations on non-federal lands must go

through CEQA analysis to determine the potential environmental impacts for each proposed corridor and to provide a sound basis for decision-making.

Coordinated, Statewide Transmission Planning Process

We commend the CEC for exploring the possibility of coordinated, statewide transmission planning. NRDC strongly believes that California must plan for an integrated energy *system* that is aligned with our clean energy goals rather than for a series of individual generation and transmission projects. Traditionally, planning for generation and transmission has occurred separately, which can lead to significant challenges in bringing location constrained renewable resources to load centers across long distances and environmentally sensitive lands.

Creating a *system* of integrated transmission and generation facilities will require exactly the kind of coordination among utilities that was the topic of panel discussion at the June 15 workshop. NRDC strongly supports efforts to coordinate the planning activities of public and private utilities as this will reduce the construction of redundant lines and therefore reduce overall environmental impacts.

Stakeholder Participation

Collaborative efforts like the RETI process have begun to engage public stakeholders in transmission planning on an unprecedented level. This is a very important and welcome step towards a new model for transmission planning, but additional steps must be taken to make opportunities for stakeholder participation truly meaningful.

Transmission planning is an extremely technical field requiring specific expertise. It is very challenging for stakeholders without the relevant technical background to engage in existing transmission planning forums such as the California Independent Systems Operator and the California Energy Commission. NRDC believes it is critical to have a framework that allows meaningful involvement for members of the public who are not well-versed in the technical details of transmission planning. This framework could support strategies such as corridor designation and conceptual planning which are activities that non-engineers can understand and contribute to based on their relevant knowledge of local resources.

The "Strawman Coordinated Statewide Transmission Planning Process" diagram presented by CEC staff at the June 15 workshop provides a helpful overview of how transmission planning might work going forward, but does not identify where opportunities exist for stakeholder engagement. CEC staff provided additional detail on this topic at the workshop, and it would be extremely helpful to have this additional detail incorporated into the diagram.

Minimizing Environmental Impacts

Promoting energy efficiency, conservation and distributed generation are essential strategies to building a balanced energy policy in California. Before building new transmission facilities, we need to make every effort to expand these alternative resources and to better utilize existing transmission infrastructure. Maximizing these alternative strategies also provides assurances to stakeholders that the new facilities being built are not in excess of what is actually needed – i.e. that we are not overbuilding. Most importantly, reducing overall demand can reduce the need to build new generation and transmission facilities which in turn reduces environmental impacts.

Another critical step in minimizing environmental impacts is incorporating environmental concerns early in the planning process. Historically transmission planning has incorporated environmental considerations at the end of the process, if at all, which in turn has often resulted in lines sited in highly controversial areas and vigorous opposition by stakeholders and local communities. As we build California's renewable energy future, environmental concerns must have a place in transmission planning from the very beginning of the process when avoidance and mitigation can be most effectively addressed.

When environmental concerns are addressed towards the end of the planning process there can be significant challenges. Many of our best renewable resources are located in areas far removed from the population centers that will use the energy. This scenario requires moving the energy over long distances that often encompass sensitive lands such as national and state parks, wildlife refuges, and other important natural areas. The most recent example of this is the Sunrise Powerlink transmission line. The original routing proposed for this line bisected Anza Borrego Desert State Park –

California's largest state park. After extensive controversy and an extended permitting process, an alternative route that does not cross state park lands was approved by the Public Utilities Commission in December 2008. There is absolutely no question that consideration of environmental concerns at the front end of this project would have resulted in a more appropriate routing.

In an effort to be proactive in identifying environmental concerns, NRDC and our colleagues in the environmental community have developed criteria for siting renewable projects in an environmentally responsible manner. The criteria were designed to expedite progress by avoiding conflict. The siting criteria will shortly be made publicly available and formally shared with state and federal government agencies.

This strategy - siting in least conflict areas - also applies to expediting transmission planning. The very preliminary environmental screens applied through the RETI process comprise the first step towards siting transmission facilities in least conflict areas, but are not a substitute for the detailed environmental review that is required by both CEQA and NEPA.

As noted previously the "Strawman Coordinated Statewide Transmission Planning Process" diagram presented by CEC staff at the June 15 workshop provides a helpful overview of how transmission planning might work going forward, however it does not identify where in the process environmental review will take place. It would be extremely helpful to have environmental review explicitly incorporated into the diagram.

Conclusion

In conclusion, NRDC welcomes the opportunity to work with the CEC and members of the renewable energy industry to build a new model for transmission planning in California that will help the state meet its RPS goals, identifies environmental concerns in advance, and provides meaningful and frequent opportunities for stakeholder engagement.

Thank you for the opportunity to comment on this important matter.

Respectfully submitted,

Helen O'Shea
Policy Associate

Johanna Wald
Senior Attorney