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California Energy Commission
Dockets Unit, MS-4
Re: Docket No. 09-IEP-1D
1516 Ninth Street
Sacramento, CA 95814-5512

RE: Docket No. 09-IEP-1D /Comments of the California Farm Bureau
Federation Regarding Strategic Transmission Investment Plan

Dear Commissioners:

The California Farm Bureau Federation ("Farm Bureau") appreciates the opportunity to comment on the September 2009 Draft Report on the Strategic Transmission Investment Plan ("Plan"). Perhaps the most important role the Plan plays in California's transmission planning process is the Plan's recognition of the need to approach planning with an overarching review of the state's needs and avoid the piecemeal planning that can occur. Farm Bureau has a long standing interest in the development of transmission and its implications for agricultural resources in the state, recognizing the importance of infrastructure improvements while also advocating for careful planning to minimize impacts. As a result, comments here will center on the importance of coordination of planning efforts, the need for early engagement of stakeholders in the planning efforts, the importance of a robust review of the need for any projects and implications of early acquisition of land for transmission purposes.

The issues addressed in Chapter 4 of the Plan – Challenges to Achieving a Coordinated Statewide Transmission Plan – encompass much of Farm Bureau's focus in this area. Of significant concern is the importance of better coordination and cooperation among all transmission planning entities and owners to address transmission needs. As noted on page 62, the recent collaboration of the California Transmission Planning Group appears to be addressing the goal of coordination. However, it is quite a new process and it remains unclear what the results of the group's efforts might be or how effectively stakeholder input will be utilized. An important outcome of the CTPG would be coordination among Investor Owned Utilities and Publicly Owned Utilities such that optimum utilization of any new transmission infrastructure is achieved. Because of current planning, funding, approval and operating methods, utilities have not seemed inclined to undertake joint projects. In many instances projects that could serve both IOU's and POU's needs would minimize rate impacts as well as effects on state resources.

Stakeholder engagement is very important, particularly to landowners who may be impacted by construction of lines on their property. The importance of addressing stakeholders in the planning process is manifested in a number of ways, but particularly so with respect to the need of the project and routing implications. With respect to need, it is essential that the need of the project and its purposes are explained and justified in a manner that evokes acknowledgement of the overlying importance of the project in relation to the state's infrastructure. Without transparent details and planning rigor in the process, stakeholder support will be difficult to achieve no matter how much effort is placed into the routing discussions. With regard to the need for the project, POUs may be faced with increased questions about the rigor of the analysis because fewer steps and oversight are currently required for approval of their projects, since ISO and CPUC processes are not invoked.

With respect to routing issues, no matter what process is used to engage stakeholder input, transparency and a genuine willingness to revise projects based on the input must be integral to the process. Too often project proponents go through the motions of stakeholder notification and meetings, without meaningful engagement resulting in ever-increasing frustration by the communities affected. Not only is contentiousness increased in approval processes when proponents do not meaningfully engage the public, but there may be subsequent affects as well even if the project is approved. The communities affected by any project will be much more likely to work through post-approval issues when the proponent has consistently made legitimate efforts to respond to the concerns of the stakeholders prior to the approval process.

Finally, Farm Bureau would like to address the issue of cost recovery for land investment within designated transmission corridors, which is raised at page 83 of the Plan. The discussion identifies the need for utilities to invest in land which might appropriately be preserved for transmission designation. Because a corridor in this context would be a planning tool and not a specific project, it is assumed such land acquisition would not be subject to eminent domain. Although Farm Bureau appreciates the potential to acquire land for projects through a willing buyer and seller scenario, rather than resorting to eminent domain, there may be unintended consequences. Consideration should be given to the manner in which the utilities might acquire the necessary property, whether through easement or fee acquisition. Because more and more routes for lines are identified on agricultural properties, the long-term consequence to adjacent properties of such an approach needs to be considered. In addition if a change to the corridor or its abandonment occurs, it would be appropriate to require an offer to return the acquired interest to the affected landowner. If recovery by a utility of long-term costs for land assets is expanded, rate impacts and land use impacts should be minimized.

The California Farm Bureau Federation appreciates your consideration of its comments.

Very truly yours,

/s/

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