

**Comments of the Center for Energy Efficiency and Renewable Technologies in Response  
to the Committee Workshop on Transmission Needed to  
Meet State Renewable Policy Mandates and Goals**

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### **Introduction**

The Center for Energy Efficiency and Renewable Technologies (CEERT) submits these comments to the California Energy Commission (CEC) in response to the Committee Workshop on Transmission Needed to Meet State Renewable Policy Mandates and Goals. CEERT appreciates this opportunity to expand on the comments made at the workshop by V. John White, our Executive Director.

### **Need for Proactive Transmission Decisions**

As several workshop participants pointed out, transmission decisions are increasingly driven by generator interconnection requests despite the expectation that few of the generation projects making the requests will be constructed in the near future. Processing the requests requires a large commitment of resources by the utilities and California Independent Systems Operator (CAISO) but has little or no value if the projects are not constructed.

Although interconnection processes are governed by federal rules over which the state has no control, CEERT believes that the backlog of requests could be reduced significantly and the interconnection process streamlined if the state were to make initial *proactive* decisions about transmission needed for access to renewable resource areas, rather than simply reacting to the scattershot of interconnection requests.

CEERT points out that many of the major transmission decisions in recent years have been made in advance of need demonstrated by interconnection requests. The rationale behind the Sunrise Powerlink, the Tehachapi Project, and the Colorado River-Devers-Valley project was to provide renewable access, even though commitments from generation developers to use the new facilities had not been made when the facilities were approved. CEERT recommends that California continue this proactive approach to transmission planning.

The best renewable resource areas are well known and have been characterized in the RETI process. The Bureau of Land Management (BLM) Solar Programmatic Environmental Impact Statement (PEIS) and the Desert Renewable Energy Conservation Plan (DRECP) processes provide further information about where renewable development is most beneficial. There is little

doubt that the state's increasing long-term reliance on renewable energy resources will require expanded transmission access to the world class resources in Southern California (e.g. in the West Mojave area, Eastern Riverside County and Imperial Counties) and expanded ability to move this energy to load centers in the Los Angeles and Bay Areas.

CEERT would like to emphasize the benefits of transparent collaborative discussions identifying the most likely transmission enhancements needed to satisfy the State's long term policy goals. These discussions should be informed by existing interconnection requests and generation project permitting activity. They should not be limited to a reactive role but should exercise its collective judgment on developing transmission access to resource areas most beneficial to the State's interests.

### **Need for Improved Interagency Coordination**

As John White pointed out at the workshop, the multiplicity of venues in which transmission decisions are made unnecessarily delays final decisions and limits informed involvement by a broad range of stakeholders. The CEC could enhance public participation by hosting an en banc where appointed leaders from the CEC, California Public Utilities Commission (CPUC) and CAISO, as well as other relevant energy agencies, could address and reconcile differences in a public setting and take public testimony on possible solutions.

In recent years the planning process has been improved by the creation of the Renewable Energy Action Team (REAT), the MOU between the CPUC and the CAISO, and other interactive activities. CEERT's proposed interagency/stakeholder planning process would expand participation to *all* relevant entities statewide under a single umbrella and have authority to reach joint binding decisions on common issues.

### **Conclusion**

CEERT believes that the above recommendations address the three most important issues facing transmission planning today: how to "get ahead of the curve" and return to proactive transmission planning; how to meaningfully involve a broad range of stakeholders in development of consensus decisions; and how to resolve differences between existing multiple venues.

CEERT hopes that its recommendations will be explored further in the 2011 IEPR process and presented as a blueprint for a streamlined statewide process in the final document.