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Desert Renewable Energy Conservation Plan
Dockets Office, MS-4
Docket No. 09-RENEW EO-01
1516 Ninth Street
Sacramento, CA 95814-5512

Attention: David Harlow
Director
Desert Renewable Energy Conservation Plan

Subject: Southern California Edison Company comments on the Preliminary Conservation Strategy for the Desert Renewable Energy Conservation Plan

To the Desert Renewable Energy Conservation Plan Team:

Southern California Edison (SCE) is pleased to provide comments on the Preliminary Conservation Strategy (PCS) of the Desert Renewable Energy Conservation Plan (DRECP), released by the California Energy Commission (CEC) on October 26, 2011.

SCE provides these comments as constructive recommendations for improvements on specific issues of importance to our utility operations consistent with our obligation to plan, permit, construct, own and operate transmission infrastructure to meet renewable energy and reliability needs in a safe, reliable, and cost-effective manner.

SCE believes that the DRECP will, when complete, provide the regulatory framework necessary to support investment in renewable energy resources and associated electrical transmission facilities, while ensuring effective protection and conservation of the state's native wildlife and plant species and the natural communities that support them. SCE's experience operating under HCP/MSHCP/NCCP models has yielded significant benefits, including reducing the amount of time to secure necessary "take" permits (from years to months), providing cost certainty (pre-determined mitigation fee schedule), and reducing the risk of litigation (plan consistency versus individual projects).

California's renewable energy and climate change goals are among the most ambitious in the nation. In support of these goals, SCE procures more energy from renewable resources than any other utility in the country. Despite aggressive renewable energy procurement, challenges to meeting the state's renewable energy goals remain. These challenges include permitting and siting renewable energy projects and related transmission facilities, two areas that the DRECP seeks to address. SCE supports efforts to streamline the approval of renewable energy generation projects, and the necessary transmission system infrastructure to support such generation, to facilitate environmentally responsible utility-scale renewable development in a timely fashion.

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Transmission upgrades and additions will be needed to safely and reliably interconnect renewable energy resources from remote areas of the state to population centers. State and regional transmission planning efforts have identified transmission upgrades and additions needed to meet today's renewable energy goals, based upon best available information. Uncertainty remains, however, as to the location, amount, and type of renewable energy resources that will be developed today, and in the future.

Integration of land-use and transmission planning efforts, informed by the DRECP, will provide greater certainty, resulting in a more orderly, rational, timely, and cost-effective state and regional transmission planning and permitting process. Coordination of state and regional planning efforts of the California Independent System Operator (CAISO), California Public Utilities Commission (CPUC), the California Energy Commission (CEC), and the Western Electricity Coordinating Council (WECC), including broad stakeholder participation, are essential to achieving the state's goals.

Facilitate Cost-Effective, Environmentally Sound Transmission Planning, Siting, and Permitting: The DRECP should facilitate cost-effective, environmentally sound transmission planning, siting, and permitting. The DRECP should recognize the need for sufficient transmission system upgrades and additions to integrate renewable energy resources. Moreover, the DRECP should acknowledge the need to designate additional transmission corridors or expand existing corridors in coordination with regional planning efforts by WECC and others, and should take into consideration the cumulative impact to the electrical grid of multiple downstream transmission infrastructure changes to accommodate new renewable generation projects. The DRECP should recognize the need for utilities to acquire sufficient lands to support transmission corridors, upgrades and additions, and to hold such lands for future use consistent with the DRECP planning horizon.

Specifically, DRECP should:

- Provide flexibility in the Reserve Design to facilitate the siting and permitting of transmission corridors, upgrades and additions in a cost-effective, environmentally sound manner.
- Identify transmission system upgrades and additions, including collector substations, network upgrades, downstream upgrades, corridors, and related infrastructure (such as roads and telecommunication), sufficient to support the delivery of electricity from renewable energy development in the RESAs and to maintain a reliable and safe electrical system.

  Proximity to existing transmission lines does not guarantee availability. It is important to note that transmission lines located in proximity to Renewable Energy Study Areas (RESAs) may not necessarily have sufficient capacity to accommodate the anticipated renewable generation in RESAs.
- Encourage the use of existing roads, transmission rights-of-way, and corridors, wherever feasible, consistent with all applicable reliability planning criteria required by the North American Electricity Reliability Corporation (NERC), Western Electricity Coordinating Council (WECC), and the California Independent System Operator (CAISO).

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- Analyze transmission upgrades, additions, new or expanded corridors, and related infrastructure in sufficient detail so as to facilitate timely permitting by local, state, and federal entities.

  DRECP should pay particular attention to the need for the designation of seamless, contiguous transmission corridors that would facilitate transmission upgrades and additions needed to support renewable energy development in RESAs, the import and export of renewable energy resources, and the development of interstate interties, in a cost-effective, safe and reliable manner. DRECP should also support the CEC's designation of transmission corridors that include sufficient right of way to support such transmission upgrades and additions.

- Coordinate with the CAISO's Transmission Planning Process (TPP) to ensure that transmission upgrades and additions needed to support renewable energy development in areas identified by DRECP are considered for inclusion as "policy driven projects".

- Coordinate with the WECC regional transmission planning efforts to ensure consistency and compatibility across the western region of North America. Coordination of state and regional planning efforts could lead to a fully integrated west-wide transmission system, taking advantage of generating characteristics of both variable and flexible generation to lower costs, increase reliability, and to facilitate "system balancing" across broad geographic regions to "smooth out" the variability of renewable energy resources.

  DRECP should pay particular attention to transmission corridors, upgrades and additions that may be needed to safely and reliably integrate renewable energy resources, both imported and exported, in to the electrical grid consistent with the DRECP planning horizon.

- Coordinate with long term, comprehensive energy and environmental planning efforts, including the CPUC Long Term Procurement Plan (LTPP) and the BLM Solar PEIS to direct development to high renewable resource value, low conflict areas.

Thank you for the opportunity to provide comments and suggestions to the DRECP. Please find attached specific comments keyed to the PCS by chapter, section, and page. SCE looks forward to working with you to ensure that the DRECP facilitates cost-effective, environmentally sound transmission planning, siting, and permitting.

Sincerely,

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Desert Renewable Energy Conservation Plan

DRECP Preliminary Conservation Strategy

Comment Form

Dockets Office, MS-4

Docket No. 09-RENEW EO-01

Comments submitted by: Southern California Edison
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Commenter (Your Name)	Comment #	*Comment Location:* Chapter	Section #	Page #	Paragraph	Paragraph (from top)	Comment (e.g., organization, content, grammatical comments)
Southern California Edison	SCE-01	2	2.1	2-15			Figure 2-2F: The majority of the map shows areas of moderate-high biological value with low biological value areas as islands surrounded by the moderate-high value areas. Further refinement of the biological value maps with greater distinction of the level of biological sensitivity will facilitate siting of transmission projects within less sensitive areas. Transmission need to have greater flexibility in siting due to the need to connect development areas to the grid and load centers.
Southern California Edison	SCE-02	2	2.1	2-17			Bullet #4 - It is difficult to see core habitat detail in the biological resource maps (eg. Desert bighorn, tortoise). Transmission corridors need to avoid resources to the greatest extent; finer scale definition for species/habitat is needed in order to minimize impacts.

Southern California Edison	SCE-03	2	2.2	2-22	1		It will be useful for the plan to define how different types of conservation areas will be factored in for mitigation purposes. Different types of areas such as critical linkages, wildlife corridors, and areas in need of habitat enhancement, should be identified in the effort to create mitigation and conservation areas. Prioritizing or tiering of these categories may be a useful conservation tool.
Southern California Edison	SCE-04	2	2.1	2-6		5	2. Narrow range species - there is a significant lack of survey data for rare sensitive species in the plan area, little is known about many narrow range species, this makes conservation planning for these species problematic. Will additional studies be conducted for the DRECP or will survey requirements be incorporated into the DRECP mitigation measures.
Southern California Edison	SCE-05	2	2.1	2-6		6	3. Natural Communities and landscape/ecological processes - there is a significant lack of survey data for rare habitat types/processes in the plan area. Will additional studies be conducted for the DRECP or will survey requirements be incorporated into DRECP mitigation measures.
Southern California Edison	SCE-06	2	2.1	2-16		1	Areas described as low biological value may still contain areas with species and habitats appropriate for conservation, these areas should be considered for conservation along with the high to moderate value areas.
Southern California Edison	SCE-07	2	2.3	2-45		3	Reserve design: the plan potentially incorporates hard-line and soft-line conservation areas for renewable energy development, however, electric transmission lines require a greater degree of flexibility in siting than generation facilities due to the potential need to cross biologically sensitive areas to reach the generation.
Southern California Edison	SCE-08	4	4	4-22			Cultural resources issues were not analyzed or addressed in the PCS. However, sensitive cultural resources have the potential to have a significant impact on the siting of projects. How will the DRECP address cultural resources as part of the planning process?

Southern California Edison	SCE-09	4	4.3	21-22	2		Section 4.3, on the bottom on p. 21, states that it is reasonable to assume that transmission would be available or could be made available to the identified potential RESAs. For the five RESAs located in the SCE service territory (Barstow, Blythe, Owens Valley, and West Mojave), significant transmission upgrades including and in addition to what is identified in figure 4-6 (DRECP Preliminary Conservation Strategy Map) may be needed to interconnect future generation from the RESAs due to existing and future transmission constraints.
Southern California Edison	SCE-10	4	4.1.2	7	1		Proximity to transmission (existing or planned high-voltage lines and substations) is identified as a desirable characteristic. While proximity to existing and future transmission can be a desirable characteristic, many existing transmission and distribution lines and substations within the SCE system do not have the necessary capacity to accept additional power. Existing lines and substations may need to be upgraded, new lines and substations may be needed, existing corridors may need to be expanded, and new corridors may be needed to account for the localized and downstream impacts of future generation projects. In addition, gen-tie congestion from multiple individual generation projects to utility facilities and required ancillary equipment (i.e., battery storage systems, shunt capacitors, series capacitors, static var compensators, etc.) need to be accounted for. Required ancillary equipment could cause the need for new facilities or the expansion of existing facilities.
Southern California Edison	SCE-11	4	4.1.3	14	1		In the 4.1.3 Transmission Planning section, it is stated that further analysis is currently underway to understand constraints at lower voltages. SCE has received many generation interconnection requests on voltages 115 kV and lower and many of these facilities will need upgrades to accept power from future generation projects.
Southern California Edison	SCE-12	App A-2	A.2	A2-1			Wildlife movement corridors and linkages - transmission corridors and rights-of-way do not necessarily block wildlife movement and in many areas facilitates movement through developed or partially developed areas. Transmission corridors should be taken in to consideration as a component of wildlife movement corridors and linkages.

Southern California Edison	SCE-13	7		2			In Section 7, p.2, bullet C states the Renewable Energy Study Areas (RESAs) will be reviewed and refined. Question: Can Google Earth KMZ files of the current and future refined RESAs be made available to DRECP stakeholders?

How to Submit Written Comments

Please submit comments on the DRECP Preliminary Conservation Strategy by **November 23, 2011**.

Please include the docket number "09-RENEW EO-01" in the subject line or first paragraph of your comments.

Those submitting comments electronically should provide them in either Microsoft Word format or as a Portable Document Format (PDF) and send them via email to [**docket@energy.state.ca.us**]. Please include your name or organization's name in the file name.

Those submitting comments in paper format, please send them to:

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