

# DOCKET

09-RENEW EO-1

DATE MAY 09 2012

RECD. MAY 09 2012

May 9, 2012

California Energy Commission  
Dockets Office, MS-4  
Docket No. 09-RENEW EO-01  
Sacramento, CA 95814-5512

Ladies and Gentleman:

Clean Line Energy Partners LLC appreciates the opportunity to submit comments on the materials and topics discussed at the Desert Renewable Energy Conservation Plan (DRECP) stakeholder meeting held April 25-26, 2012. These comments address the process undertaken by the DRECP to incorporate transmission lines into the overall DRECP Environmental Impact Report/Environmental Impact Statement (EIR/EIS) and Native Communities Conservation Plan/Habitat Conservation Plan (NCCP/HCP).

### Consider all Future Transmission

At the stakeholder meeting, representatives from the Transmission Technical Working Group (TTWG) presented a plan for new transmission facilities that are needed in 2040 to interconnect approximately 21,000 MWs of renewable generation located in the DRECP footprint. However, the plan also should consider new transmission lines that will cross the footprint to interconnect generation outside the DRECP footprint directly with load. Incorporating these lines into the overall transmission line acreage estimate will reflect future transmission development in the DRECP area more accurately.

### Maintain Flexibility

The plan developed by the TTWG drew new lines and substations on a map of the DRECP footprint. Members of the TTWG made clear that these "lines on a map" did not necessarily represent the location of future facilities, but would be used to provide an estimate of the total acreage in the DRECP footprint used by new transmission development. It is important that the DRECP not use this acreage estimate to designate specific transmission corridors. Transmission development should instead be determined by the evolving needs of the power grid. Efforts by the DRECP to assess the impact of transmission are valuable, but should avoid relying too heavily on assumptions that are likely to change. For example, the transmission plan presented by the TTWG at the stakeholder meeting assumed the output of renewable generation in the DRECP area would be delivered equally to Southern California, Northern California, the Pacific Northwest and the Desert Southwest in 2040. If the Pacific Northwest and Desert Southwest continue to develop their own substantial renewable resources in the next 30 years, the destination of energy from DRECP area generators could change, and in turn, transmission line configurations would change. Any assessment of transmission impacts in the EIR/EIS and NCCP/HCP(s) therefore should be flexible enough to accommodate these changes.

Furthermore, the plan used by the DRECP should reflect, as closely as possible, transmission planning processes conducted by the CAISO, the Western Electricity Coordinating Council (WECC), the California Transmission Planning Group and WestConnect. Lastly, future transmission projects in the DRECP footprint will likely require their own EIR/EIS. The DRECP EIR/EIS and NCCP/HCP should not constrain the ability of such project-specific environmental reviews to make their required determinations. If conflicts between the DRECP documents and project specific EIR/EIS documents exist, any process for reconciling the two should be simple and expedient.

Respectfully submitted,



Jayshree Desai, Executive Vice President  
Clean Line Energy Partners LLC