WESTLANDS SOLAR PARK

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TO: California Energy Commission
FR: Westlands Solar Park

RE: Comments to the May 10, 2012 Lead Commissioner Workshop on Identifying and Prioritizing Geographic Areas for Renewable Development in California – Docket Number 12-IEP-1D

The Westlands Solar Park is pleased to submit these comments to the May 10, 2012 Lead Commissioner workshop on identifying and prioritizing geographic areas for renewable development in California. The Westlands Solar Park (WSP) is a 30,000-acre (5,000 MW) RETI identified renewable energy zone in the southern part of the Westlands Water District. The WSP is California's only public-private renewable energy solar park that is universally supported by the environmental and agricultural stakeholders due to it being located entirely on drainage-impaired farmland and sited underneath existing transmission corridors that can deliver renewable power to northern or southern parts of the state.

Why Solar Development in the WSP is a Win-Win for CA

The development of solar generation in the WSP is a win-win for California due to the nexus of federal and state environmental priorities to retire these drainage-impaired lands in the Westlands Water District that have elevated concentrations of salt and selenium. Also, the location of the WSP meets the state's goal to see large-scale solar generation sited near existing transmission corridors consistent with the Garamendi principals. Lastly, the siting of WSP near major load in central and northern California makes generation from this location ideal for utilities concerned about the costs and permitting challenges of new transmission to meet their RPS mandates.

Transmission and Generation Cost Benefits of Solar from WSP

The WSP provides short term renewable energy delivery opportunities at the least cost to ratepayers because there is already 800 MWs of capacity with minimal transmission upgrade costs that have already been approved by the CAISO in the 2010/2011 TPP.

Furthermore the "all in costs" of generation and transmission from the WSP shows significant cost advantages to siting large scale solar generation in this location compared to other areas in the state. The quantitative cost advantages of solar generation from WSP are a result of the existing transmission capacity and minimal network upgrade costs to interconnect 800 MWs of solar generation from this area. In fact in an "apple to apple" comparison of the "all in costs" of 800 MWs of solar generation from WSP compared to desert projects that have higher solar insolation the first 800 MWs of generation from WSP is still more cost effective due to the lower cost of transmission. Lastly the WSP is the only renewable energy zone near major load centers and this makes generation from this area more efficient due to the likelihood of lower line loss compared to other renewable energy generation that is sited in remote areas and requires 100-mile "gen-ties" to deliver power to load.

Environmental and Energy Benefits for Land Retirement in WSP

The 30,000 acres of farmland in the WSP is all drainage impaired with elevated levels of selenium and high saline soils that require intensive management in order to produce adequate crop yields for the farmers. Also, surface water deliveries to WSP farmers are subject to chronic and substantial shortfalls. This has necessitated increased groundwater pumping from the deep aquifer that exacerbates the already over drafted groundwater basin. Additionally, cumulative salt loading to the deep aquifer occurs as salts are flushed from the surface soils. In the long run, the continued groundwater mining and salt pollution of the deep aquifer will render it unusable as a source of supplemental irrigation water, with disastrous consequences for the agricultural economy of the San Joaquin Valley.

In recognition of the need to address the environmental impacts associated with continued farming on drainage impaired lands in Westlands, the federal government has recommended as one of the long term solutions to retire and convert these lands to solar energy production. The Westlands farmers want to see a solution to the diminishing allocation of water from the federal water project and the lack of completion of a drain to carry the selenium and salt off their lands that impact their ability to productively farm these lands in the long term. Conversion of these drainage-impaired lands in the WSP to solar energy production is an ideal solution to the water and energy needs of California as long as policymakers are able to work with the landowners in the WSP to create a procurement and transmission plan that will effectuate the long term development of solar in this area.