

## DOCKETED

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*Comment Received From: Rachel Gold*

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**LSA Comments on Aug 3rd IEPR Workshop**

*Additional submitted attachment is included below.*



August 17, 2015

Al Alvarado  
California Energy Commission  
Dockets Office, MS-4  
1516 Ninth Street  
Sacramento, CA 95819-5512

RE: 15-IEP-08 – Transmission and Landscape Planning

Dear Mr. Alvarado:

The Large-Scale Solar Association (“LSA”) is comprised of leading owners and developers of utility-scale solar projects. LSA appreciates the opportunity to provide comments on the California Energy Commission’s (“Energy Commission”) August 3rd Workshop on Landscape-Scale Environmental Evaluations for Energy Infrastructure Planning and the Strategic Transmission Investment Plan and offers the following comments:

LSA generally supports efforts to bring stakeholders together to identify areas of least-conflict for renewable development. Doing so early in the transmission or renewable energy siting process can facilitate the development path by both identifying low-conflict areas and by providing incentives for development in those areas. We are pleased to be participating in the San Joaquin Valley effort, which is, as we understand, designed to do both of these things. The experience to date with landscape-level planning for renewable development in California, however, has been uneven, resulting in vast renewable exclusion areas paired with uncertain and even inadequate areas for renewable energy. To note, LSA remains concerned about the outcome of the Desert Renewable Energy Conservation Plan (“DRECP”), with regard to how renewable development will be incentivized and generally planned for, whether it will integrate with county planning, and whether the DRECP will achieve its conservation and renewable energy objectives.

As we enter a new phase of planning for 50 percent and higher renewable energy targets, LSA recommends the state incorporate the following lessons learned from efforts to date:

- The scope of this effort should start with a sufficiently broad and long-term vision about the grid changes necessary to get achieve the state’s climate goals. LSA is interested in learning more about how the state’s new RETI 2.0 initiative will be designed to identify and initiate key next steps for energy infrastructure planning. We also recommend that this effort consider not only the least-cost, short-term transmission needs (e.g. an energy only scenario) to achieve at least 50% renewables, but also an assessment of the kinds of deliverability needed in the mid-longer term as we begin to utilize renewables and storage to meet essential reliability needs. In addition, LSA recommends the agencies work to address confusion posed by conflicting regulatory messaging. In the past, the California ISO identified a number of transmission projects as “needed” policy driven upgrades to accommodate renewables. However the California Public Utilities Commission (“CPUC”) identified the same projects as “not needed.”

Nothing stalls renewable energy development and infrastructure planning like unclear government directives. Thus, this phase of planning should start with a clear understanding of the past challenges and work to develop a more streamlined and predictable process moving forward.

- The agencies should continue to build on their current collaboration and coordination. We note that the role of the Energy Commission and CPUC in jointly developing land use screens for use by in the RPS Calculator at the CPUC remains unclear. The workshop presentation by the Energy Commission suggested that a new approach was already under development; while the CPUC's presentation indicated a scoping exercise will be undertaken later this year. LSA believes that the appropriate path is to begin with a joint scoping exercise. If however, the Energy Commission has already started to develop its approach, any scoping effort at the CPUC may not be fruitful as it will likely be too late to materially inform the methodology.
- The agencies should proceed cautiously with the adoption of new tools. The development of Data Basin as a mapping tool provides a useful resource for industry, regulators and all stakeholders, and LSA appreciates the efforts thus far to ensure quality and consistency of data and greater transparency. In order for these tools to be useful, however, the Commission will need to devote continued and ongoing resources to data management and ensuring the quality and accuracy of the uploaded data. In addition, while the tool is useful to inform landscape-level discussions, our past experience indicates that the data is not granular enough for specific siting decisions. Thus, it should not in any way be used to pre-judge either the environmental review process of projects or contract approvals at the CPUC.
- Until the DRECP is finalized, the state is susceptible to balkanized renewable energy siting and permitting practices at the county level in the California desert region, evidenced recently by far-reaching renewable energy decisions on the part of Imperial and Los Angeles Counties. While renewable energy development is supported at the state level, more work should be done by the state agencies with counties (some of whom are developing plans with state grant monies) to more effectively accommodate and encourage renewable energy and to understand and help to address individual county concerns. Absent that level of coordination, the unintended outcome of the DRECP could be the addition of new uncertainties regarding renewable energy siting in California. LSA suggests that during this interim period, counties continue to coordinate with one another and with state and federal agencies to prevent any policies adopted by the counties from conflicting with statewide goals for renewable energy. We also welcome opportunities to work with agencies and counties to address local government concerns about solar energy siting.

LSA appreciates the opportunity to provide these comments and looks forward to continuing to work with the Energy Commission, CPUC and the California ISO on these important issues.

Sincerely,



Rachel Gold  
Policy Director