



Dear CAISO Staff,

Pursuant to the CAISO 2017-2018 Transmission Planning Process meeting, held on September 21-22, 2017,¹ we respectfully submit the following comments.

Our comments focus on the Interregional Transmission Project (ITP) Evaluation and 50% RPS Out-of-State Portfolio Assessment, presented on Day 2.² This presentation summarized CAISO's review of potential transmission projects to deliver out of state wind resources to California for the 50% RPS.

We respectfully submit that high-level environmental policy review is needed before CAISO proceeds with further planning for out of state wind.

In July 2016, the CAISO SB350 study was released, analyzing potential impacts of grid regionalization. The environmental analysis in this study indicated that developing out of state wind resources would likely reduce avian impacts in California known important bird areas, but would greatly increase avian impacts in Wyoming and New Mexico important bird areas. See SB350 Study, Environmental Volume,³ Section 4.2.5 Biological Resources.

The proposed New Mexico and Wyoming wind resources and associated transmission projects should at least be reviewed again more closely with the latest WECC Environmental Data Viewer, last updated March 2016.⁴

Ideally these projects would be reviewed with the higher level of additional functionality and higher resolution available in the CEC Environmental Report Writer⁵ tool, but this tool needs to be finalized and publicly released, and inter-state jurisdiction issues need to be addressed.

It is important to note that the California environmental data tool has higher resolution and functionality than the WECC-wide environmental data viewer. The lower level of environmental information available outside of California may result in less well-informed decisions, and potential environmental damage due to information gaps.

The lower level of environmental protections for certain species outside of California should also be noted and addressed when considering these out of state renewable resources for California RPS eligibility.

¹ <http://www.caiso.com/planning/Pages/TransmissionPlanning/2017-2018TransmissionPlanningProcess.aspx>

² https://www.caiso.com/Documents/Day2_ISO-Presentation_2017-2018TransmissionPlanningProcess_PreliminaryReliabilityResults.pdf

³ <https://www.caiso.com/Documents/SB350Study-Volume9EnvironmentalStudy.pdf>

⁴ <https://www.arcgis.com/home/item.html?id=f2ccb1ca9d364ef7a78b245e15675a8d>

⁵ http://docketpublic.energy.ca.gov/PublicDocuments/17-MISC-03/TN220483_20170801T111642_Presentation_by_Scott_Flint_8217.pdf

Stakeholder coordination and collaboration, as well as the assembly of supporting geospatial information, are critical in developing meaningful transmission plans. Defenders applauds your leadership in the Transmission Planning Process, and we look forward to our continued work with the CAISO on this important effort.

Sincerely,
Emily Leslie
On Behalf of Defenders of Wildlife