



December 5, 2013

To: California Independent System Operator  
250 Outcropping Way  
Folsom, CA 95630  
Submitted via email to: [regionaltransmission@caiso.com](mailto:regionaltransmission@caiso.com)

Subject: Joint comments of The Nature Conservancy, Natural Resources Defense Council, Defenders of Wildlife, Sierra Club and The Wilderness Society on the California Independent System Operator's 2013-2014 Transmission Planning Process Stakeholder Meeting held on November 20-21, 2013.

## 1. Introduction

The Nature Conservancy, Natural Resources Defense Council, Defenders of Wildlife, Sierra Club and The Wilderness Society ("Joint Environmental Parties") appreciate the opportunity to submit comments in response to the California Independent System Operator's (CAISO) 2013-2014 Transmission Planning Process (TPP) Stakeholder Meeting held on November 20-21, 2013 (the "Stakeholder Meeting"). These comments are specific to the Desert Renewable Energy Conservation Plan (DRECP) and the preliminary results of the policy-driven transmission need assessment. In addition to this letter, the Sierra Club will submit individual comments on other aspects of the Stakeholder Meeting.

## 2. Transmission Planning for the Desert Renewable Energy Conservation Plan

### Background

Our comments are informed by our mutual interest in improving the integration and coordination of land-use, energy generation and transmission planning. The Joint Environmental Parties believe that the DRECP could facilitate responsible and sustainable renewable energy development to meet California's renewable energy mandates and needs efficiently and effectively while simultaneously providing lasting conservation for species, natural communities and ecological processes in the California deserts.

The Transmission Planning Process must address transmission upgrades and investments needed to support renewable energy development in the draft Development Focus Areas (DFAs) identified by the DRECP. While these areas are not yet final, the plan is expected to

be complete in 2014 and it is important that investments to the DFAs be planned for, and executed in a timely manner after plan completion. Transmission projects currently have a long lead-time, and access to transmission with available capacity within the DFAs is one of the major benefits, and a key development incentive for the DRECP. Consequently failing to plan for serving the zones could have significant impacts on the success of the entire planning effort. This is an area where enhanced coordination of CAISO with state and federal planners is needed.

### **Stakeholder Meeting**

At the Stakeholder Meeting it was noted by CAISO representatives that the CAISO is a participant in the Desert Renewable Energy Conservation Plan development process. It was also noted that the DRECP is utilized in the California Public Utilities Commission (CPUC) long term procurement plan proceeding where renewable generation portfolio scenarios are developed and provided to CAISO for use in the transmission planning process. The latter is consistent with the May 2010 Memorandum of Understanding between the CPUC and CAISO.

The recent Stakeholder Meeting focused on the preliminary results of the 33 percent Renewable Portfolio Standard policy-driven transmission need assessment. It is not clear to our organizations how the preliminary results presented at the meeting correlate to the DRECP and if the proposed projects will provide availability/capacity to the draft DFAs.

- **Recommendation:** The 2013-2014 Transmission Plan would be improved by including a section on the DRECP that clearly articulates current transmission availability in the draft Development Focus Areas of the DRECP, including which CAISO approved and proposed transmission projects correlate to these areas. It would be helpful if the target online dates for the CAISO approved and proposed transmission projects are included, so that stakeholders can understand the chronology of transmission availability/capacity within the DRECP plan area. Although the DFAs are currently in draft form, we note that there may be previously disturbed or degraded areas common to proposed DFA alternatives, and these could be used as a baseline for planning.
- **Recommendation:** As stated in the November 20, 2013 comment letter submitted by The Nature Conservancy, the Natural Resources Defense Council, Sierra Club and Defenders of Wildlife, the CAISO Conceptual Statewide Plan should address how the CAISO will study and analyze the DRECP DFAs when the draft DRECP is released in 2014. The Conceptual Plan should, at a minimum, describe and outline the process and timeline for study of the DFAs and incorporation into the 2013-2014 TPP.

### 3. Conclusion

We appreciate the opportunity to provide comments to the 2013-2014 Transmission Planning Process Stakeholder Meeting that was held on November 20-21, 2013. We strongly support the enhanced coordination between the CAISO, CPUC and CEC related to integrated land-use, generation and transmission planning, including the DRECP. If you have any questions, our contact information is included below.

Respectfully submitted,



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