



## **Comments of NRDC on the California Independent System Operator's 2012-2013 Conceptual State Transmission Plan**

**Submitted by Carl A. Zichella, Director of Western Transmission**

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NRDC is a national, non-profit organization of scientists, lawyers, and environmental specialists, dedicated to protecting public health and the environment. Founded in 1970, NRDC serves more than one million members, supporters and environmental activists with offices in New York, Washington, Los Angeles, San Francisco, Chicago and Beijing. NRDC has a long history of efforts to protect and conserve the nation's natural resources, including in particular the nation's air, water, lands and resources. NRDC also has a long history of advocacy promoting the increased use of energy efficiency and renewable energy sources to meet America's energy needs both at the national level and in various states, including California.

Our comments are as follows:

1. The conceptual statewide plan (The Plan) includes very positive provisions NRDC supports, including:
  - a. Prioritizing transmission to take better advantage of the Helms pumped storage facility for renewable energy integration.
  - b. Identifying statewide transmission needs irrespective of balancing area authority (BAA) though full consideration of and approvals for these assets are left to the respective BAAs.
  - c. Coordinating with other BAAs via the California Transmission Planning Group (CTPG) to study transmission cases related to complying with the state's Renewable Portfolio Standards (RPS). This is the only planning forum at the moment in which investor-owned and public utilities collaborate on planning and includes independent transmission sponsors as well. The CTPG is currently on hold and its study outputs are dated (all predate the Record of Decision for the Solar Programmatic Environmental Impact Statement for example) and will need revision.
  - d. Identifying the need for transfer capacity enhancements between the Imperial Irrigation District (IID) and CAISO systems to facilitate renewable energy projects.
  
2. The Plan could be improved by including an analysis of:
  - a. How proposed state transmission solutions help to address and implement the recommendations from North American Electricity Reliability Council

and Federal Energy Regulatory Commission in the aftermath of the September, 2011 southwest blackout, including

- i. Better coordination between BAAs
  - ii. Better information sharing between BAAs
  - iii. Better situational awareness across multiple BAAs.
- b. The Plan should look beyond RETI zone analysis done via the CTPG to include analysis of transmission needed to serve solar energy zones established by the recent Federal Solar Programmatic Environmental Impact Statement. In many cases the same solutions will be needed, but RETI zones have been updated or replaced by the SPEIS zones and will be further superseded by zones identified in the Desert Renewable Energy Conservation Plan. Projects located in these zones will have very high viability, having undergone extensive vetting with stakeholders and federal and state agencies, and transmission upgrades needed to serve them will result in substantial benefits to the state in terms of rapidly constructed renewable energy projects, reliability, delivered energy and land conservation.
- c. The Plan should identify ranges of magnitude for potential contributions from demand side resources that are currently completely discounted in the plan and at least consider pilot projects to find solutions for visibility and dispatchability issues. With respect to energy efficiency, the Plan should identify the best estimate of contributions from all future efficiency programs, codes, and standards, (the “uncommitted” energy efficiency).
- d. NRDC continues to support consideration of transmission for high potential areas for renewable generation particularly on contaminated and/or less ecologically sensitive lands such as the Central Valley and portions of the West Mojave. Promising resource areas will be overlooked if viability determinations are limited to the discounted core of projects assigned by CPUC portfolios. While the discounted core is a valuable tool, renewable energy development in low-conflict areas in the state will be deferred unnecessarily, even though transmission to those areas enhances geographic diversity of renewable resources, lowers integration and congestion costs and otherwise aids in overall system reliability.

Thank you for considering these comments.

Respectfully submitted,

A handwritten signature in blue ink that reads "Carl Zichella". The signature is fluid and cursive, with the first name "Carl" and last name "Zichella" clearly legible.

Carl Zichella  
Director of Western Transmission