March 3, 2015

RE: Comments on the draft 2014-15 Transmission Plan
FR: Westlands Solar Park

The Westlands Solar Park appreciates the ability to make comments to the CAISO draft 2014-15 Transmission Plan.

Background

The WSP is the fifty-fifth competitive renewable energy zone (CREZ) created from the Renewable Energy Transmission Initiative - more commonly known as RETI. The size of the WSP is approximately 27,000 acres and it is the only CREZ designated by RETI in the San Joaquin valley. The concept of master planning both transmission and solar generation in the WSP was inspired by the RETI discussions and reinforced by the needs of farmers in the Westlands Water District to retire thousands of acres of drainage impaired farmland from irrigated agriculture due to unreliable surface water allocation, a multi year drought and a lack of a drainage system to move contaminated water out of these areas.

The best alternative use for these drainage impaired farmlands is conversion to solar generation and the Westlands Water District in partnership with the farmers and the development team of Westside Holdings have embarked on a strategy to master plan the generation and transmission opportunity in this area.

The California Energy Commission has endorsed this concept of opening up renewable generation opportunities in the central valley on marginal farmland in the 2013 Integrated Energy Planning Report. Also numerous environmental and agricultural organizations have supported directing energy and transmission planning efforts to the Westlands Solar Park due to it being "smart from the start"[1].

Constantly changing renewable portfolio assumptions hinders renewable energy planning and development and inadequate transmission in central and San Joaquin valley creates a chicken and egg problem for renewable energy projects

One of the main hurdles for successfully bringing out renewable generation from the central valley is the lack of transmission access. One of the inputs to directing transmission planning is the renewable resource portfolio letter from the CPUC and the CEC. In the 2014-15 renewable resource portfolio the resource assumptions for the Westlands CREZ is no higher than 505 MW under the 33 percent 2024 Low Mid AAEE and as low as 389 MW under the High DG/33 percent/Mid AAEE + DSM. These assumptions do not match with what is happening at the ground level and is drastically different from previous assumptions for the Westlands CREZ[2]. As of January 2012 there have been forty-five solar PV projects and another fifty-nine proposed for the southern San Joaquin Valley[3]. This combined amount of solar energy would be over 4,000 MW's that is far in excess of the renewable assumption for this area in the 2014-15 renewable resource portfolios. We ask that the CAISO work with the CPUC and the CEC to develop future portfolios that do not

[1] Kate Kelly and Kim Delfino. "Smart From the Start: Responsible Renewable Energy Development in the Southern San Joaquin Valley". July 2011.
[2] http://www.caiso.com/Documents/2012-2013-FinalRenewableGenerationPortfoliosRecommended_CPUC-CEC.pdf
[3] Kate Kelly and Kim Delfino. "Smart From the Start: Responsible Renewable Energy Development in the Southern San Joaquin Valley". July 2011. Page 6.

fluctuate so dramatically from year to year unless there is a clear demonstration that the resource potential in an area has changed positively or negatively.

Recommended solutions to building renewable generation in the San Joaquin valley

The CAISO, CPUC and the CEC should begin studying the transmission needs of meeting renewable generation beyond 33 percent. Given that transmission development has a long lead time it is necessary to begin studying for these eventual scenarios of higher renewables now versus on a "wait and see" approach when the alternatives to transmission will be more costly to ratepayers. Beginning the transmission planning process now is important for the renewable development in the San Joaquin since developers are now beginning to make long term commitments on whether to invest here or in other states. The WSP supports increasing transmission planning efforts for this area in the 2014-15 TPP since increasing capacity will accelerate the renewable development opportunity in the area and support the regions burgeoning clean energy jobs.

Transmission projects that WSP supports to bring renewable generation out of San Joaquin valley

Lastly the WSP supports Westerns planned 230 kV San Luis Transmission Project and encourages CAISO to study proposals in this planning cycle to augment the 230 kV project to a 500 kV project that would significantly improve the reliability and renewable benefits to the CAISO system and renewable energy development in the San Joaquin valley.