

**Comments of the Natural Resources Defense Council (NRDC) on the
2015-2016 Transmission Planning Process**

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I. Introduction and Summary

The Natural Resources Defense Council (NRDC) appreciates the opportunity to offer these comments on the *2015-2016 Transmission Planning Process Stakeholder Meeting*, presented at the November 16, 2016 workshop. NRDC is a non-profit membership organization with more than 80,000 California members who have an interest in receiving affordable energy services while reducing the environmental impact of California's energy consumption.

II. Discussion

NRDC greatly appreciates California ISO staff's study and presentation of transmission needs in the 2015-2016 Transmission Planning Process Stakeholder Meeting. NRDC thanks California ISO for the opportunity to participate in the November 16, 2015 workshop covering the policy-driven and economic assessments. We respectfully offer these comments:

A. NRDC applauds California ISO for relying on future energy efficiency to reduce transmission needs.

NRDC strongly supports and commends California ISO for its decision to rely on energy efficiency savings from future utility efficiency programs, appliance standards, and building code improvements in its forecast of electricity needs. The assessments provided continue the recent history of California ISO working together with the California Public Utilities Commission and California Energy Commission to rely on energy efficiency in resource planning processes. As noted in the workshop, 11 reliability projects are being cancelled, in part due to a lower forecast of demand, which is driven in significant part by new energy efficiency. These included numerous reconductoring and reinforcement projects, two lines, a transformer replacement, and a bus upgrade. We strongly support California ISO's decision to rely on energy efficiency as a transmission resource.

B. NRDC supports the proposal to *study* two scenarios that use different demand forecasts in this transmission planning process, one with and one without future efficiency savings, in order to better identify the work that efficiency is accomplishing.

California ISO proposed to study two scenarios using alternate forecasts in this transmission planning process: one with and one without Additional Achievable Energy Efficiency. We support this approach to studying transmission needs, as it will better indicate the avoided transmission resources due to energy efficiency savings. We, of course, strongly urge California ISO to continue *relying* on the scenario that includes the future energy efficiency. Failure to do actually rely on the results that include future energy efficiency results in duplicative resource investments.

III. Conclusion

Thank you for the opportunity to comment on the *2015-2016 Transmission Planning Process Stakeholder Meeting*. NRDC applauds California ISO for its commitment to rely on energy efficiency as a resource in determining transmission needs. We look forward to working with the California ISO staff and stakeholders on future developments in the process.