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California Energy Commission
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Docket No. 15-RETI-02

RE: Comments of the Independent Energy Producers Association (IEP) on the Renewable Energy Transmission Initiative (RETI) 2.0 Organizational Structure and Work Plan

The Independent Energy Producers Association (IEP) appreciates the opportunity to comment on the Renewable Energy Transmission Initiative (RETI) 2.0 Organizational Structure and Work Plan (workshop convened November 2, 2015). IEP offers the following thoughts as the California Energy Commission (CEC), California Public Utilities Commission (CPUC) and the California Independent System Operator (CAISO) begin to delineate the goals for the RETI 2.0 process. In contemplating program design, IEP would like the respective agencies to consider transparency, streamlining where possible, identifying where decision points will occur, how the existing competitive market fits in, and the timeframe in which RETI 2.0 will be completed.

Transparency is the Key to Success. In order for stakeholders to have confidence in the RETI 2.0 process and results, RETI 2.0 needs to be open and transparent such that all stakeholders can participate and provide input. The work products should be publicly available and easily accessible. Upfront, the RETI 2.0 process should acknowledge where and when decision points will occur; and during the RETI 2.0 process, it should be transparent as to how those decision points were decided and derived.

Streamlining RETI 2.0 Will Allow All Stakeholders to Participate to the Maximum Extent Feasible. While IEP appreciates the need for the formation of individual groups within the RETI 2.0 process (e.g. The Environmental and Land Use Technical Group; Transmission Technical Input Group; and the RETI 2.0 Plenary Group), the greater the number of groups, the more

difficult it is for participation from all interested parties at all times. IEP recognizes the importance of forming specialized groups that include experts from each subject area; however, if the plenary group is the place where it all comes together, it makes sense to have an explanation/summary of the other group's work at the kickoff of each plenary group meeting. For example, a general overview of the planning efforts/conclusions of the other groups at the beginning of each plenary meeting may make the RETI 2.0 process as a whole more transparent and easily accessible, especially for those stakeholders that only have the resources and/or expertise to participate in the plenary group. Alternatively [or in addition] there may be some value from circulating notes (e.g. via listserv) from each of the individual group meetings to inform stakeholders of the discussions had and conclusions made. This also speaks to the transparency issue raised above.

Stakeholders Need an Indication of Where Decision Points Will Occur. During the RETI 2.0 stakeholder workshop, staff leads indicated that the RETI 2.0 objectives were to inform future planning and regulatory proceedings and that the RETI 2.0 will be informed by the portfolios and vice versa. However, the practical application of this informative back and forth is not abundantly clear. How much weight will the RETI 2.0 process/conclusions be given in other regulatory proceedings? Will planning assumptions be consistent across the RETI 2.0 process and the CPUC's LTPP, for example? How and when will the RETI 2.0 inputs and conclusions feed into some of these other stakeholder processes?

One suggestion posed during the workshop was to create a master document that would delineate all the planning efforts underway, with a schedule and a timeline for each planning effort. IEP supports this idea as it would be immensely helpful not only for this initiative, but for planning use in general. Using this master schedule, the RETI 2.0 effort could pinpoint where decisions will be made and in what timeframe in relation to other planning efforts.

The RETI 2.0 Process Should Not Stymie Development Opportunities that Would Otherwise Result from Competitive Procurement. A potential concern that IEP has with the RETI 2.0 process is whether RETI 2.0 will usurp opportunities that might otherwise occur as a result of competitive procurement. For example, stalling needed procurement or procurement approvals while the RETI 2.0 process is underway is problematic. The RETI 2.0 conclusions

should be considered after the point in which results are published and conclusions are definitive. The fact that RETI 2.0 is underway should not stymie development in the meantime. Further, to the extent that the RETI work product specifies certain resources or resource locations, these conclusions should not thwart development that might otherwise be good options in terms of costs, low environmental impacts, etc.

Identify The Timeframe In Which Decisions Will Be Made and Results Will Be Available.

Finally, the RETI 2.0 process needs to have a binding schedule for outcomes. A clear timeframe (e.g. 18 months from start to completion) is necessary to ensure that California does not stymie development waiting for the completion of RETI 2.0. There needs to be a binding schedule for outcomes, and this schedule must be kept. Otherwise, California runs the risk of spending both agency and stakeholder time and money on an initiative that is outdated and whose inputs and assumptions have already become stale by the time the results are put into action. To the extent the RETI 2.0 process gets bogged down in additional data and modeling, that is not particularly helpful or timely.

IEP appreciates the opportunity to make these preliminary comments on the RETI 2.0 organizational structure and work plan and we look forward to working with you during the RETI 2.0 process.

Respectfully Submitted,



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