Bay Area Municipal Transmission Group's Comments on the Workshop on Strategic Transmission Planning (17-IEPR-13)

June 6, 2017

The Bay Area Municipal Transmission Group[1] (BAMx) appreciates the opportunity to comment on the Workshop on Strategic Transmission Planning a held on May 24, 2017.

Increased Emphasis on Integrating non-Wires Solutions into Planning Processes

Through the action plan developed to address the reliability concerns in Southern California associated with the retirement of the Once-Through-Cooling (OTC) generation and the sudden retirement of the San Onofre Nuclear Generating Station (SONGS), California had only begun to receive the benefits of targeted development of Preferred Resources in managing reliability. In that effort, Preferred Resource targets were set as part of an integrated planning solution followed by utility procurement.

Unfortunately, such a process is more the exception than the rule. More typical is transmission planning process accepting the pattern of supply- and demand-side procurement as planning input rather than output. In such a structure, the opportunity to avoid expansion of the transmission system is more happenstance than a planning objective.

Senate Bill (SB) 350, known as the Clean Energy and Pollution Reduction Act of 2015, introduced integrated resource planning (IRP) as the statewide approach to electric resource planning in California. The IRP process, used to identify the best mix of supply- and demand-side resources to reduce GHG emissions and ensure reliability while meeting the state's other policy goals, must not overlook opportunities to control transmission cost and environmental impacts. Supply- and demand-side integrated planning should also be integrated with the transmission planning process. For example, the workshop presentation by the California Energy Storage Alliance (CESA) touched upon some of the benefits of targeted deployment of energy storage in reducing electric transmission needs.

As part of the transition to an IRP process, BAMx recommends that the 2017 IEPR Strategic Transmission Planning include elements discussing how the state agencies can cooperate in developing an integrated plan where the cost of delivery as well as procurement options are more fully considered in the planning process.

Continued Need for CEC to Investigate Low-Cost Transmission Alternatives

There were several workshop presentations concerning low cost methods for maximizing the use existing rights of way. One of the presentations addressed a technology developed and marketed by Smart Wires. Others addressed advanced conductors. BAMx encourages the Commission to further investigate low cost/environmentally preferred technologies to increase the ability of the

[1] BAMx consists of City of Palo Alto Utilities, and the City of Santa Clara's Silicon Valley Power.

transmission grid to serve its functions. Particular attention should be paid to whether there are regulatory obstacles or other disincentives to the incorporation of these technologies or whether there are technical issues that need to be addressed. If there are such technical issues, the CEC should consider whether those can be overcome via the Commissions research programs.

Thank you for the opportunity to comment and we look forward to continued public stakeholder participation.

If you have any questions concerning these comments, please contact Kathleen Hughes (khughes@SantaClaraCA.gov or (408) 615-6656)