

July 10, 2009

Clare Laufenberg Gallardo  
California Energy Commission  
1516 Ninth Street, MS-46  
Sacramento, CA 95814-5512

Re: Imperial Irrigation District Comments on RETI Phase 2A Draft Report

Dear Ms. Gallardo:

The Imperial Irrigation District (IID) appreciates the opportunity to submit the following comments to the RETI Phase 2A Draft Report dated June 3, 2009. IID commends the efforts of the California Energy Commission (CEC), California Public Utilities Commission (CPUC) and the other participants in the RETI process for working in a collaborative fashion to develop a comprehensive plan for expansion and reinforcement of the state's electrical transmission grid in order to meet the state's renewable energy goals. IID has been an active participant in RETI's Stakeholder Steering Committee and the Conceptual Planning Work Group.

IID has been a strong proponent of the development of renewable energy as a means of meeting California's energy needs and preserving the environment. IID continues to work closely with its neighbors in California to enhance the regional transmission system in order to facilitate the export of renewable energy from the Imperial Valley to the load centers of California and the Southwest. IID recognizes that improved transmission access is one of the keys to the development of renewable energy in the Imperial Valley, which will boost economic development and bring much-needed, well-paying jobs to a region of California that desperately needs them.

With that in mind, IID respectfully submits the following comments:

### **Section 3.5 Line Segment Groups – Imperial Group**

A description of IID's proposed transmission expansion plan is set forth in Appendix G of the RETI Phase 2A Report. IID's transmission plans rely almost exclusively on the upgrade of existing IID transmission facilities. As a result, these upgrades can be accomplished more quickly, with fewer environmental impacts and at a lower cost than a new transmission project.

IID transmission is a cost-effective way for renewable energy generation to interconnect to the grid and wheel energy to California load centers. IID has made substantial

investments in transmission in the Imperial Valley and, as set forth in Appendix G of the Phase 2A Report, has plans to spend millions more in expansion and upgrades to its system to increase export capabilities. IID cautions against any plans to build new transmission in the Imperial Valley that would strand IID transmission investments. Currently, IID has approximately 1000 MW of excess capacity on its collector system available to wheel renewable energy.

IID submits that its transmission expansion plans can provide the core of the collector system needed in the Imperial Valley to export renewables. IID has substantial transmission assets in the key renewable resource areas in the Imperial Valley – in particular around the geothermal resource area of the Salton Sea. IID’s transmission system can be quickly and easily upgraded at a low cost in order to accommodate the anticipated renewable energy development. In addition, utilization of existing transmission facilities and rights-of-way will have minimal environmental impacts.

### **Section 3.9 Recommendations for Study and Development of Line Groups**

Section 3.9 of the Phase 2A Draft Report states that recommendations for the study and phased development of each Group of transmission line segments presented in the draft report will be presented in the Phase 2A Final Report.

IID is a member of the recently-formed California Transmission Planning Group (CTPG). This is a group of California transmission owners and operators with planning responsibilities made up of publically-owned utilities, investor-owned utilities and the California ISO. The CTPG will be a forum for these members to conduct joint transmission planning studies and coordinate transmission planning activities to develop a statewide transmission plan that will meet the state’s renewable energy goals. The CTPG process will adhere to FERC Order 890 planning principles.

IID submits that the CTPG is well-suited to conduct the type of study and development of line groups that are referenced in Section 3.9 of the Phase 2A Draft Report.

Thank you for your consideration of these comments. Please feel free to contact me if you have any questions.

Very truly yours,

Stephen J. Keene

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