PROCESS

You're probably hearing this from others, but may as well hear it from us.

1. One week is really inadequate notice and opportunity for review of the draft. B&V started this in January. Why the short fuse for environmental input?
2. We question the composition of the "environmental" working group, on which environmental interests with a vote constitute only a small minority. Sounds like a recipe for disaster. What was the composition of the generators' working group, etc?
3. Generally, the RETI stakeholders' steering committee should include a representative of the DG Alliance of California (or equivalent), and this rep should serve on the environmental working group as well.
4. The B&V report asserts the "environmental" working group will create an expanded(?) exclusion list, but also states "This information is expected to be informative but not definitive -- any transmission or generation project that seeks to begin actual construction will still undergo, as part of existing permitting process, more targeted and thorough environmental impact review." Does "informative" equate to "exclusionary?"
5. Similarly, the report is vague about the environmental ranking of CREZs, something that is critical to limiting environmental damage while less invasive technologies have time to develop. In this ranking, how will avoidance of environmental resources be weighted, compared to economics, for instance?

ASSUMPTIONS

I can't reiterate how strongly I feel that it is essential we get our own expert advice on technical matters. I'm just a neophyte, but I glanced at a few pages of the draft report, and found the following very questionable assumptions.

1. The report's assumption regarding capacity value uses average generation during summer months, instead of year-round.* This method will bias capacity values towards solar thermal and away from wind, local PV, etc. Since summer peak demand will already be a big factor economically, this proposed additional weighting of capacity values towards summer is scary. This is especially troublesome since remote solar is the biggest threat to desert resources.
2. Also, PG&E and SCE value (through peak tariff rates) renewable DG PV at 3x to 4x remote renewables. This should factor into the B&V analysis, as it means that renewable DG has the potential to eliminate much of the transmission expense that is not quantified in the B&V analysis and free up existing transmission to accommodate large amounts of renewables.
3. I haven't read it yet, but I recall someone saying that B&V assume that only 1.5 gigawatts of rooftop PV will contribute to reaching the RPS goals. This is another anti-local-renewable assumption we should investigate.
4. The B&V bias, judging from this an their AZ and NM reports, is an endorsement of solar trough thermal power which will produce power at a much higher cost than the current generation of grid-connected PV is coming in at. And to boot, requiring cooling water (they assume hybrid cooling at best) in areas that are water limited now and that will be

even more limited 20-25 years from now. This is another technical bias that will gravely impact environmental resources, and we should employ independent expertise to rebut it.
5. The Publicly Owned Utility (POU) v Investor Owned Utility (IOU) issue needs to be addressed at some point. What assumptions does the report make about whether POUs will continue to insist on "vertical integration" or whether they will share transmission with IOUs? Will RETI address this critical issue?

ENVIRONMENTAL RESOURCES

I understand that Ilene is refining the constraints map, so please ask her for the latest iteration. Also, the cultural areas survey commissioned by Mojave Desert Land Trust is in draft form and should be available soon. It should be very helpful, although based on limited survey data.

1. I like the list of resources (to be avoided) that you compiled, Johanna, but would revise the cultural item (which, as I recall spoke mainly to sacred sites) to read "Areas of known and suspected high cultural sensitivity." [and you will soon have a map with polygons of these areas plus reports on the areas themselves] 2. I forget if your list addressed protecting water resources, and using least land feasible. If not, please add.
3. As a general approach, the carbon emissions of construction and operation should be reflected for the various technologies. At the January meeting, RETI said that trucking of biomass was considered carbon neutral. It is not, and construction of remote plants is not, either. We should object, with expert help, and submit data.

* Compare the draft report's capacity value assumption with that fact that, in December, it was assumed that "The CPUC's Resource Adequacy accounting conventions, or the CEC's ELCC numbers could be the basis for valuing capacity. A working group was established to focus on valuation and integration issues." [Dec SSC notes]

Sincerley,

Joan Taylor,
Sierra Club