



WESTLANDS

SOLAR PARK

California Energy Commission

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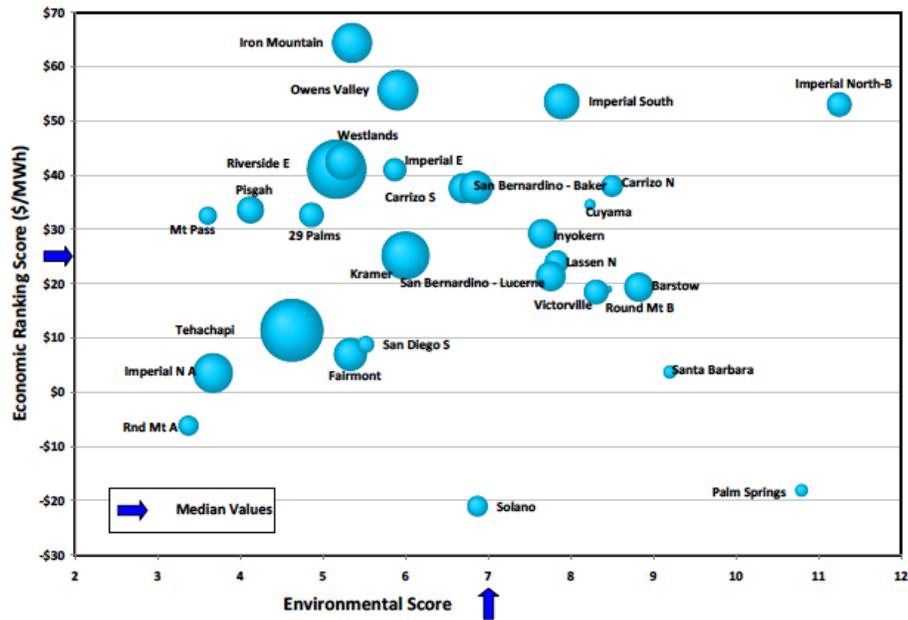
RE: Comments to the August 5th Lead Commissioner Workshop on Integrating Environmental Information in Renewable Energy Planning Processes

The Westlands Solar Park submits these comments to the August 5th Lead Commissioner Workshop on Integrating Environmental Information in Renewable Energy Planning Processes.

Why Solar Development in the WSP is a Win-Win for California

The development of solar generation in the WSP is a win-win for California due to the nexus of federal and state environmental priorities to retire these drainage-impaired land in the Westlands Water District that have elevated concentrations of salt and selenium. Also, the location of the WSP meets the state's goal to see large-scale solar generation sited near existing transmission corridors consistent with the Garamendi principals. Lastly, the siting of WSP near major load in central and northern California makes generation from this location ideal for utilities concerned about the costs and permitting challenges of new transmission to meet their RPS mandates.

The Renewable Energy Transmission Initiative (RETI) identified the WSP in the Phase 2B report (below) as a renewable energy zone with high environmental score.



- Notes:
- Areas of the bubbles are proportional to CREZ energy.
 - Lassen South CREZ is off the right side of the chart. (Economic Score = 18, Environmental Score = 19.50, Energy = 1051 GWh)
 - San Diego North Central CREZ is off the right side of the chart. (Economic Score = 15, Environmental Score = 22.3, Energy = 502 GWh)
 - Victorville and Round Mountain-B are coincident

Figure 1-5. CREZ Economic and Environmental Scores Phase 2B, Bubble Chart.

Transmission and Generation Cost Benefits of Solar from WSP

The WSP provides both short and long term renewable energy delivery opportunities at the least cost to ratepayers and with the least environmental impact.

The challenges to developing renewable generation in the central valley and the WSP are twofold, the first challenge being that the state has not prioritized a specific goal to go beyond the 33 percent RPS either through a higher mandate or greenhouse gas reduction target. The second challenge is there has been no long-term transmission plan approved to increase capacity in the central valley that supports renewable generation development.

From a planning perspective the energy regulatory agencies need to show commitment to a long term plan to build out low conflict renewable energy zones like WSP by encouraging utilities to propose transmission projects that are “right sized” to meet current and future needs. Also, the risk of stranding assets can be avoided when transmission is approved for projects that are multi purpose, previously prioritized in planning efforts like RETI, located in low conflict zones, and conform to Garamendi principles of being located near or in existing corridors.

The WSP competitive renewable energy zone fits all the above conditions by being approved in the RETI and ranked high in environmental scoring due to being located on drainage impaired farmland, RETI identified transmission upgrades to this area for “foundation” purposes (to meet the RPS) and being multi purpose

(increasing access to Helms pump hydro), and the WSP being located underneath existing transmission corridors being Path 15.

Challenges to Landscape Planning Low Conflict Areas for Renewable Generation

The current process for developing renewable portfolios for the transmission planning process needs to stop prioritizing power purchase agreements and transmission interconnection applications as the main drivers to determine the feasibility of renewable zones. If the policy goal of the state is to look at promoting and developing low conflict renewable energy zones then the portfolio development process should view sound planning practices, low environmental mitigation costs, supporting multi purpose transmission, and adherence to Garamendi principles as the starting points for judging the feasibility of renewable energy zones.

The pre screening requirements that are layered on top of the portfolio development criteria and other criteria imposed by the utilities are barriers to the landscape planning for renewable generation in low conflict areas because the emphasize always comes back to commercial feasibility which ultimately means PPA's and interconnection agreements. The chicken and egg problem (i.e. generation can't be built without transmission and transmission can't be planned without generation) of commercial development makes it challenging for developers to locate in a specific area like the WSP, without direction from regulators, because there is a concern about limited transmission capacity being a factor that will impact their ability to get PPAs signed. Similarly utilities are hesitant to sign PPAs with firms that don't have interconnection agreements that have progressed to the phase 2 at the CAISO. Both of these are very understandable hurdles for developers to overcome but direction from regulators to utilities could and should speed the process up for planning and building out these low conflict renewable energy zones. The goal of planning should be to focus on encouraging and supporting ready made renewable energy zones for development and when these zones are in low conflict areas that have multi purpose benefits the planning efforts should be accelerated.

Environmental and Energy Benefits for Land Retirement in WSP

The 30,000 acres of farmland in the WSP is all drainage impaired with elevated levels of selenium and high saline soils that require intensive management in order to produce adequate crop yield for the farmers. Also, surface water deliveries to WSP farmers are subject to chronic and substantial shortfalls. This has necessitated increased groundwater pumping from the deep aquifer that exacerbates the already over drafted groundwater basin. Additionally, cumulative salt loading to the deep aquifer occurs as salts are flushed from the surface soils. In the long run, the continued groundwater mining and salt pollution of the deep aquifer will render it unusable as a source of supplemental irrigation water, with disastrous consequences for the agricultural economy of the San Joaquin Valley.

In recognition of the need to address the environmental impacts associated with continued farming on drainage impaired lands in Westland's, the federal government has recommended as one of the long term solutions to retire and convert these lands to solar energy production. Westlands' farmers want to see a solution to the diminishing allocation of water from the federal water project and

the lack of completion of a drain to carry the selenium and salt off their lands that impact their ability to productivity farm these lands in the long term. Conversion of carefully selected drainage-impaired lands in the WSP to solar energy production is an ideal solution to the water and energy needs of California as long as policymakers are able to work with the landowners in the WSP to create a procurement and transmission plan that will effectuate the long term development of solar in this area.