



September 22, 2015

CPUC/BLM  
c/o Aspen Environmental Group  
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**RE: Comments of NRDC on West of Devers Draft EIS**

## **Introduction**

I am writing on behalf of the Natural Resources Defense Council (NRDC) to recommend modifying the preferred recommendation on the Draft Environmental Impact Statement to preserve lower cost and less environmentally impactful development in the West of Devers corridor to meet present and expected future renewable energy development. The preferred alternative reduces the value of this upgrade by limiting ability to expand the lines in the future within a precious, already existing corridor that has the capacity to do so. These limitations will increase costs, slow the pace of renewable deployment, and potentially precipitate the need to find additional rights of way in a sorely congested part of the state.

NRDC is a national, non-profit organization of scientists, lawyers, and environmental specialists, dedicated to protecting public health and the environment. Founded in 1970, NRDC serves more than one million members, supporters and environmental activists with offices in New York, Washington, Los Angeles, San Francisco, Chicago and Beijing. NRDC has a long history of efforts to protect and conserve the nation's air, water, lands and wildlife resources. NRDC also has a long history of advocacy promoting the increased use of energy efficiency and renewable energy sources to meet America's energy needs both at the national level and in various states, including California.

## **Future needs and state policy goals not fully considered by the DEIS**

NRDC supports the plan to expand this transmission because it is a crucial to our ability to meet present and future renewable energy and greenhouse gas (GhG) reduction goals. The selected route makes efficient use of existing corridors and has the fewest environmental impacts. It is supported by the Morongo Tribe, whose partnership with Southern California Edison is a landmark in utility-tribal transmission coordination. The proposed project would facilitate development of large scale solar in the Blythe and Desert Center areas, and was identified as an important transmission upgrade in the Renewable Energy Transmission Initiative (RETI), on which NRDC served.

NATURAL RESOURCES DEFENSE COUNCIL

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Yet the Draft EIR's preferred alternative would reduce the proposed increase in transfer capacity a third. The full increase is needed to accommodate renewable generation currently under development and future development necessary to achieve both the existing 33% RPS mandate and the new 50% RPS mandate that was approved after the Draft EIR was published, as well as continued GhG emissions targets mandated by AB32 (80% reduction from 1990 levels by 2050). Meeting all these goals will require a carefully planned and robust transmission system serving all parts of our state. Areas with the fewest options for transmission expansion (such as the West of Devers area), would benefit the most from a master planned, long-range approach to transmission development. Failing to allow for these acknowledged and known state policy goals seriously undermines the value proposition of the proposed project and hampers critical state environmental programs.

NRDC has long been a proponent of master planning both procurement and transmission to meet present and future needs.<sup>1</sup> This approach is being considered by the California Energy Commission, CAISO and the CPUC as part of the RETI 2.0 process and the San Joaquin Valley renewable energy zone development process.

By mandating a second round of construction and outages close on the heels of the first round of construction and outages the phased alternative will increase consumer costs and is highly likely to unnecessarily delay renewable energy development needed to meet the state goals mentioned above. The draft EIR itself concedes that the environmental impacts from successive rounds of constructions is a disadvantage of the Phased Alternative. Phased development is often the preferred approach to meeting future needs when they are not clear but reasonably anticipated. In this case we believe the goals are explicit and clear, the needs evident and delaying the development of capacity we know we will need is unnecessary.

Sincerely,

A handwritten signature in blue ink that reads "Carl Zichella". The signature is fluid and cursive, with the first name "Carl" and last name "Zichella" clearly distinguishable.

Carl Zichella  
Director of Western Transmission

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<sup>1</sup> See COMMENTS OF THE NATURAL RESOURCES DEFENSE COUNCIL ON REALIGNING TRANSMISSION PLANNING TO MEET STATE CLIMATE MITIGATION AND RENEWABLE ENERGY GOALS, Order Instituting Rulemaking to Continue Implementation and Administration of the California Renewables Portfolio Standard Program, Rulemaking 11-05-005, November, 2014