

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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Order Instituting Rulemaking to Continue Electric
Integrated Resource Planning and Related
Procurement Processes.

R.20-05-003

**COMMENTS OF THE COALITION OF CALIFORNIA UTILITY EMPLOYEES ON
PROPOSED DECISION TRANSFERRING ELECTRIC RESOURCE PORTFOLIOS TO
CAISO FOR 2021-2022 TRANSMISSION PLANNING PROCESS**

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Pursuant to Rule 14.3 of the Commission’s Rules of Practice and Procedure, the Coalition of California Utility Employees (“CUE”) submits these comments on the Proposed Decision Transferring Electric Resource Portfolios to California Independent System Operator for 2021-2022 Transmission Planning Process (“PD”).

I. INTRODUCTION

CUE is a coalition of unions whose approximately 43,000 members work at nearly all of the California electric utilities, both publicly and privately owned. CUE strongly supported (and still does) SB 350’s mandate that California have “a diverse and balanced portfolio of resources” for “a reliable electricity supply that provides optimal integration of renewable energy in a cost-effective manner.”¹ The utility employees of CUE’s union members build the State’s electric transmission systems and CUE is concerned by the PD’s recommended base case portfolio for CAISO’s 2021-2022 Transmission Planning Process (“TPP”) for identifying transmission needs. The PD’s recommendation severely limits portfolio resources in southern Nevada in favor of resources in Arizona, which directly and negatively impacts jobs for Californians. The Commission should consider job creation and economic impacts when making its

¹ Pub. Utilities Code § 454.51(a).

recommendations and, given the choice, its resource planning efforts should create good jobs for Californians.

II. THE PD SHOULD BE REVISED TO SHIFT PORTFOLIO RESOURCES FROM ARIZONA TO SOUTHERN NEVADA

Relying on staff's analysis, the PD chooses siting thousands of megawatts of renewable generation in Arizona rather than in southern Nevada for CAISO's TPP.² The PD cites transmission limits in the GridLiance West transmission zone as the basis for its decision.³ But GridLiance has planned upgrades to the transmission infrastructure in southern Nevada which would create many thousands of jobs for Californians, boost California's economy, and allow California to access thousands of megawatts of diverse, cost-effective, renewable energy. Indeed, the Commission and the California Energy Commission found that the southern Nevada renewable energy zone could help California meet its GHG reduction goals.⁴ There is significant demand – 2,500 MW of generator requests – to develop renewable energy generation in the GridLiance service area.

GridLiance has planned a series of transmission system upgrades to access renewable energy in the California-Nevada desert. The International Brotherhood of Electrical Workers, including CUE members IBEW Local Unions 1245 and 47, and Nevada IBEW Local Unions 357, 401 and 396, have assessed the situation and it is clear to us that the southern Nevada upgrades, rather than the Arizona projects, are much more likely to create good jobs for Californians. GridLiance's proposed upgrades will create millions of hours of work for Californians who, by necessity, will travel to work on these transmission projects. Thus, the

² PD, p. 21.

³ *Id.*

⁴ "Energy Commission Staff's Proof-of-Concept to Allocate Renewable Resource Portfolios Selected by RESOLVE to Specific Locations on the Electric Transmission Grid," February 2018.

IBEW locals in both California (two who are a part of CUE and whose members do transmission work) and Nevada support siting portfolio resources in southern Nevada rather than in Arizona.

The Commission has a clear path to creating thousands of good jobs for Californians. Given the choice between siting portfolio resources in southern Nevada or Arizona, the Commission should air on the side of creating good jobs for Californians. This is particularly critical now, given the devastating job loss and economic effects of the COVID-19 pandemic. The Commission should reconsider its choice to site resources in Arizona rather than in southern Nevada.

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Respectfully submitted,

_____/s/
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